LOUISVILLE SUBSTATION EXPANSION

CITY OF LOUISVILLE

PLANNED UNIT DEVELOPMENT AMENDMENT & MINOR SUBDIVISION

OCTOBER 2025

Louisville Substation Expansion
City of Louisville – Application Submittal Requirements for a Planned Unit Development (PUD) Amendment and Minor Subdivision application.

Table 1. Application Submittal Requirements

Information	Location in this Permit Application	Louisville Zoning Code Citation
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Current and Proposed Use	Section 2	
Requirements Common to All Planning and Zoning Procedures	Section 3	17.04
PUD Amendment Review	Section 4	17.28.120
Request for Waiver to Community Development Design Standards and Guidelines - Section 6. Screen Walls and Fences	Section 5	17.28 Appendix A
Minor Subdivision Review	Section 6	16.04.020
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LIST OF ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practice
CDDSG	Commercial Development Design Standard and Guidelines
City	City of Louisville
Comp Plan	Louisville Comprehensive Plan
C.R.S.	Colorado Revised Statute
Code	The City of Louisville Code of Ordinances
Louisville	City of Louisville
PUD	Planned Unit Development
Project	Louisville Substation Expansion Project
SAP	Sustainability Action Plan
Xcel Energy	Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy

1 INTRODUCTION

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (“Xcel Energy”), proposes an expansion of the existing Louisville Substation in the City of Louisville (“Louisville” or the “City”). The Louisville Substation Expansion consists of expanding the existing substation yard to the southeast via a Minor Subdivision application to add approximately 0.59 acres to the existing substation yard (“Substation Expansion”) to facilitate additions to the substation facility via a Planned Unit Development (“PUD”) Amendment (Attachment 1) which will include the additions of fencing to the substation area, transmission interconnection, access driveway, and substation electrical equipment and infrastructure (“Project”). The proposed use is described in detail in Section 2.

This application for a PUD Amendment/Final PUD is located at 2280 S. 88th Street in Louisville, Colorado (subject property) as shown in Attachment 2: Minor Subdivision Plat. The existing substation parcel (“Existing Substation Parcel”) is excluded from the Redtail Ridge Filing No. 1 subdivision (Attachment 3: Redtail Ridge Filing No. 1) but the 0.59 acre proposed substation expansion area (“Expansion Area”) is included in the Redtail Ridge Filing No. 1 as part of Lot 1, Block 3. The Redtail Ridge Filing No. 1 subdivision plat is accompanied by the Redtail Ridge PUD #5 (Attachment 4: Redtail Ridge PUD) that is currently under review by Louisville which is the latest amendment to the original Conoco Preliminary PUD.

Xcel Energy requests that the City approve the Project in accordance with the Commercial Development Design Standard and Guidelines (“CDDSG”) as well as the provisions set out in Sections 17.28.120 and 17.28.180 of the Code of Ordinances of the City of Louisville, Colorado (“Code”).

Xcel Energy requests Louisville also approve a Minor Subdivision in accordance with Sec. 16.12.110 of the Code for the Project concurrently with the PUD Amendment/Final PUD. This application is made according to the Application Submission requirements set forth in Sec.17.28.160 of the Code. In compliance with Code Section 17.28.180, a Final PUD Plan must be submitted within one (1) year following the approval of the preliminary development unless a written request for an extension is made. The concurrent filing of the PUD Amendment/Final PUD satisfies this timing requirement required by the Code.

Finally, Xcel Energy requests that the City approve a waiver of the requirements of Section 6 of the CDDSG to allow for the installation of a perimeter security fence around the Expansion Area that would connect with the existing security fence surrounding the Existing Substation Parcel.

The proposed electric substation use at the Expansion Area is a permitted use under the Conoco GDP because Xcel Energy qualifies as a private utility. A PUD Amendment/Final PUD is required for the Project to accommodate the development of the Expansion Area as an electric substation and to establish the final development pattern and condition for the Expansion Area. In compliance with Code Section 17.28.180, a Final PUD Plan must be submitted within one (1) year following the approval of the preliminary development unless a written request for an extension is made. The concurrent filing of the PUD Amendment and Final PUD satisfies this timing requirement required by the Code.

A Minor Subdivision is required to add the approximately 0.59 acres of Expansion Area to the Existing Substation Parcel in order to provide room for the additions to the substation and create a single legal lot for the Expanded Substation Site.

A waiver is required from the CDDSG to construct the necessary perimeter security fence around the Expansion Area to protect and promote public safety and security for the electric substation facility.

An analysis of how the Project meets PUD Amendment/Final PUD approval criteria found in Code Section 17.28.120, the Final PUD criteria in Section 17.28.180,and Minor Subdivision review criteria found in Code Section 16.12.075 is included in Section 6 of this document.

The PUD Amendment/Final PUD and Minor Subdivision require approval at public hearings by the City's planning commission and city council per Section 16.12.110 of the Code after notice is given as set forth in Section 16.04.070 of the Code.

2 BACKGROUND

On July 20, 1982, City Council passed and adopted Resolution No. 24, Series 1982, which approved the final plat and the PSCO Louisville Neighborhood Electric Substation SRU ("PSCo SRU") for the construction and operation of an electric substation on the Existing Substation Parcel. On April 20, 2010, City Council passed and adopted Ordinance No. 1569, Series 2010, which approved (1) Planned Community Zone District – Commercial ("PCZD-C") with PUD-C overlay zoning for the "390.013-acre ConocoPhillips Campus" and (2) the Conoco Philips Campus General Development Plan ("Conoco GDP"). The legal description of the 390.013-acre ConocoPhillips Campus in Ordinance No. 1569, Series 2010 and the Conoco GDP expressly excludes the Existing Substation Parcel. On April 20, 2010, City Council passed and adopted Resolution 12, Series 2010, which conditionally approved the Conoco Philips Preliminary Planned Unit Development ("Conoco Preliminary PUD"). The legal description of the 390.013-acre ConocoPhillips Campus expressly excludes the Existing Substation Parcel.

On July 10, 2025, Xcel Energy reached out to the City to confirm the zoning for the Existing Substation Parcel, and City staff responded on July 11, 2025 stating that the Existing Substation Parcel is in the PCZD-C zone district with PUD-C overlay zoning. and the same as the zoning for the Expansion Area. Because the Expansion Area is also zoned PCZD-C with PUD-C overlay, the Minor Subdivision process is applicable to the Project because the Expanded Substation Site is being created from parcels that currently have the same zoning.

3 CURRENT AND PROPOSED USE

The current use of the subject property is an electrical substation and the Project proposes no changes to the existing use. The Project expands substation facilities already located on the subject property. There are no changes of use being proposed. This application is to expand the existing use to meet the demands of a growing population within the City and to accommodate planned commercial development associated with the Redtail Ridge PUD. Section 2 of this narrative describes the need, proposed use, and the associated improvements for the Project within the subject property. This section also includes information regarding the compatibility of the Project with adjacent and surrounding land uses. The PUD Amendment/Final PUD (Attachment 1) shows details of the Project within the final subject property boundaries as proposed by the Minor Subdivision.

3.1 PROJECT NEED

Louisville and the surrounding areas continue to experience residential and commercial growth, which has increased the demand for electricity. The Project will add distribution capacity to Xcel Energy's existing system to continue delivering electric power to existing and future customers in the surrounding areas. The Project also supports other existing Xcel Energy substations in the region that are reaching their operating capacity.

The substation expansion will function as a distribution substation that reduces high-voltage electricity from transmission lines to a lower voltage that can be delivered via distribution lines to homes and businesses. Distribution substations are essential components of the electrical grid, serving as connection points between high-voltage transmission lines and homes and businesses. The Project will serve customers in the surrounding local community, including customers in the planned commercial development proposed within the Redtail Ridge PUD. In addition to increased electrical demand in the area, the Louisville Sustainability Action Plan includes a goal to reduce energy-related municipal greenhouse gas emissions 60 percent below the 2016 baseline by 2030 and achieve carbon-neutrality by 2050. Substation upgrades such as those proposed by the Project are crucial in facilitating the clean energy transition. As renewable energy resources are developed throughout Colorado additional load is

added to the electrical grid to transmit electricity generated by renewable energy resources to consumers. Substation technology and capacity will need to be expanded to provide electricity generated by renewable energy resources to residences and businesses. The Project is critical in providing electricity to the surrounding area and demand for Project completion is high, as the surrounding Redtail Ridge PUD is under review and construction on the commercial uses proposed by the Redtail Ridge PUD is anticipated to start within the next six (6) months. Construction of the Project is anticipated to begin in Summer 2026 and to be completed in Spring 2027, pending permits.

3.2 PROJECT DESCRIPTION

3.2.a Louisville Substation Specifics

The use and purpose of the existing Louisville Substation will remain unchanged with the expansion. This substation expansion will continue to allow for the subject property to function as a distribution substation that reduces high-voltage electricity from transmission lines to a lower voltage. The expansion will include the following components within the Louisville Substation:

- Expanded switchyard: 115 to 13.8 kilovolts and associated foundation;
- Metal-clad switch gear with exterior lighting;
- Substation equipment including but not limited to: transformers, conductors, circuit switcher, capacitor banks, and switches;
- An access driveway;
- Construction of a new security fence around the expansion area to prevent public access; and
- Distribution lines within the property.

