

# **Exhibit I: Comment and Response Document**

North Metro Natural Gas Pipeline Project  
Routing Study

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**Adams County Community & Economic Development Department  
Development Review Team Comments  
North Metro Natural Gas Pipeline Project**

**Date:** 8/9/2016

**Project Number:** PRE2016-00055

**Project Name:** Public Service Company of Colorado

**Note to Applicant:** The following review comments and information from the Development Review Team is based on the information you submitted for the Conceptual Review meeting and applicable to the submitted documents only. The Development Review Team review comments may change if you provide different information during the scheduled Conceptual Review meeting date. Please contact the case manager if you have any questions.

Commenting Division: Building Review  
Name of Reviewer: Justin Blair  
Date: 07/26/2016  
Email: jblair@adcogov.org

*No Comment.*

**PSCo Response:**

No response necessary.

Commenting Division: Engineering Review  
Name of Reviewer: Greg Labrie  
Date: 08/01/2016  
Email: glabrie@adcogov.org

**Complete. Eng10:** *Contaminated soil has been found in the area along Washington Street south of 55th Avenue and around the Crossroad Commerce Park facility. Adams County has developed a Material Management Plan that shall be used for any new construction within this area. The applicant shall consult with Adams County Development Engineering to obtain this plan and incorporate into the design and construction of the pipeline within this area.*

**PSCo Response:**

The handling of potentially contaminated materials during construction of the Project is discussed in Section 2.12.1.11 of this application. Based on previous experience with utilities in Adams County, PSCo is aware of the presence of soil contamination along Washington Street, and consulted with Mr. Fonda Apostolopoulos at CDPHE about the potential issues in the area on October 20, 2016. As instructed by Mr. Apostolopoulos at that time, PSCo will develop a pipeline route-specific Materials Management Plan to assure that materials are managed and work is conducted in accordance with state, local, and federal regulations. For the preparation of the route-specific plan, PSCo will refer to the Adams County Materials Management Plan to assure their work is conducted in a manner consistent with the County's plan.

**Eng11:** *The Adams County Transportation Department has recently completed major roadway improvements along Washington Street. Any new development that will have a negative impact on these improvements will require stringent mitigation requirements.*

**PSCo Response:**

PSCo has minimized the route distance along Washington Street to the extent possible and the proposed pipeline route is located along a roadway west of Washington Street south of East 55th Avenue as discussed in Section 2.4.2 of this application. Damage to pavement and other roadway features would be restored to existing conditions as documented in Section 2.4.3.1 of this application.

Commenting Division: Engineering Review

Name of Reviewer: Matthew Emmens

Date: 08/09/2016

Email: memmens@adcogov.org

**Complete. REVISED COMMENT: ENG5:** *Adams County discourages the placement of large, high pressure and/or, transmission pipelines within the County's Right-of-Way, excepting perpendicular crossings. Future roadway improvements, including raising or lower of the street grade could affect the pipelines operation. If the County does improve the roadway in the future, the pipeline owner shall be required adjust the location of the pipeline at their expense. Adams County will not accept responsibility for losses or incurred costs to the pipeline owner due to the County performing roadway improvements within an existing County ROW.*

**PSCo Response:**

Due to the urban and dense development in the area of the proposed Project, the use of County ROW cannot be avoided. Numerous routing alternatives have been considered as discussed in Section 2.4.2 of this application. PSCo has noted the County concerns regarding roadway improvements and potential losses or incurred costs in relation to the proposed Project.

Commenting Division: Engineering Review

Name of Reviewer: Greg Labrie

Date: 08/01/2016

Email: glabrie@adcogov.org

**Complete. ENG1:** *The proposed project is shown on the following Flood Insurance Rate Maps (FIRM's): FIRM Panels for the proposed routes are: 08001C0603H, 08001C0604H, 08001C0611H and 08001612H. Federal Emergency Management Agency, panels dated March 5, 2007.*

*According to the above references, portions of the proposed pipeline in each of the alternative routes WILL be located within a delineated 100-year flood hazard zone; a floodplain use permit will be required.*

**PSCo Response:**

As discussed in Sections 2.5.2 and 2.12.1.5 of this application, a Floodplain Use Permit and a no-rise certification would be obtained from Adams County for construction of the natural gas pipeline and

pipeline facilities including the proposed regulator station located in the South Platte River 100-year floodplain area. Design of proposed Facility 958 at Cherokee Station would maintain the base elevation at existing conditions.