The Louisville Substation Expansion does not change the point of interconnection at the Louisville Substation with Xcel Energy's existing electrical transmission system that connects to the subject property.

Planning Area 5 of the Redtail Ridge PUD includes the Expanded Substation Site. The Redtail Ridge PUD provides access to the Louisville Substation via Rockress Drive, a planned roadway that provides access to Planning Area 5 from Northwest Parkway to the east of the subject property. Rockress Drive is planned to be a public road and access to the Louisville Substation will come from two private access drives that connect with Rockress Drive as shown in the PUD Amendment/Final PUD (Attachment 1). The Louisville Substation will be expanded along its southeast boundary and will be expanded by 0.59 acres. No new parcels will be created, and the Existing Substation

Parcel will be enlarged as a result of the Minor Subdivision. The Redtail Ridge PUD shows the proposed expanded property boundaries for the Expanded Substation Site.

Distribution substations include electrical equipment located inside a secure and enclosed area. Equipment to be installed within the area enclosed by the security fence includes transformers, circuit breakers, disconnect switches, bus work, surge arresters, insulators, steel support structures, foundations, and a metal-clad switchgear. The Substation also contains maintenance areas for access to the equipment.

Xcel Energy will provide lighting needed to perform maintenance or emergency repairs by a permanent mounted light within the security fence (Attachment 1). Xcel Energy will control the lights using a motion detector switch and will only use the lights during occasional maintenance or emergencies. The lights will be downcast and will illuminate only the substation equipment so they will not create a nuisance off the subject property.

The Conoco GDP does not require any parking for private utility uses. The Existing Substation Parcel features areas for Xcel Employees visiting the subject property to park vehicles. There are no permanent employees stationed at the substation, as the substation is monitored remotely 24 hours a day, 7 days a week, 365 days a year. Employees visiting the substation for maintenance and other work-related purposes are not permanent employees of the substation and no additional designated permanent parking is necessary for the subject property.

The Project will utilize two new private access driveways from Rockcress Drive to provide access to the subject property from the public right-of-way. The access drives are shown on both the PUD Amendment/Final PUD (Attachment 1) and Minor Subdivision (Attachment 2 Minor Subdivision). The access drives have been designed to support the movement of large trucks and equipment to the Louisville Substation.

The two new access drives will be constructed to provide access to the Louisville Substation from Rockcress Drive. The new access drives will allow for large trucks and equipment delivery to access Louisville Substation as shown on the PUD Amendment/Final PUD (Attachment 1). Construction of the new access drives will require grading and the addition of road base and asphalt. The access drives are contemplated within the Redtail Ridge PUD as well and have been coordinated with the Redtail Ridge development to ensure proper spacing of access roads are maintained from Rockcress Drive.

The Substation Expansion equipment will be enclosed within a new segment of security fence that will be 10 feet tall. The existing fence surrounding the existing substation will be expanded to encompass the Substation Expansion area to the southeast of the existing facility. The fence generally is located along the proposed property boundaries

delineating the subject property from the surrounding Redtail Ridge PUD Planning Area 5 boundaries. The proposed security fence detail is included in the PUD Amendment/Final PUD (Attachment 1). Xcel Energy sets the height for security fences, so they are generally difficult to climb, which is a successful deterrent to entering substation sites. The security fence will be built of standard chain-link material. Xcel Energy security fences are 10 feet tall and feature chain-link material. The fence, due to the height and material proposed, will require a waiver from the CDDSG fence standards to be reviewed by planning commission and authorized by city council. As noted on sheet 1 of the PUD Amendment/Final PUD (Attachment 1) a request for a waiver from the Commercial Development Design Standards and Guidelines Section 6.1B, 6.1D, and 6.1E is provided with this PUD Amendment/Final PUD to allow for Xcel Energy to install additional security fencing around the expansion area that matches the existing security fence on-site. See Section 5 of this narrative for further discussion on the waiver request.

Xcel Energy substations do not feature landscaping within the substation (within the fence) as landscaping is a potential hazard within a substation. Keeping substations clear of landscaping and potential conflicts with electrical equipment and lines is paramount in keeping substations functioning and safe. Outside of the perimeter fence, on land owned by Redtail Ridge PUD, there is proposed landscaping. That landscaping is shown on the PUD Amendment/Final PUD (Attachment 1) and within Redtail Ridge PUD Planning Area 5 (Attachment 4 Redtail Ridge PUD). Coordination with the Redtail Ridge PUD has occurred to ensure that where distribution, transmission lines, and substation expansion fencing is located, landscaping will not be located to avoid conflict with those facilities. The landscaping provided by the Redtail Ridge PUD will be used as the required landscape screening of the substation.

The Redtail Ridge PUD included a drainage report that included the subject property in its analysis and accounted for the substation expansion. Per correspondence with Louisville staff on June 30, 2025 (Attachment 5) no drainage analysis or report is required for the Project.

3.2.b Distribution Lines

Xcel Energy requests approval of the portions of the underground distribution feeders located within the subject property boundary as part of the PUD Amendment/Final PUD and Minor Subdivision application. Approval of the distribution feeders located outside of the subject property will be permitted separately based on their location.

Underground distribution lines will exit from the Louisville Substation at the southeast corner of the subject property from the new metal clad switch gear equipment via a 5-foot-long stub and are placed in an easement outside of Xcel Energy-owned property.

New underground distribution lines will be connected to the existing distribution system that serves the surrounding areas. Switch cabinets will be installed in locations where the underground feeders connect with existing distribution.

3.2.c Construction

Construction of the Substation Expansion will occur in phases, generally including the following: civil grading and site preparation; installation of best management practices (BMPs) as needed; equipment mobilization and material delivery; foundation installation; physical, electrical, and control construction; and restoration as needed.

Once the pre-construction preparation work has been completed, work on the Louisville Substation will begin. The new substation foundation will consist of concrete reinforced with steel; the depth will be based upon the subsurface conditions. Once construction crews have excavated for the new substation foundation, the foundation will be poured and installed, and the hole will be backfilled.

Following grading and foundation installation, steel equipment support structures will be erected on the subject property. Electrical equipment (transformers, circuit breakers, disconnect switches and bus work, surge arresters, insulators, steel support structures, and metal clad switch gear) will be installed after the foundations and support structures are in place. Construction of the security fence will include delivery and direct placement of chain-link material. Equipment testing and placing in service will occur after construction is complete.

Once construction has been completed, the subject property will be restored to its existing condition which consists of gravel laid down on the surface within the fenced area. All areas not needed for ongoing operations and maintenance will be restored as soon as practicable and in coordination with Louisville requirements following construction.

3.2.d Construction Staffing, Vehicles, and Equipment

The first workers, vehicles, and equipment to mobilize for the Project will conduct investigative fieldwork and prepare work areas for construction. Prior to construction, soil borings and potholing will be completed to evaluate the subsurface conditions where facilities will be built. Geotechnical borings will be advanced using drill rigs.

Xcel Energy anticipates that construction workers will typically work one 10-hour shift per day (Monday through Friday) during substation and interconnection construction, potentially increasing to 12-hour shifts if required to meet the schedule. The maximum number of construction workers on-site at any one time will be approximately 20 for the construction of the Project. Xcel Energy expects construction of the substation to last up

to 14 months. Upon completion, the Project will be operated and monitored remotely 24 hours a day, 7 days a week, 365 days a year to provide safe and reliable electric service. On average, Xcel Energy employees will visit the Louisville Substation one to two times per month for inspections and maintenance. Xcel Energy employees will inspect the interconnection regularly to look for the following:

- Non-compatible vegetation and hazards within the subject property;
- Equipment needing repair or replacement;
- Property encroachments that can be hazardous to safety and reliable operations; and
- Anything that might jeopardize safe, reliable operation of the Louisville Substation.

The impact to local public roads will vary as construction proceeds depending on when materials and equipment are delivered to the Louisville Substation. The construction of the Project will involve mostly personal vehicle trips for construction workers at 15 to 20 vehicles per day.

Areas within the Louisville Substation will be designated for truck traffic to deliver materials for the construction of the Project; these trips will total approximately one to five per day. Concrete will be delivered via concrete trucks, and the concrete will be pumped or poured on-site. Daily concrete truck deliveries will be made when the foundations and piers are constructed. Multiple deliveries of yard rock (up to 20 per day) and concrete (up to 12 per day) will be required daily at certain stages of construction. To mitigate potential effects to local roads, Traffic Control Plans will be prepared and followed during construction, including ingress and egress to the subject property.

3.2.e Temporary and Permanent Effects

Substations and other electrical infrastructure are common throughout Colorado and the Denver Metro Area and are compatible with a wide variety of land uses, including residential, commercial, industrial, and agricultural uses. The existing Louisville Substation is an Xcel Energy-owned property with substation units that has been in operation since August 1982 when the Public Service Company of Colorado (“PSCo”) Louisville Neighborhood electric Substation Special Use Review (“SRU”) was approved.

Xcel Energy anticipates local temporary effects from construction to the surrounding area, including an increase in construction traffic; noise and dust from construction activities; increase in odors from construction equipment exhaust (fumes); increase in vibrations from heavy construction equipment; and visual effects from the presence of construction equipment. It is anticipated that most of these effects will not result in long-

term nuisances. If a nuisance arises during construction, Xcel Energy will coordinate with Louisville staff to mitigate the nuisance.

Local temporary effects of substation construction are expected to be confined within the Louisville Substation, and the only local long-term effect to the surrounding neighborhood Xcel Energy anticipates includes visual impact due to the presence of the Louisville Substation Potential external effects, environmental effects, and proposed minimization measures are discussed in detail below by topic: Construction, Health and Safety, Land Use (including Recreation and Residential), Noise and Electric and Magnetic Fields, Stormwater and Erosion, and Visual.

Construction and Nuisance Effects

Temporary impacts to local traffic will occur during construction of the Project from trucks delivering materials and equipment. Effects will be limited to the construction phase, and mitigation measures, such as traffic control, will be implemented to reduce the effects.

Xcel Energy does not anticipate traffic flow impacts during operation of the Louisville Substation because the Louisville Substation is unstaffed and will not generate trips beyond those occasionally needed for maintenance or emergencies.

Temporary effects from fugitive dust will occur during construction of the Project from surface disturbances. Dust control measures, such as application of water, will be implemented to reduce effects. No effects from dust are expected during operations because the soil exposed during construction will be stabilized by use of gravel within the fenced area.

Odors in the Project area may include the odor of exhaust from vehicles within the adjacent areas, as well as industrial and commercial operation odors from the adjacent industrial land uses. Odors resulting from construction of the Project may include vehicle and equipment exhaust. Xcel Energy expects that these odor emissions will be temporary and transient in nature, limited to the area of active construction, and adequately dispersed by diurnal winds. No odors are expected during operation of the Project.

Health and Safety

Xcel Energy’s substations and transmission lines, including the Project, are built and maintained to meet or exceed safety standards, such as those specified by the National Electrical Safety Code and the North American Electric Reliability Corporation. Every effort is made to ensure safety in construction, operation, and maintenance of Xcel Energy electric facilities. Substations and transmission lines are designed to withstand

extreme weather conditions, and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The transmission poles will be equipped with shield wires above the energized line; this equipment adds to the structure height but provides protection against lightning strikes.

Xcel Energy's electric facilities are monitored 24 hours a day, 7 days a week, 365 days a year, for any line contact, the term used to describe an object coming into contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and to keep the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually for line connections and damage. For the safety of the public, unauthorized personnel are not permitted to enter the substation or come in contact with the transmission line conductor wire.

Fires at substations are very rare. Xcel Energy's substations and transmission lines are monitored and controlled remotely from an operations center, where event response is coordinated. In the rare event of an emergency, Xcel Energy will likely be aware of an issue before the public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999. Unauthorized personnel, including emergency responders, should not approach the facilities and should not touch the electric lines or anyone/anything in contact with them. In the event of an outage or transformer failure, the affected substation equipment is immediately de-energized by the breaker equipment, and Xcel Energy personnel are dispatched to the subject property. Xcel Energy personnel receive safety training for emergency situations relating to high-voltage electrical equipment. Xcel Energy has coordinated with the Louisville Fire Protection District and consulted with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders based on national standards through the Responding to Utility Emergencies Program.

Xcel Energy will provide enclosed containment for trash disposal and will remove and properly dispose of all construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials. No hazardous materials will be used, stored, or generated within the Louisville Substation. The Project will not require transportation of hazardous materials.

Construction, operation, and maintenance activities will comply with applicable federal, state and local laws and regulations regarding the use of hazardous substances. Construction activities will be performed using methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into water sources. Activities will follow BMPs for the management of waste to avoid and minimize effects from potential spills or other releases to the environment.

Noise and Electric and Magnetic Fields

The construction phase will produce noise because heavy equipment will be required to install the foundation and equipment for the Project. Sound levels will fluctuate depending on the construction activity, equipment type and distance between noise source and receiver. Sound levels coming from construction equipment will vary depending on the construction phase and the number and type of equipment in use at any given time. Xcel Energy and its construction contractor will endeavor to address and alleviate any nuisances that are identified during construction.

Construction of the Project is expected to take place during daytime hours, between 7 a.m. and 7 p.m. Monday through Friday, and 8 a.m. to 5 p.m. on weekends. During operations, noise from the Louisville Substation will remain at or below State decibel sound limitations as required by Colorado Revised Statutes (C.R.S. §§ 25-12-101 et seq.). Existing background noise and distance to residences will function to attenuate noise levels (Xcel Energy 2025).

Electric and magnetic fields exist wherever electricity is produced or used, including around any electric appliance or wire that conducts electricity. Electric fields are created by voltage: the higher the voltage, the stronger the field. Anytime an electric appliance is plugged in, even if it is not on, an electric field is created in its vicinity. Electric fields are easily blocked by walls, trees, clothes, and skin. The further the distance from the source of the electric field, the weaker it becomes. Electric and magnetic fields extend outward from the conductor wire and decrease rapidly with distance from the conductor. There is no federal standard for transmission line electric and magnetic fields. The Project will be designed, constructed, operated, and maintained to meet or exceed applicable standards of design and performance set forth in the National Electric Safety Code.

Drainage and Stormwater

The Redtail Ridge PUD included a drainage report that included the subject property in its analysis and accounted for the Project. Per correspondence with Louisville staff on June 30, 2025, and as shown in Attachment 5, no drainage analysis or report is required for the Project.

Construction activities will be performed using methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into water sources. All activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment. Construction will not create runoff in excess of previous levels at the Louisville Substation or adversely affect drainage.

Xcel Energy will comply with permit application requirements, Louisville standards, and construction protocol to ensure that the Project does not affect water quality. Prior to construction, Xcel Energy will obtain a Storm Water Permit for Construction Activities from the Colorado Department of Public Health and Environment and develop a site-specific Stormwater Management Plan.

Visual Effects

The existing visual setting in the area around the Project consists of undeveloped PUD-Commercial zoned land within the Redtail Ridge PUD. The subject property is relatively flat, and the expansion area is also flat. The surrounding Redtail Ridge PUD generally slopes downwards from north to south and is bordered to the east by Northwest Parkway, the south by US Highway 36 and to the north and west by vacant land.

No vegetation is present within the Louisville Substation and generally, the surrounding Redtail Ridge PUD contains little vegetation. There is a small area of mature vegetation to the east of the subject property within the Redtail Ridge PUD. Existing utility uses are present, including the existing substation and high voltage transmission lines.

Short-term visual effects will occur during construction of the Project, resulting from construction activities and the presence of construction equipment and crews. Long-term visual effects will include the permanent presence of the Louisville Substation which includes the security fence and equipment and visible substation equipment. Viewers located farther away are likely to experience less visual impact because the existing and proposed screening (topography, vegetation, buildings) and distance from the facilities will decrease potential views. The Project will not significantly alter scenic vistas, unique landscapes or land formations as the substation exists currently.

The substation equipment will be enclosed within a 10-foot-tall chain-link security fence. The security fence detail is included in the PUD Amendment/Final PUD (Attachment 1). Xcel Energy substation security fences and walls are generally tall enough to make climbing difficult and to successfully deter entering the substation. The security fence is constructed onto a concrete footer and erected on-site. The fence will not comply with the Louisville standard architectural and material requirements, and because of this will require a waiver approved by city council.

Xcel Energy will provide lighting needed to perform maintenance and/or emergency repairs with permanent mounted lights within the security fence. Xcel Energy will control the light using a motion detector switch and will only use the light during occasional maintenance or emergencies. With the 10-foot tall perimeter fence, it is unlikely that wildlife activity will trigger motion activation. The lights will be pointed downward to protect dark skies; the lights will only illuminate the equipment and will not create a nuisance off the subject property.

During operation, if nuisances or issues arise for residences and business in the area, community members may use Xcel Energy's customer care service for both service issues and emergencies: 1-800-895-4999. Additional customer support contact methods are outlined on Xcel Energy's website at: https://www.xcelenergy.com/Customer_Support.

4 REQUIREMENTS COMMON TO ALL ZONING PROCEDURES

4.1 PRE-APPLICATION MEETING/CONCEPT PLAN REVIEW

Xcel Energy held a pre-application meeting with the City's Planning, Parks, Building, Economic Vitality and Public Works departments on May 8, 2025. In that meeting, the City determined that a PUD Amendment/Final PUD application and a Minor Subdivision Application would be necessary for the Project and could be submitted concurrently. Commercial design standards were discussed, as the standards apply to the Project's perimeter fence.

4.2 SUBMISSION OF APPLICATIONS

4.2.a Authority to File Applications

Xcel Energy has the authority to file the PUD Amendment/Final PUD application because it is the record owner of the Substation property summarized below. The PUD Amendment/Final PUD will be accompanied by a Minor Subdivision, which is required for adding the expansion area to the existing Xcel Energy fee-owned substation area. A letter of authorization between Xcel Energy and the Redtail Ridge PUD ownership group has been completed to facilitate the expansion of the substation.