**ENG2:** *The applicant shall be responsible to ensure compliance with all Federal, State, and Local water quality construction requirements. The alternative route that include the pipeline installation along Washington Street and the pipeline route along Washington and Logan Street are located within the County's MS4 Stormwater Permit area. The applicant shall be responsible to prepare the SWMP plan using the Adams County ESC Template, and obtain both a County SWQ Permit and State Permit COR-030000 for these two route alternatives. The alternative pipeline route along Broadway is outside the MS4 Permit area and the use of erosion and sediment control BMPs are expected for this alternative route.*

**PSCo Response:**

This application proposes one pipeline route through Adams County as discussed in Section 1.1. The alternative pipeline route along Broadway was dismissed as discussed in the Routing Report provided in Exhibit C. During construction of the proposed Project, stormwater would be managed through implementation of a state-approved SWMP and a county-approved Erosion and Sediment Control Plan. PSCo will Comply with all Federal, State, and Local water quality construction requirements and obtain all necessary State and County Stormwater and Water Quality permitting as discussed in Sections 2.5.2 and 2.12.1.3.

**ENG3:** *Prior to issuance of construction permits, the developer is required to submit for review and receive approval of all construction documents (construction plans and reports). Construction documents shall include, at a minimum, site plan(s) and profile(s) showing the specific location of the pipeline, both horizontally and vertically, in any area within the Adams County jurisdiction. All construction documents must meet the requirements of the Adams County Development Standards and Regulations. The developer shall submit to the Adams County Development Review Engineering division the following: Engineering Review Application, three (3) copies of all construction documents. There is no development review fee for utility projects.*

**PSCo Response:**

PSCo would obtain all necessary construction permits from Adams County for construction of the Project. Construction documents would be completed to meet the requirements of the Adams County Development Standards and Regulations. Section 2.5.2 of the application discusses County permits that are necessary and would be obtained prior to Project construction.

**ENG4:** *There are some sections of the various proposed pipeline routes that run through the City and County of Denver. Adams County cannot permit or approve the pipeline location or construction in these areas. The developer is responsible for meeting all requirements of other jurisdictions. The applicant shall only submit the detailed design and construction drawings for the segment of pipeline within Adams County jurisdiction.*

**PSCo Response:**

Comment noted. PSCo is working with the City and County of Denver to obtain necessary permits for the proposed Project in their jurisdiction.

**ENG6:** *The developer is responsible for the repair or replacement of any broken or damaged County infrastructure damaged by the construction of this project.*

**PSCo Response:**

As discussed in Section 2.8.3, PSCo's construction contractor would comply with all applicable federal, state, and local mitigation requirements with the intent to avoid any adverse effect on traffic safety, operation, maintenance, and aesthetic quality of the county road and state highway systems. PSCo would repair or replace any County infrastructure damaged by construction of the proposed Project as discussed in Sections 2.4.3, 2.4.4, and 2.12.1. Specific mitigation discussions are included in the following Sections: 2.4.3, 2.4.4, and 2.8.3; and by individual resources in Section 2.12.1.

**ENG7:** *The proposed project alignment(s) are within the boundaries of the following regional drainage studies: 54th and Pecos OSP-1989, Clear Creek MDP Phase A- 2007, and Globeville Utah Junction, Watershed- 2000. For the regional drainage facilities mentioned in the studies listed above, it is recommended that the applicant either avoid them or install the line to a depth below the facility to provide sufficient cover and avoid potential utility conflicts.*

**PSCo Response:**

Public infrastructure, including drainage structures and features have been avoided to the extent possible as discussed in Sections 2.4.2 and the Routing Report provided in Exhibit C. The Project alignment sheets that include available existing utilities are provided in Exhibit B. As discussed in Section 3.2, the proposed Project would not disrupt existing utility services. As discussed in Section 2.5.2, the ROW/Access permit process would include detailed design drawings that would require County review and approval. PSCo would coordinate with Adams County to avoid impacts to drainage infrastructure.

**ENG8:** *Full street closings are generally not allowed within Adams County, unless approved by Construction Management. It is recommended that street crossing be bored, when possible, to prevent street closures (even partial closures).*

**PSCo Response:**

Section 2.4 includes a discussion of areas that would be bored – including areas within street ROWs and street crossings. Table 4 provides a list of all street crossing in Adams County and expected direct and indirect impacts during construction. As stated in Section 2.5.2, PSCo's construction contractor would obtain ROW and access permits as required by CDOT, Adams County, USACE, and railroad companies prior to start of construction.