Table 2. Ownership and Parcel information

Ownership	Information
Owner	PUBLIC SERVICE CO (PSCo) PO BOX 840 DENVER, CO 80201-0840
Parcel/Schedule Number	575-29-000-012
Physical Address	2280 S 88TH ST, LOUISVILLE, CO
Legal Description Existing PSCo Parcel	1.72 ACS M/L NE 1/4 29-1S-69
Legal Description of Final Parcel	TBD, confirm with recorded Plat

4.2.b Concurrent Requirements

Federal, state, and local permits and approvals may be required prior to construction. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction, as required. These may include, but are not limited to, major land use permits, access agreements, road use agreements, oversize/overweight permits, grading permits and stormwater permits.

Xcel Energy anticipates avoiding impacts to jurisdictional waters of the U.S. within Louisville, and therefore, does not anticipate that Project facilities will require a Nationwide Permit 57 or other U.S. Army Corps of Engineers permitting under the federal Clean Water Act Section 404.

The regulatory requirements identified by Xcel Energy are described in Table 3. This table is intended as an illustrative list of the permits and approvals that may be required for the Project, but other permits or approvals may also be required.

Table 3. Land Use Permit Requirements and Applicability to the Project

Jurisdiction	Title	Trigger	Statutory Reference	Status
State				
Colorado Public Utilities Commission	Notification of Intention to Submit Permit Application for Major Electrical Facilities	Filing permit application for location, construction, or improvement of major electrical or natural gas facilities.	Colorado Revised Statutes (C.R.S.) § 29-20-108	Xcel Energy filed a letter of intent statutory letter on 07/30/2025 and met with Louisville on May 8, 2025.
Colorado Public Utilities Commission	Government and State Notice Requirements, Mineral Owners	Public hearing by a local government on an application for development.	C.R.S. § 24-65.5-103	In accordance with C.R.S. § 24-65.5-103, the applicant will provide notice to the mineral owners associated with the Substation prior to Public Hearing with the Planning Commission. Mineral owners may choose to waive their right to receive the notice not less than 30 days before the hearing and may also waive their right to a separate hearing regarding notification.

Jurisdiction	Title	Trigger	Statutory Reference	Status
Colorado Department of Public Health and Environment	Construction General Stormwater Permit and Stormwater Management Plan	Construction sites that disturb 1 acre or greater.	5 Code of Colorado Regulations 1002-61	To be obtained prior to construction.
Local				
Louisville	Planned Unit Development Amendment	Land Use Application.	Louisville Zoning Code Sec. 17.28	This application.
Louisville	Minor Subdivision	Expansion of existing parcel.	Louisville Zoning Code Sec. 16.12.110	This application.

4.3 PUBLIC NOTICE REQUIREMENTS

Pursuant to Sections 16.04.070 and 17.04.070 of the Code, Summary Table of Public Notice Requirements, a PUD Amendment/Final PUD and Minor Subdivision require the following public notices.

- PUD Amendment/Final PUD – the Code (Sec. 17.04.070) requires Xcel Energy notify all affected properties within 750 feet by mail at least 15 days prior to the date of public hearing. Posted signs shall be provided by the City to Xcel Energy at least 15 days prior to hearing, and Xcel Energy shall post these notices along all adjoining rights-of-way. The City shall post notice of the date of the public hearing on the City's website at least 15 days prior to the date of public hearing. The City shall ensure notice is published in a newspaper of general circulation within the City at least 15 days prior to the date of the public hearing.
- Minor Subdivision – The Code (Sec.16.04.070) requires Xcel Energy notify all affected properties within 750 feet by mail at least 15 days prior to the date of public hearing. Posted signs shall be provided by the City to Xcel Energy at least 15 days prior to hearing, and Xcel Energy shall post these notices along all adjoining rights-of-way. The City shall post notice of the date of the public hearing on the City's website at least 15 days prior to the date of public hearing. The City shall ensure notice is published in a newspaper of general circulation within the City at least 15 days prior to the date of the public hearing.

5 PLANNED UNIT DEVELOPMENT AMENDMENT REVIEW

The formal PUD Amendment/Final PUD is included with this application as Attachment 1. Included with the PUD Amendment/Final PUD application are the following documents:

- Narrative (this document)
- PUD sheets (Attachment 1)
- Subdivision Plat (Attachment 2)
- Redtail Ridge Filing No. 1 (Attachment 3)
- Redtail Ridge PUD (Attachment 4)
- Louisville Drainage Report Correspondence (Attachment 5)
- Land Use application form (Attachment 6)
- Statement of Authority (Attachment 7)
- Current (dated within 90 days of application date) title policy or title insurance commitment with a Schedule B showing encumbrances on the property (Attachment 8)

5.1 PLANNED UNIT DEVELOPMENT AMENDMENT REVIEW CRITERIA (17.28.120) AND FINAL DEVELOPMENT PLAN REVIEW CRITERIA (17.28.180) ANALYSIS

For a PUD Amendment/Final PUD, Section 17.28.120 includes the following criteria that must be met.

A. The city council must be satisfied that the final development plan has met with each of the following criteria or can demonstrate that one or more of them is not applicable and that a practicable solution consistent with public interest has been achieved for each of these elements:

1. *An appropriate relationship to the surrounding area;*

   The Project is appropriately located as it is primarily surrounded by commercially zoned properties that remain largely undeveloped at the time of this application. The subject property has been used as a substation since 1982, and the Project proposes no changes to the historic use of the subject property merely an expansion of the current use onto the Expansion Area immediately adjacent to the Existing Substation Parcel. The existing Louisville Substation and the Project

will continue to provide electricity to the surrounding residences and commercial uses and will support the development planned for the Redtail Ridge PUD.

2. *Circulation in terms of the internal street circulation system, designed for the type of traffic generated, safety, separation from living areas, convenience, access, and noise and exhaust control. Proper circulation in parking areas in terms of safety, convenience, separation and screening;*

   The Project will use two new access roads off of Rockcress Drive as shown in the PUD Amendment/Final PUD (Attachment 1). The Project will only generate traffic during construction and the substation does not have regular staff so traffic demands following construction will be near zero. Substations are not staffed full time and are monitored remotely monitored 24 hours a day, 7 days a week. Because of this, long-term traffic impacts from the subject property are minimal as the Louisville Substation will only be accessed periodically by Xcel Energy employees. Parking is not required for private utility uses under the Conoco GDP.

3. *Consideration and provision for low and moderate-income housing;*

   The Project does not include residential development and is not a use that requires provision of low and moderate-income housing.

4. *Functional open space in terms of optimum preservation of natural features, including trees and drainage areas, recreation, views, density relief and convenience of function;*

   The Louisville Substation and expansion area contains no natural features to preserve as it has no trees, drainage areas or recreation areas. The Louisville Substation is not accessible to the public and the provision of open space within the substation is not practical. The Louisville Substation, including the expansion area, is fenced in and is not accessible to the public. The Louisville Substation has no permanent employees and no requirement for open space. The subject property and expansion area does not connect with recreation and when built, will create a minimal change in visual impact from the existing use of the Louisville Substation.

5. *Variety in terms of housing types, densities, facilities and open space;*

   The Project does not include any residential development and thus does not require a variety of housing types, density, facilities and open space.

6. *Privacy in terms of the needs of individuals, families and neighbors;*

The Project location has no adjacency and is not situated near any residential development. The surrounding land, while undeveloped, is zoned for commercial use as detailed by the Redtail Ridge PUD. The Louisville Substation is not accessible to the public and is surrounded by a security fence, making the substation private in its very nature and non-intrusive to the needs of individuals, families, and neighbors.

7. *Pedestrian and bicycle traffic in terms of safety, separation, convenience, access points of destination and attractiveness;*

   The Project does not feature any pedestrian routes or bicycle paths. The subject property is not in a location that is congruent with open space provisions, trails, or bicycle traffic as contemplated by the surrounding Redtail Ridge PUD. Substations do not permit access by the public for safety and security reasons and the provision of any pedestrian or bicycle traffic would pose a severe safety risk and thus is not provided with the Project.

8. *Building types in terms of appropriateness to density, site relationship and bulk;*

   The Project proposes no buildings of any bulk and does not affect density as it creates no residential or commercial development. The Louisville Substation's relationship with other buildings and streetscapes is minimal, as it is not accessible by the public for safety and security reasons and is not a land use that allows for planned, dense development.

9. *Building design in terms of orientation, spacing, materials, color, texture, storage, signs and lighting;*

   There are no buildings being proposed that have visual impact. All lighting on the substation will be downcast and only motion activated. There is no storage within the Louisville Substation. Signage will be minimal and primarily present for safety and identification purposes only. The existing transmission poles are matte grey and will not change the existing character of the area as transmission poles already serve the substation.

10. *Landscaping of total site in terms of purpose, such as screening, ornamental types used, and materials used, if any; and maintenance, suitability and effect on the neighborhood;*

    Landscaping will be located outside of the perimeter fence and outside of the subject property and is provided by the Redtail Ridge PUD within Planning Area 5. Landscape materials within a substation are not recommended and not provided because landscaping cannot come in contact with electrical equipment for safety reasons. The Redtail Ridge PUD provides landscaping in areas outside

of the security fence for the substation in a manner that provides screening of the fence and the Louisville Substation property from surrounding areas. Maintenance of landscaping will be performed by the Redtail Ridge PUD as the landscaping is located on Redtail Ridge PUD owned land.

11. *Compliance with all applicable development design standards and guidelines and all applicable regulations pertaining to matters of state interest, as specified in chapter 17.32;*

    The Project does not affect matters of state interest specified in Code Chapter 17.32.

12. *None of the standards for annexation specified in chapter 16.32 have been violated;*

    This standard does not apply, as annexation is not proposed by either the minor subdivision or the PUD amendment/Final PUD application.

13. *Services including utilities, fire and police protection, and other such services are available or can be made available to adequately serve the development specified in the final development plan.*

    The Project does not have a substantial impact on police and the Project will be reviewed by the Louisville Fire Department. Revisions will be made to the Project application based on comments from other referral agencies. Fires are extremely rare at substations given the design and safety measures put in place at substations, which will be the case for the Project.

B. The following list of criteria and guidelines will be reviewed by the city in determining whether a project shall be approved as a planned unit development. The criteria and guidelines listed below must be addressed by the applicant in plans and/or reports submitted to the city. An applicant merely addressing the guidelines and criteria shall not automatically merit approval of the planned unit development plan submitted. Satisfaction of the described criteria and guidelines shall be determined by the city council and the city council may also require additional criteria and guidelines be met with respect to a particular plan.

1. *Development shall be in accordance with the adopted elements of the comprehensive development plan of the city, and in accordance with any adopted development design standards and guidelines.*

   The Project has been designed in accordance with the comprehensive development plan of the city as described in Section 4.2.a of this document.

2. *No structures in a planned unit development shall encroach upon the floodplain. Existing bodies of water and existing stream courses shall not be channelized or altered in a planned unit development plan.*

   No floodplain, bodies of water, or existing streams are located within the subject property and none of the proposed substation equipment will impact the floodplain. Grading for the Project, as detailed in the PUD Amendment/Final PUD documents, is minimal in nature and does not channel or alter stream courses or bodies of water. The City of Louisville, as stated in their correspondence dated June 30, 2025 and as seen in attachment 5, a drainage analysis and report is not required for the Project. City of Louisville public works staff determined the impacts of the Project to be negligible and generally covered under the Redtail Ridge PUD #5 drainage analysis and report.

3. *No occupied structure shall be located on ground showing severe subsidence potential without adequate design and study approved specifically by the city.*

   No occupied structures are proposed with the Project. A geotechnical investigation has occurred for the substation and all substation equipment, which is all unoccupied, has been designed in accordance with geotechnical report.

4. *The proposal should utilize and preserve existing vegetation, land forms, waterways, and historical or archeological sites in the best manner possible. Steep slopes and important natural drainage systems shall not be disrupted. How the proposal meets this provision, including an inventory of how existing vegetation is included in the proposal, shall be set forth on the landscape plan submitted to the city.*

   A landscape plan has been provided with the Redtail Ridge PUD Planning Area 5 for landscaping surrounding the Louisville Substation. No landscaping is proposed by the Project as it is a substation expansion and landscaping is not allowed within a substation for safety reasons. The subject property is flat and contains no vegetation, waterways, distinct landforms, or historical or archeological sites. The Project does not disrupt natural drainage systems, and the expansion of the subject property is to an area that features no vegetation, unique landforms, waterways, or historical or archeological sites.

5. *Visual relief and variety of visual sitings shall be located within a development in the overall site plan. Such relief shall be accomplished by building placements, shortened or interrupted street vistas, visual access to open space and other methods of design.*

The Project is an expansion of an existing substation and consists of adding new substation equipment to a small area to the southeast of the existing Louisville Substation. Visual impact is minimal from the Project, as the expansion of the substation will not result in a significant change of the visual character of the area. No occupied buildings will be added, and the only additions to the substation include substation equipment and security fencing. The surrounding Redtail Ridge PUD provides landscaping outside of the security fencing on the Redtail Ridge PUD property to provide visual screening of the security fencing.

6. *Open space within the project shall be located in such a manner as to facilitate pedestrian use and to create an area that is usable and accessible to residents of surrounding developments.*

   The Project does not provide open space and is not accessible to the public. Substations are not accessible to the public for safety and security reasons, and the Project does not allow access to the public and does not provide open space available to the public.

7. *Street design should minimize through traffic passing residential units. Suggested standards with respect to paving widths, housing setbacks and landscaping are set forth in public works standards of the city and applicable development design standards and guidelines. The system of streets, including parking lots, shall aid the order and aesthetic quality of the development.*

   The Project does not provide any public streets or public access to vehicles and pedestrians. Substations are not accessible to the public for safety and security reasons, and the Project is not accessible to the public. The Project is surrounded by a security fence and is only accessible by two private access drives to the subject property.

8. *There shall exist an internal pedestrian circulation system separate from the vehicular system such that allows access to adjacent parcels as well as to parks, open space or recreation facilities within the development. Pedestrian links to trail systems of the city shall be provided.*

   The Project does not provide any access to pedestrians, as substations are not accessible to the public for safety and security reasons. No access to parks, open space, or recreation facilities are located within the subject property and the subject property is not integral to providing pedestrian access to open space. The Project is surrounded by a security fence and is only accessible by a private access drive to the subject property.

9. *The project and development should attempt to incorporate features which reduce the demand for water usage.*

   The Project does not require water and will not use any water. This criteria is not applicable.

10. *Landscape plans shall attempt to reduce heating and cooling demands of buildings through the selection and placement of landscape materials, paving, vegetation, earth forms, walls, fences, or other materials.*

    The Project does not provide any landscaping, as landscaping is not allowed within a substation for safety reasons. This criteria is not applicable.

11. *Proposed developments shall be buffered from collector and arterial streets. Such buffering may be accomplished by earthen berms, landscaping, leafing patterns, and other materials. Entrance islands defining traffic patterns along with landscaping shall be incorporated into entrances to developments.*

    The Project does not border a collector or arterial street and is accessed by two private access drives. The surrounding Redtail Ridge PUD provides landscaping surrounding the subject property within the Redtail Ridge PUD property. The subject property does not contain any public streets and does not require screening from collector and arterial streets.

12. *There shall be encouraged the siting of lot arrangement, building orientation and roof orientation in developments so as to obtain the maximum use of solar energy for heating.*

    The Project consists of a single lot and does not contain any occupied buildings or any structures to be accessed by the public. This criteria does not apply to the Project.

13. *The overall PUD shall provide a variety of housing types.*

    The Project consists of a single lot that will be expanded to allow for an expansion of an existing substation. No housing is provided. This criteria does not apply to the Project.

14. *Neighborhoods within a PUD shall provide a range of housing size.*

    The Project consists of a single lot that will be expanded to allow for an expansion of an existing substation. No housing is provided. This criteria does not apply to the Project.

15. *Architectural design of buildings shall be compatible in design with the contours of the site, compatible with surrounding designs and neighborhoods, shall promote harmonious transitions and scale in character in areas of different planned uses, and shall contribute to a mix of styles within the city.*

    The Project contains no occupiable buildings and features only structures needed for the continued use of the substation. The Project is not accessible to the public and is surrounded by a security fence. The Redtail Ridge PUD that surrounds the subject property includes landscaping that is located on the Redtail Ridge PUD property. The landscaping provides screening of the security fence.

For a PUD Amendment/Final PUD, Section 17.28.180 includes the following requirements be provided.

A. *The final development plan, which may reflect an entire development stage as delineated on the preliminary development plan or any logical parts thereof, must be submitted within one year following the approval of the preliminary development plan, unless a written request is made for an extension of one year and such request is approved or unless a longer period of time is expressly set forth in a vested rights agreement executed pursuant to section 17.54.090. If the final development plan proposes development which exceeds the staging schedule, the need for deviation from the schedule shall be documented and a revised development staging schedule shall be submitted.*

   The Project consists of a Final PUD request which fulfills the requirements of the final development plan.

B. *The final development plan shall be prepared at a scale of not less than one inch equals 100 feet, and shall be submitted in sufficient detail to evaluate the building design and other features of the planned unit. The final development plan must contain, insofar as applicable, the following minimum information:*

   1. *The existing topographic character of the land at a contour interval of two feet if the slope is less than ten percent (spot elevations may be required if land is too flat for contours), and five feet where the slope is greater than ten percent;*
   2. *The proposed land uses and their respective acreage;*
   3. *The location and size of all proposed buildings, structures, utilities, easements, and other improvements;*
   4. *The maximum height of all buildings shall be stipulated. Specific consideration must be given to the maximum height of structures or significant views which may be obscured;*

5. *The density and type of dwellings, if applicable;*
6. *The location, number of lanes, median width, curb cuts, access control and proposed turning movement restrictions of arterial streets;*
7. *The location of collector and local streets;*
8. *The off-street parking areas, service areas including trash areas, loading areas and provision for bicycle trails and bicycle storage;*
9. *The location, height and size of proposed signs, lighting and advertising devices;*
10. *The areas to be dedicated to the city or reserved as common areas;*
11. *The 100-year floodplain and floodway, if applicable;*
12. *A general landscape plan at the time of submission to be followed by a detailed landscaping plan once the plan has been approved showing the spacing, sizes and specific types of landscaping material, including parking areas;*
13. *Proposed architectural elevations;*
14. *A development schedule setting forth timing for construction of the development.*

The Project includes a Final PUD which includes the final development plan requirements listed above.