**ENG9:** *All work within County ROW, properties or County regulated floodplains will require construction permitting.*

**PSCo Response:**

As discussed in Sections 2.5.2 and 2.12.1.5 of this application, a Floodplain Permit and a no-rise certification would be obtained from Adams County for construction of the natural gas pipeline and pipeline facilities including the proposed regulator station located in the South Platte River 100-year floodplain area. Design of the Facility 958 will maintain the base elevation at existing conditions.

Commenting Division: Environmental Analyst Review

Name of Reviewer: Jen Rutter

Date: 07/28/2016

Email: jrutter@adcogov.org

**Complete. ENV1:** *One of the routes depicted in the project goes through the ASARCO Globe site (Crossroads at Commerce Park), which has an environmental covenant on the land. If allowed at all and if this route is chosen, special care will need to be taken when going into the subsurface.*

**PSCo Response:**

PSCo consulted with Mr. Fonda Apostolopoulos on October 20, 2016 related to the pipeline route proposed through the ASARCO Globe site. The pipeline route is not planned to go through the buried and capped soil repository, but instead is planned to follow the street south of 55th Avenue and west of Washington, clearly outside of the area of contaminated soil. The final plat of the Crossroads Commerce Park subdivision (ASARCO Globe site) includes a dedicated utility corridor that the proposed Project would follow. The handling of potentially contaminated materials during construction of the Project is discussed in Section 2.12.1.11 of this application. PSCo will develop a pipeline route-specific Materials Management Plan to assure that materials are managed and work is conducted in accordance with state, local, and federal regulations. For the preparation of the route-specific plan, PSCo will refer to the Adams County Materials Management Plan to assure their work is conducted in a manner consistent with the County's plan.

Commenting Division: Parks Review

Name of Reviewer: Aaron Clark

Date: 07/28/2016

Email: aclark@adcogov.org

**Complete. PRK1:** *One of the proposed routes for this pipeline passes down Washington Street and past the Heron Ponds natural area, which is managed by the City of Denver. If this alternative is chosen, please consult with Denver regarding Heron Ponds.*

**PSCo Response:**

The preferred route is not located within the vicinity of the Heron Ponds natural areas. PSCo has consulted with the CCD Parks and Recreation regarding park properties in the vicinity of the proposed project. If the alternative route is used, further consultation with CCD in specific regards to Heron Ponds will be completed.

Commenting Division: Parks Review  
Name of Reviewer: Aaron Clark  
Date: 07/26/2016  
Email: aclark@adcogov.org

*No Comment.*

**PSCo Response:**

No response necessary.

Commenting Division: Planner Review  
Name of Reviewer: Chris LaRue  
Date: 08/01/2016  
Email: clarue@adcogov.org

**Complete. PLN1:** *This is a request to install approximately 2.8 miles (5 miles total) of a new 24 inch natural gas pipeline from a new regulator station to be located on the Cherokee plant to a new regulator station in the City of Denver. The purpose of the line is for providing natural gas to residential, commercial, and industrial customers in the region.*

**PSCo Response:**

No response necessary. See updated Project description in Section 1.0 of the application.

**PLN2:** *Please provide greater detail on the regulator Station to be located at the Cherokee Plant. The plan shows it would be located off of York Street on the southeast corner of the plant. What would this infrastructure look like and how would be screened along the street?*

**PSCo Response:**

The infrastructure for Facility 958 is described in Section 2.12.1.2. Facility 958 would be located adjacent to an existing regulator station on the Cherokee Generating Station property. Facility 958 would be seen in the context of the existing regulator station and would appear as an extension of the existing facility, therefore, introducing incremental change to the landscape setting. This area is not visually sensitive due to the density of existing industrial development and because Facility 958 would only be introducing incremental change in the landscape and screening along the street is not necessary.

**PLN3:** *Also planned would be a midpoint valve set. Where is the location of this infrastructure?*

**PSCo Response:**

The locations and specifications of the two alternative mid-point valve sets are discussed in Sections 1.1 and 2.4.1 of this application. It is noted that only one of the alternative locations is within Adams County.