C. *Copies of any special agreements, conveyances, restrictions, or covenants which will govern the use, maintenance and continued protection of the planned unit and any of its common park areas must accompany the final development plan.*

The Project includes a Final PUD which includes the final development plan requirements listed above along with a minor subdivision application.

D. *The applicant may submit any other information or exhibits he deems pertinent in evaluating his proposed planned unit development, and the planning commission may request additional information which it deems necessary for adequate review and evaluation.*

The Project includes a Final PUD which includes the final development plan requirements listed above along with a minor subdivision application

5.2 PLANNED UNIT DEVELOPMENT AMENDMENT CONSISTENT WITH RELEVANT MUNICIPAL PLANS

5.2.a Louisville Comprehensive Plan

The Louisville Comprehensive Plan (Comp Plan; City of Louisville 2025a) shows the subject property located within the Phillips 66 Special District and classifies the district as a Rural Special District. The Louisville Substation, and the Redtail Ridge PUD, are located entirely within the Phillips 66 Special District. The Comp Plan identifies the Phillips 66 Special District as:

> "…*a unique subarea of the City which contains vital community facilities that provide critical services to the City and also presents a unique regional development opportunity. Due to the isolated nature of this special district, it is somewhat self-contained. However, the district will remain connected to the region through US 36 and to the rest of Louisville 35 through pedestrian and bicycle trails*."

The Project is supportive of community facilities planned for the Redtail Ridge PUD and generally the Project will be supportive of development within the area as the Project will provide continued reliable electricity to the surrounding area. The Comprehensive Plan includes Principles to implement the plan and an analysis of each Principle as it relates to the Project.

Table 4. Comprehensive Plan Principles Analysis

Principle	Project Compliance
Neighborhoods and Housing (NH)	
PRINCIPLE NH-1. Planning commission shall develop and city council shall adopt a process for the creation, adoption, and implementation of Neighborhood Plans to define and preserve the unique special qualities of each neighborhood.	The Project is not subject to a Neighborhood Plan. The surrounding area is vacant, and the Project is surrounded by the Redtail Ridge PUD which is currently under review by Louisville. Therefore, this goal does not directly apply to the Project.
PRINCIPLE NH-2. The Neighborhood Plans shall include definitive steps to be taken by the City, including but not limited to changes in zoning or other regulatory codes and improvements in physical and social infrastructure.	The Project is not subject to a Neighborhood Plan. The surrounding area is vacant, and the Project is surrounded by the Redtail Ridge PUD, which is currently under review by Louisville. No change to zoning or other regulatory codes are proposed by the Project. The Project provides physical infrastructure improvements that benefit Louisville by providing reliable electricity to the surrounding area.
PRINCIPLE NH-3. Neighborhood Plans shall be compatible with this Comprehensive Plan and other adopted goals and policies for the City.	The Project is not subject to a Neighborhood Plan. The surrounding area is vacant, and the Project is surrounded by the Redtail Ridge PUD which is currently under review by Louisville. The Project is compatible with the Comprehensive Plan.
PRINCIPLE NH-4. The character and identity of existing residential neighborhoods should be maintained while allowing for evolution and reinvestment.	The Project will not change the character and identity of the existing neighborhoods as it is an expansion of a current use on a parcel that is surrounded by vacant land.
PRINCIPLE NH-5. There should be a mix of housing types and pricing to meet changing economic, social, and multi-generational needs of those who reside, and would like to reside, in Louisville.	The Project does not provide housing. Therefore, this goal does not directly apply to the Project.
PRINCIPLE NH-6. The City should define City-wide goals for affordable and low-income housing through a public process	The Project does not provide housing. Therefore, this goal does not directly apply to the Project.

Principle	Project Compliance
Transportation, Mobility, and Accessibility (TMA)	
PRINCIPLE TMA-1. The Louisville is committed to creating a context-sensitive, multimodal transportation and trail system which integrates land use, transportation, and recreational considerations and enables vehicles, transit, bicycles, and pedestrians of all ages and abilities to move in ways that contribute to the economic prosperity, public health and exceptional quality of life of Louisville	The Project is for the expansion of an existing substation that is not meant to be accessed by the public. Substations are not accessible to the public for safety and security reasons. The Project does not provide public access via any form of transportation in order to remain inaccessible to the public. Therefore, this goal does not directly apply to the Project.
PRINCIPLE TMA-2. The Louisville should develop and implement area-specific and City-wide transportation plans through an open and collaborative process to achieve the principles and policies outlined above.	The Project is for the expansion of an existing substation that is not meant to be accessed by the public. Substations are not accessible to the public for safety and security reasons. The Project does not provide public access via any form of transportation in order to remain inaccessible to the public. Therefore, this goal does not directly apply to the Project.
Cultural Heritage (CH)	
PRINCIPLE CH-1. The City should support and encourage the voluntary preservation of historic structures through its policies and actions.	The Project expands an existing substation use, which contains no historic structures or buildings. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CH-2. Preservation efforts should contribute to a sustainable community.	The Project expands an existing substation use, which contains no historic structures or buildings. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CH-3. City policies should encourage a livable community with a strong sense of history.	The Project expands an existing substation use, which contains no historic structures or buildings. The subject property is not a historic site. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CH-4. The City should provide effective public outreach regarding Cultural Heritage issues.	The Project expands an existing substation use, which contains no historic structures or buildings. The subject property is not a Cultural Heritage site. Therefore, this goal does not directly apply to the Project.

Principle	Project Compliance
PRINCIPLE CH-5. The City should ensure fiscally-sound best management practices for City historic resources.	The Project expands an existing substation use, which contains no historic structures or buildings. The subject property is not a historic site. Therefore, this goal does not directly apply to the Project.
Parks, Recreation, Open Space, and Trails (PROST)	
PRINCIPLE PROST-1. Improve trail connections to promote healthy and enjoyable alternative transportation and opportunities for active recreation	The Project is for the expansion of an existing substation that is not meant to be accessed by the public. Substations are not accessible to the public for safety and security reasons. The Project does not provide trail connections or access in order to remain inaccessible to the public. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-2. Maintain existing high levels of service for parks, open space, and trails as Louisville matures and evolves.	The Project is for the expansion of an existing substation that is not meant to be accessed by the public. Substations are not accessible to the public for safety and security reasons. The Project does not provide any parks, open space, or trails as the Project is not meant to be accessible by the public. Providing open space within a substation is also not allowed as the footprint of a substation is electrified and not safe for provision of open space. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-3. Ensure a Service Delivery Model that remains responsive and relevant to City residents' leisure behaviors, interests, and needs.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-4. Enhance programming capacity by exploring opportunities outside of Louisville facilities and services.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-5. Promote environmental stewardship and education.	The Project does not provide parks, open space, or trails. No educational elements are provided with the Project. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-6. Enhance communications and outreach efforts to increase efficiencies and effectiveness.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.

Principle	Project Compliance
PRINCIPLE PROST-7. Maximize intergovernmental agreements with Boulder Valley School District.	The Project does not provide parks, open space, or trails. No communication with the Boulder Valley School District is anticipated with the Project. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-8. Evaluate and review the effectiveness and understanding of partnership agreements.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-9. Define/Improve Park Maintenance Standards.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-10. Define/Improve Open Space Maintenance & Management Standards.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-11. Sustain the high level of service to which citizens have become accustomed.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-12. Renovate, expand, and develop Facilities.	The Project does not provide parks, open space, or trails. Therefore, this goal does not directly apply to the Project.
PRINCIPLE PROST-13. Implement 2011 Coal Creek Golf Course Strategic Plan.	The Project is not included with the Coal Creek Golf Course Strategic Plan. Therefore, this goal does not directly apply to the Project.
Municipal Infrastructure (MI)	
PRINCIPLE MI-1. The City should provide adequate public facilities, water, sewer and related services to meet the demand of existing and future residents and commercial and industrial growth.	The Project provides adequate electricity, a public utility, to the existing and future residents and commercial and industrial growth. The Redtail Ridge PUD, in review by Louisville currently, will utilize distribution from the Project for electricity demand associated with the planned development by the Redtail Ridge PUD. The Project does not utilize public water and sewer.
PRINCIPLE MI-2. The City should take measures to ensure development fees provide adequate improvements necessary to serve new development.	The Project does not require any development fees as it does not require water or sewer provisions. Access to the Project is from a private access road and there will be no permanent traffic impacts from the Project.
Principle MI-3. The City should continue to make improvements to reduce the impacts of potential flooding on property owners.	The Project is not located in any floodplain areas or any area prone to flooding. A drainage plan developed by Redtail Ridge PUD, the surrounding property owner, has been provided to Louisville for