**PLN4:** *The pipeline would occupy a permanent 50 foot easement. There is planned to be an additional 25 foot temporary construction right-of-way.*



**PSCo Response:**

As discussed in Section 2.4.3.1, surface disturbance generally would be limited to a temporary construction ROW in addition to the permanent pipeline ROW. Due to the urbanized nature of the Project area, the pipeline permanent and temporary ROW width could be limited in some areas of the route. Most of the proposed pipeline route is located within public ROW and private property easement would only be necessary in a few locations of the proposed pipeline route as discussed in Section 2.4.1.1. Alignment sheets that show the proposed route and property boundaries are provided in Exhibit B. PSCo would submit detailed construction drawings for review and approval during the Adams County ROW/Access permit process.

*PLN5: There are concerns about the ability to secure a 50 foot permanent easement though such a heavily developed area. Can you provide more information about this?*

**PSCo Response:**

As discussed in Section 2.4.3.1, due to the urban and dense development in the area of the proposed Project, most construction work and temporary use areas area planned for public street ROW. Permanent and temporary ROW would be obtained as practicable and PSCo is conducting easement negotiations with landowners. Most of the proposed pipeline route is located within public ROW and private property easement would only be necessary in a few locations of the proposed pipeline route as discussed in Section 2.4.1.1. Documentation of all easements, permits, and approvals would be provided to Adams County, Department of Planning and Development, prior to construction. Alignment sheets for the proposed pipeline route are provided in *Exhibit B*.

*PLN6: Have you performed any outreach to private property owners regarding this project?*

**PSCo Response:**

As discussed in Section 2.4.6 and in Exhibit E, a public open house was held in October 2016 and included invitations to all property owners in the vicinity of the proposed Project. The parcel list of properties crossed by the proposed and alternative route in Adams County are shown in Exhibit A.

*PLN7: This request will be governed by Chapter 6 of the Development Code which addresses Regulations Governing Areas and Activities of State Interest. Specifically a permit is required for site selection and construction of Major Facilities of a Public Utility (Section 6-06-01(3)).*

**PSCo Response:**

As described in Section 1 of this application, this application is intended to satisfy the Regulations Governing Areas and Activities of State Interest - most specifically a permit is required for site selection and construction of Major Facilities of a Public Utility (Section 6-06-01(3)).

*PLN8: Section 6-02-44 Major Facilities of a Public Utility is defined as:*

- a. Transmission lines, power plants, and substations of electrical utilities; and*
- b. Pipelines and storage areas of utilities providing natural gas or other petroleum derivatives.*
- c. Wind farms and associated equipment.*

**PSCo Response:**

This application is submitted per part “b” of the Section 6-02-44 Major Facilities of a Public Utility definitions as stated in Section 1 of this application.

**PLN9:** Review Section 6-07 which details the permit application process. This section will require submittals of the following:

- a. Fees;
- b. Information describing the applicant;
- c. Information describing the project;
- d. Property right, permit and other approvals;
- e. Financial feasibility of the project;
- f. Land use;
- g. Local government services;
- h. Financial burden on County residents;
- i. Local economy;
- j. Recreational opportunities; &
- k. Environmental Impact Analysis;

**PSCo Response:**

These requirements are addressed in this application as follows: Fees (Section 2.2); Information describing the applicant (Section 2.3); Information describing the project (Section 2.4); Property right, permit and other approvals (Section 2.5); Financial feasibility of the project (Section 2.6); Land use (Section 2.7); Local government services (Section 2.8); Financial burden on County residents (Section 2.9); Local economy (Section 2.10); Recreational opportunities (Section 2.11); and Environmental Impact Analysis (Section 2.12).

**PLN10:** Six additional submittal requirements are required for major facilities of a public utility and are listed within Section 6-08-02. Each point shall be addressed.

**PSCo Response:**

Additional submittal requirements for major facilities of a public utility are addressed in Section 3 of this application.

**PLN11:** Prior to an application submittal a neighborhood meeting is necessary to address any concerns from the community in the area. Any concerns should be incorporated into the application. Please review Section 2-01-02, Neighborhood Meetings to ensure your neighborhood meeting will comply with our requirements. That section talks about location of the meeting, notice of the meeting, and format. Areas and Activities of State Interest permit outreach meetings are also governed by Section 6-07-02-12.

**PSCo Response:**

As discussed in Section 2.4.6 and in Exhibit E, a public open house was held in October 2016 and included invitations to all property owners in the vicinity of the proposed Project. It is noted that there were no comments received during the Neighborhood Meeting process.