Principle	Project Compliance
	review and it contemplates the development proposed by the Project within the drainage plan.
PRINCIPLE MI-4. The City should take steps to ensure an adequate long-term water supply for the City in the face of droughts and changes to the regional climate.	The Project does not require water services and will have no impact on Louisville water resources. Therefore, this goal does not directly apply to the Project.
Energy (E)	
PRINCIPLE E-1. The City should efficiently use energy resources and continually strive to conserve energy where practical.	The Project expands the existing substation use to allow for efficient distribution of electricity to surrounding properties. The Project allows for the substation to continue to distribute electricity generated by renewable energy sources to the surrounding area.
PRINCIPLE E-2. The City should increase its internal purchase of renewable energy and expand opportunities for renewable energy where practical.	Xcel Energy plans to reduce carbon emissions 80 percent by 2030, on the way to delivering 100 percent carbon-free electricity by 2050. Goals for renewable resources are identified in Xcel Energy's Electric Resource Plan, which was filed in March 2021. The Project provides electricity to surrounding residences and commercial developments, much of which is generated from renewable energy sources.
PRINCIPLE E-3. The City should promote increased energy efficiency in residential and commercial properties	The Project helps to make the substation more efficient in its distribution of electricity to the surrounding area. There is no residential or commercial development associated with the Project.
Community Services (CS)	
PRINCIPLE CS-1. Louisville should actively coordinate land use efforts with the Boulder Valley School District and promote excellence in education.	The Project is the expansion of an existing substation use and has no impact on Boulder Valley School District land use efforts. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CS-2. Excellence in education and access to educational opportunities should be a key feature of life in Louisville for residents of all ages.	The Project does not provide any education facilities and has no direct relationship or impact on education. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CS-3. The City should promote the health and safety of the community.	The Project is not meant to be accessible to the public for safety reasons. The Project includes a security fence and is not accessible by pedestrian or bicycle networks. Xcel Energy has numerous safety

Principle	Project Compliance
	protocols for substations in developed areas that are implemented at the substation to ensure it operates in a safe manner. Safety information is available upon request by Louisville.
PRINCIPLE CS-4. Promote and implement waste-reduction and recycling programs.	The Project will not generate waste or recycling products. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CS-5: The City should promote citywide community and civic events.	The Project is not accessible to the public and is not to be used for citywide community and civic events. Therefore, this goal does not directly apply to the Project.
PRINCIPLE CS-6: The City promotes the public and private advancement of the arts and culture to strengthen the quality of life and small town character of Louisville by encouraging the development of a City-wide Arts and Cultural Master Plan aimed at integrating the arts, culture and humanities with urban design, economic 49 development, education and other community development initiatives.	The Project does not provide public or private arts and culture events. The Project is not accessible to the public and does not contribute to the advancements of the arts and culture. Therefore, this goal does not directly apply to the Project.
Economic Development (ED) and Fiscal Health (FH)	
PRINCIPLE ED-1. The City should retain and expand existing businesses and create an environment where new businesses can grow.	The Project is an expansion of an existing substation use. The Project distributes electricity to the surrounding area including new businesses planned for the Redtail Ridge PUD. The Project supports the proposed commercial development by the Redtail Ridge PUD by providing increased distribution capacity to the area from the substation.
PRINCIPLE ED-2. The City should direct growth in an economically responsible way in order to maintain high quality amenities and high service levels for residents.	The Project is an expansion of an existing substation use. The Project distributes electricity to the surrounding area including new businesses planned for the Redtail Ridge PUD. The Project supports the proposed commercial development by the Redtail Ridge PUD by providing increased distribution capacity to the area from the substation.

Principle	Project Compliance
PRINCIPLE ED-3. The City should be responsive to market opportunities as they occur, and maintain and enhance the City's competitive position to attract development that adheres to the Community Vision.	The Project is supportive of the Redtail Ridge PUD proposed development as it provides distribution of electricity to the proposed development which includes commercial development.
PRINCIPLE ED-4. The City should cooperate with surrounding communities to explore opportunities for regional solutions to economic development challenges.	The Project is the expansion of an existing substation use on the subject property. Electricity travels to the substation via a transmission line where it is distributed to the surrounding area. Electricity is generated from renewable energy and traditional energy generation sources throughout the State of Colorado. The Project represents cooperation from surrounding communities to provide electricity to users throughout the state and, in the case of the Project, to development within Louisville.
PRINCIPLE ED-5. The City should work to support and maintain the historic and cultural attributes of the Downtown Business District.	The Project is not located in the Downtown Business District. Therefore, this goal does not directly apply to the Project.
PRINCIPLE FH-1. The City should maintain fiscal balance through effective land use decisions, focused economic development efforts, encouraging a mix of residential unit types and pricing, and strategic public investments, all consistent with the community's desire for high-quality services and amenities.	The Project is not a City investment. Therefore, this goal does not directly apply to the Project.

5.2.b Louisville Sustainability Action Plan

In November of 2016, the city council adopted Louisville's first Sustainability Action Plan (SAP; City of Louisville 2025b). The SAP was updated in 2020 and includes seven categories: climate, energy, transportation, waste, water, ecological health, and local food and agriculture. The SAP sets goals within each category. The Project speaks to two categories of the SAP, energy and climate. An analysis of how the Project complies with the energy and climate category is provided here.

Energy: The Energy strategy targets decarbonization through supporting energy efficiency upgrades to existing buildings and supporting adoption of building codes to support efficient building design. To that extent, Louisville provides resources to residences to connect with Xcel Energy programs such as energy assessments for business and homes and through rebate programs to encourage efficient design and use of buildings within Louisville. In addition to Xcel Energy's participation in these programs, this Project supports the Energy goal of the SAP by efficiently providing electricity to the surrounding area, including those developments proposed with the Redtail Ridge PUD. The substation receives electricity from a transmission line that runs to the substation currently. The transmission line is supplied with electricity generated by both renewable and traditional energy sources. Xcel Energy is a major Colorado producer and transporter of renewable energy generated electricity. To make this transported electricity consumable by an end-user it must make its way through a substation. The current substation has reached its capacity and needs to grow with the growing demand, allowing the sustainable energy that Xcel Energy transports and produces to be used by Louisville and its commercial and residential development. Xcel Energy plans to reduce carbon emissions 80 percent by 2030, on the way to delivering 100-percent carbon-free electricity by 2050. Goals for renewable resources are identified in Xcel Energy's Electric Resource Plan, which was filed in March 2021. The substation expansion proposed by the Project allows for electricity generated by renewable resources to be distributed to the surrounding area as more renewable resources are added to the transmission infrastructure feeding the Louisville Substation.

Climate: The Climate goal of the SAP focuses on reducing greenhouse gas emission. Louisville aims to reduce greenhouse gas through the following sub goals (City of Louisville 2025c):

- Meet all of Louisville's municipal electric needs with 100-percent carbon-free sources by 2025.
- Reduce energy-related municipal greenhouse gas emissions 60 percent below the 2016 baseline by 2030 and achieve carbon-neutrality by 2050.

- Generate 75 percent of Louisville's residential and commercial/industrial electric needs from carbon-free sources by 2030.
- Reduce energy-related residential and commercial/industrial greenhouse gas emissions 60 percent below the 2016 baseline by 2030 and achieve carbon-neutrality by 2050.

The Project is broadly supportive of all of the sub-goals included in the Climate goal. Xcel Energy plans to reduce carbon emissions 80 percent by 2030, on the way to delivering 100-percent carbon-free electricity by 2050. Goals for renewable resources are identified in Xcel Energy's Electric Resource Plan, which was filed in March 2021. Xcel Energy's goal to reduce carbon emissions while supplying electricity to Louisville through developments like the Project will help to reduce the greenhouse gas emissions attributable to Louisville.

6 REQUEST FOR WAIVER TO COMMUNITY DEVELOPMENT DESIGN STANDARDS AND GUIDELINES – SECTION 6. SCREEN WALLS AND FENCES

A request, to be reviewed by the planning commission and approved by the city council, for a waiver from the requirements of Section 6 of the CDDSG is provided here to allow for the installation of a perimeter security around the Expansion Area that would connect with the existing security fence surrounding the Existing Substation Parcel. Section 6 of the CDDSG includes the following Standards that the waiver request is for:

Section 6.1 Wall and Fence Design and Materials

B. Incorporate architectural treatment on both sides of perimeter walls.

D. Chain-link fencing with or without wood slatting is not an acceptable screen material.

E. Break up long expanses of fences or walls, with periodic columns, insets or change in materials.

The waiver request under Code Section 17.28.110 is for relief from the requirements of Section 6.1.B, 6.1.D, and 6.1.E. The proposed security fence is 10 feet tall, made of chain-link material, and covered with a stockade fence finish. The proposed security fence is standard to Xcel Energy substations and matches the existing fence utilized at the Louisville Substation. The proposed fence has proved to be the most secure and durable fence available for Xcel Energy substations. The fence material is essential to prevent unwanted entry and break-ins to the substation for significant safety and security reasons and to protect the substation equipment. The fence is difficult to climb

and prevents access from unauthorized visitors through the use of stockade finish which is slick and provides no handholds for a person to use to climb. The design of the fence does not utilize architectural treatments, as architectural treatments provide an easier location to climb or damage the fence. Similarly, no periodic columns are provided within the proposed fence in order to reduce locations where an unwanted visitor could climb the fence.. For these reasons, a waiver is requested from the Standards included in Section 6.1 of the CDDSG to allow for the proposed fence to be installed around the perimeter of the Louisville Substation, which waiver request is consistent with the spirit and intent of how the Project satisfies the development plan criteria under Code Section 17.28.120 as described in more detail in Section 5.1 above.