**PLN12:** *Prior to an application submittal Section 6-07-02-12 requires an applicant to notify referral agencies and solicit comments. The Applicant shall respond to all of the referral comments and that response shall be included as part of the application. This referral process is required, along with all other application submittal requirements, in order for an application to be considered complete. The referral entities shall have 30 days to respond.*

**PSCo Response:**

This comment response document addresses and responds to the referral comments received from Adams County referral Divisions. This comment response document is being submitted as Exhibit I of the 1041 application.

**PLN13:** *Per Section 6-11, the Board of County Commissioners is the final decision authority to review and approve/deny an Areas and Activities of State Interest request. Per the noted section the requests are reviewed by the Planning Commission as well.*

**PSCo Response:**

Comment noted.

**Complete. PLN14:** *The project would traverse through properties located in the Industrial and Commercial future land uses.*

*Industrial areas are intended to provide a setting for a wide range of employment uses, including manufacturing, warehouses, distribution, and other industries. These areas may also include limited supporting uses such as retail, outdoor storage. Key considerations at the edges of industrial areas include limiting or buffering noise, vehicle, appearance, and other impacts of industrial uses on nearby nonresidential uses.*

*Commercial areas in the County are intended to serve either neighborhood or regional needs and can be comprised of a variety of uses, including retail sales, restaurants and other services, and professional and commercial offices. The primary objective of the Commercial land use designation is to support and attract businesses that provide employment opportunities, meet the needs of County residents and visitors, and contribute to the County's tax base.*

**PSCo Response:**

Section 2.7.1 discusses land use and zoning in the area of the proposed Project. The proposed Project is located in Industrial-1 (I-1), Industrial-2 (I-2), and Industrial-3 (I-3) districts, as well as a Planned Unit Developed (PUD) in Adams County. Utility substations or transmission and distribution facilities are a conditional use allowed in I-1, I-2, and I-3 districts. The route follows the linear road feature in these districts and would not impact present or future land uses.

**PLN15:** *The project would appear to primarily impact industrially zoned properties (I-1, I-2, & I-3).*

- *The purpose of the Industrial-1 (I-1) District is to provide a general commercial and restricted industrial district designed to provide for a variety of compatible business, warehouse, wholesale, offices and very limited industrial uses.*
- *The purpose of the Industrial-2 (I-2) District is to accommodate light manufacturing, processing, fabrication, assembly, and storage of non-hazardous and/or non-obnoxious material and products as well as allowing service facilities for industries and their employees.*
- *The purpose of the Industrial-3 (I-3) District is to provide a heavy industrial district designed to accommodate most industrial enterprises.*

**PSCo Response:**

Section 2.7 of this application discusses land use and zoning in the area of the proposed Project.

*PLN16: One alignment option would traverse through the Crossroad Commerce Park PUD. This site contains contamination and to our knowledge is restricted as to the type of development that could be allowed. Staff would be unfavorable to this option.*

**PSCo Response:**

The final plat of the Crossroads Commerce Park subdivision (ASARCO Globe site) includes a dedicated utility corridor that the proposed Project would follow. The handling of potentially contaminated materials during construction of the Project is discussed in Section 2.12.1.11 of this application. Based on previous experience with utilities in Adams County, PSCo is aware of the presence of soil contamination along Washington Street, and consulted with Mr. Fonda Apostolopoulos at CDPHE about the potential issues in the area on October 20, 2016. As instructed by Mr. Apostolopoulos at that time, PSCo will develop a pipeline route-specific Materials Management Plan to assure that materials are managed and work is conducted in accordance with state, local, and federal regulations. For the preparation of the route-specific plan, PSCo will refer to the Adams County Materials Management Plan to assure their work is conducted in a manner consistent with the County's plan.

*PLN17: All of the alignments will traverse through heavily developed industrial portions of the County. Likewise, the alternatives would traverse through East 62nd Avenue and either Broadway or Washington Streets. An option from Washington Street would appear to impact 58th Avenue, Logan Court, and 56th Avenue. This project could have the potential to disrupt existing businesses and developments. A plan would need to be developed regarding this issue. Outreach to all the property owners and businesses would be essential.*

**PSCo Response:**

As discussed in Section 2.4.6 and in Exhibit E, a public open house was held in October 2016 and included invitations to all property owners in the vicinity of the proposed Project. It is noted that there were no comments received during the Neighborhood Meeting process. A communications plan would be prepared for the Project during the permitting process and prior to the initiation of construction activities as discussed in Section 2.4.6 of this application. The communication plan would include notification and coordination activities with businesses, residences and other Project stakeholders. The project channels of communicating would include a Project email address, Project hotline number and a Project-specific website. The Project channels of communication would be maintained through the permitting,

construction and restoration of sites processes. Project information would be provided in English and Spanish.