7 MINOR SUBDIVISION

The expansion of the existing Louisville Substation requires additional land to be added to the subject property to provide for the additions proposed by the Project to the Louisville Substation. To expand the subject property, Xcel Energy will use the a Minor Subdivision process, to enlarge and consolidate the existing 1.72-acre Property by 0.59 acres to create a larger 2.31-acre Property instead of creating a standalone parcel. Section 16.12.110.C.4 of the Code states an applicant is eligible to use a Minor Subdivision process so long as:

> *"The subdivision is of a lot, previously created by an approved final subdivision plat, which is split or subdivided into no more than two lots and the lots created by the split comply with the applicable dimensional requirements of the city's zoning regulations"*

The proposed minor subdivision creates no new lots and only enlarges the subject property by 0.59 acres and reduces the Redtail Ridge PUD parcel by 0.59 acres. The application is essentially a boundary line adjustment. In addition, the Project includes a lot that was previously approved by a final subdivision plat. That subdivision is not being further subdivided by more than two lots and the newly enlarged lot will meet the applicable dimensional requirement of the Code. Therefore, a Minor Subdivision process should apply to the Project.

6.1 MINOR SUBDIVISION APPROVAL PROCESS

Per Section 16.12.110 of the Code, an applicant may apply through the Minor Subdivision procedure by submitting all the applications and information required in this title for consideration of a subdivision. The planning commission shall hold a public hearing after notice is given, as set forth in Section 16.04.070, concerning such minor subdivision and may give approval of a final plat at that time. The requirement of filing a

preliminary plat and holding a public hearing thereon is waived under this process. The planning commission, after holding a public hearing, shall approve, disapprove, or approve such final plat with modifications and submit the plat together with the commission's recommendations to the city council.

Following receiving the plat and recommendations of the planning commission, the city council shall approve, disapprove, or refer the plat back to the planning commission for further study. When the plat is accepted, the plat shall be signed by the mayor and attested by the city clerk. The city clerk shall then record the plat as provided for other subdivisions in this chapter.

6.2 MINOR SUBDIVISION REVIEW CRITERIA (SEC. 16.04.020) ANALYSIS

The regulations in this title are designed and enacted in accordance with the authority granted to the city including, but not limited to, subdivision authority granted in C.R.S. § 31-23-201 et seq. and the land use authority granted in C.R.S. § 29-20-101 et seq., the “Local Government Land Use Control Enabling Act of 1974,” for the following purposes:

A. *To promote the health, safety, convenience, order, prosperity and welfare of the present and future inhabitants of the city;*

   The Project helps to promote the health, safety, convenience, order, prosperity, and welfare of the present and future inhabitants of the City by providing safe and reliable electricity to residents and surrounding businesses, which electricity is paramount to the continued success of the residents and businesses within Louisville.

B. *To provide for the proper arrangement of streets in relation to existing or planned streets and to the comprehensive plan;*

   The Project does not require public streets. This purpose is not applicable to the Project.

C. *To provide for adequate and convenient open spaces for motor vehicle, pedestrian and bicycle traffic, utilities, access of firefighting apparatus, civil defense, recreation, and sites for schools, educational facilities, and related structures;*

   The Project does not require public streets. This purpose is not applicable to the Project.

D. *To promote orderly growth and to provide for the harmonious development of the city in accordance with its comprehensive plan;*

The Project expands the existing Xcel Energy substation, which has been in operation since 1982. The subject property is surrounded on all property boundaries by the Redtail Ridge PUD, a PUD that is seeking final approval from Louisville by late fall 2025. The Redtail Ridge PUD includes the boundaries of the substation expansion occurring in the manner presented in this application.

E. To provide for adequate light, air and privacy and to secure safety from fire, flood and other danger;

Xcel Energy substations are designed with safety being the top priority. The Project is not accessible to the public and has been designed to be protected from fire, flood, and other danger. Keeping the public out of substations is important, as substations house critical, important, and potentially dangerous electrical equipment that needs to be kept secure. Fires at substations are very rare. Xcel Energy's substations and transmission lines are monitored and controlled remotely from an operations center, where event response is coordinated. In the rare event of an emergency, Xcel Energy will likely be aware of an issue before the public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999. Unauthorized personnel, including emergency responders, should not approach the facilities and should not touch the electric lines or anyone/anything in contact with them. In the event of an outage or transformer failure, the affected substation equipment is immediately de-energized by the breaker equipment, and Xcel Energy personnel are dispatched to the site. Xcel Energy personnel receive safety training for emergency situations relating to high-voltage electrical equipment. Xcel Energy also coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders based on national standards through the Responding to Utility Emergencies Program.

F. To avoid congestion of population and to provide for the proper distribution of population and supportive land uses;

The Project is supportive of planned residential and commercial growth within Louisville. The Project is critical in the provision of electricity to current and future users within Louisville and is a critical component of supporting population growth to supportive land uses as laid out by Louisville.

G. To ensure that public facilities and services are available and will have sufficient capacity to serve the development;

The Project includes additions and expansion to the existing substation facility in order to ensure that sufficient capacity to serve future developments in Louisville, including the Redtail Ridge PUD, is available.

H. To protect the character and the social and economic stability of all parts of the city;

The Project furthers the continued supply of reliable and safe electricity to Louisville residents and businesses. A safe and reliable source of electricity is paramount to maintaining social and economic stability in all parts of the City and this Project ensures a safe and reliable source of electricity to the residents and businesses of the City.

I. To conserve and enhance the value of land throughout the city and the value of buildings and improvements upon the land;

The Project proposes additions to the existing substation and includes an expansion of the subject property to provide for the additions necessary to continue to provide safe and reliable electricity to surrounding residences and businesses. Land value throughout the city, including the value of existing buildings and future improvements upon the land is reliant on Xcel Energy providing an adequate supply of electricity. Provision of core utilities like electricity is paramount to maintaining baseline values of land throughout the city.

J. To minimize the conflicts among the uses of land and buildings placed on the land;

The subject property, including the expansion area, is surrounded on all property boundaries by the Redtail Ridge PUD, a PUD that is in final processing with Louisville and is anticipated to be accepted by the City by late fall 2025. The Redtail Ridge PUD incorporates the Project into the PUD and has been designed to minimize any conflicts between the proposed land uses shown in the Redtail Ridge PUD and the existing Louisville Substation.

K. To provide for the safe and efficient circulation of traffic throughout the city, the avoidance of congestion in the streets and highways and along pedestrian and bikeways;

The Project for safety reasons is not accessible to the public. No streets, highways, pedestrian infrastructure, or bikeways will be created by the Project.

L. To provide reasonable standards in order to further the orderly layout of land and to ensure proper legal descriptions and monumenting of subdivided land;

The Minor Subdivision application includes proper legal descriptions and monumenting of subdivided land to ensure the orderly layout of land.

M. To mitigate the pollution of air, streams and ponds, assure the adequacy of drainage facilities, safeguard the water table, and encourage the wise use and management of the natural environment;

The Project impact on the water table, air, streams, and ponds is minimal, as substations produce very little in terms of air pollution and have minimal impact to stormwater. The Louisville Substation does not use water and will not impact the water table. Furthermore, the surrounding Redtail Ridge PUD provides adequate drainage facilities to account for the Project, and drainage impacts from the subject property are not anticipated. The Louisville Substation is supportive of continued renewable energy development in the State of Colorado and the additions to the Louisville Substation add capacity to the substation to deliver energy developed by renewable energy sources to consumers with Louisville.

N. To preserve and enhance to the extent reasonably possible the natural beauty and topography of the city and areas of historical or archeological importance and to ensure appropriate development with regard to such natural, historical and archaeological sites and features;

The subject property has been a substation since 1982, and the proposed additions and expansion of the Louisville Substation will not change the use and nature of the subject property from what has historically been. Impacts to natural beauty and topography of the city do not change from this Project as the substation has been in this location for over 40 years and is not located near any areas of historical or archeological importance.

O. To regulate the use of land within the city on the basis of the impact thereof on the community or surrounding areas;

The Project does not impact the community or surrounding areas as it is an existing substation use and the additions and expansion to the substation do not represent a change to the historic use of the subject property. The Redtail Ridge PUD surrounds the subject property on all property boundaries and the Redtail Ridge PUD has planned for the continued use of the substation in its current location, including the expansion area. Impacts to the community are minimal as the expansion and additions do not fundamentally change the existing use of the subject property.

P. To regulate the location of activities and developments which may result in significant changes in population density;

The Project proposes no residential development and has no impact on population density.

Q. To provide for phased development of services and facilities;

The Project is relatively small and will be completed in one phase.

R. To help assure that growth bears a reasonable share of the costs thereof; and

The Project, due to the relatively small area of new disturbance and improvements, does not represent growth that requires cost-sharing outside of those direct costs associated with the additions to the Project. No permanent traffic is generated by the Project and no additional utilities are required for the Project.

S. To otherwise plan for and regulate the use of land so as to provide planned and orderly use of land and protection of the environment in a manner consistent with constitutional rights.

The Project has been included in relevant planning documents, including the surrounding Redtail Ridge PUD, and has been provided in an orderly manner consistent with constitutional rights.

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