***PLN18:** The Broadway Street alignment would cross I-25. Please coordinate with CDOT and obtain their input.*

**PSCo Response:**

Crossing of federal highways would require CDOT permitting as discussed in Section 2.5.2. However, the proposed and alternative routes submitted for the 1041 would not cross any federal highways in Adams County.

***PLN19:** Greater detail would be required on the temporary staging areas and their uses. There would be concerns about how these areas would be screened and potential negative impacts mitigated.*

**PSCo Response:**

Temporary staging areas are shown on the Alignment Sheet maps included in Exhibit B. These areas are described in detail in Section 2.8.3 and potential visual impacts are discussed in Section 2.12.1.2.

***PLN20:** The site would be required to conform to the County's landscaping requirements. Section 4-16 lists the required landscaping requirements. Please demonstrate how you will meet these requirements. Landscaping and screening is most important where there is surface development as part of the project. Landscaping should be replaced on private property should it be impacted by this development.*

**PSCo Response:**

The natural gas pipeline would be installed in a trench or by boring, and ultimately be buried underground, therefore, landscape and screening requirements would only be applicable to above-ground facilities (i.e. Facility 958 and potentially one valve set). Section 2.12.1.2 of this application describes the existing landscape setting of the above-ground facilities and the visual affect once the facilities have been implemented. Both facilities would be located in highly industrialized areas, surrounded by industrial and commercial development.

Facility 958 would be seen in the context of an existing regulator station adjacent to the Cherokee Generating Station and would appear as an extension of the existing facility. In addition, Facility 958 would be located entirely within the fenced area of the existing regulator station facility. Due to the industrialized nature of the existing landscape setting and the incremental changes anticipated from the introduction of Facility 958, no landscaping or screening is proposed at this location.

The proposed Adams County alternative valve set would comprise an area of approximately 50 feet by 100 feet and would include aboveground piping and a perimeter fence. PSCo will work with the landowner of the parcel on which the valve set is to be located on, to ensure that the proposed facility will be compatible with the adjacent business park. The valve set would be located on a parcel currently zoned Industrial-3 District (I-3). The valve set will be designed to meet the requirements for the I-3 zone district as outlined in Section 3-25-07 and applicable landscape and screening requirements as outlined in Section 4-10 of the Adams County Development Standards and Regulations.

**PLN21:** *Portions of the alignment would traverse through the Flammable Gas Overlay (FGO). Please review Section 3-35 and ensure compliance.*

**PSCo Response:**

Section 2.12.11.1 of this application discusses the FGO in relation to the proposed Project. PSCo is aware that the proposed pipeline route traverses an area mapped in an Adams County Flammable Gas Overlay (FGO) district in the same area as the ASARCO Globe site. PSCo would coordinate with the County to include any necessary protocols listed in Chapter 3.35 of the Zoning Code in the Project-specific MMP. As described in the application, construction and operation of the Project would comply with the requirements for the FGO district.

**PLN22:** *Please utilize the following link to access our land use permits:*

<http://www.adcogov.org/index.aspx?NID=1475>

**PSCo Response:**

PSCo has accessed the above link as well as other available Adams County government on-line information for the preparation of this permit application.

Commenting Division: ROW Review

Name of Reviewer: Robert Kovacs

Date: 08/01/2016

Email: rkovacs@adcogov.org

**Complete. ROW1:** *Pipelines should be located in easements on private property.*

**PSCo Response:**

Due to the urban and dense development in the area of the proposed Project, the use of County ROW cannot be avoided. Numerous routing alternatives have been considered as discussed in Section 2.4.2 of this application and in the Routing Report provided in Exhibit C. PSCo has noted the County concerns regarding roadway improvements and potential losses or incurred costs in relation to the proposed Project. Private easement will be sought in several locations along the proposed Project in Adams County, and are shown with owner names in Exhibit B.

**ROW2:** *Said easements should be placed outside of the ultimate Right-of-ways of County roads as delineated by the Adams County Transportation Plan, approved 2012.*

**PSCo Response:**

Due to the urban and dense development in the area of the proposed Project, the use of County ROW cannot be avoided. Numerous routing alternatives have been considered as discussed in Section 2.4.2 of this application and in the Routing Report provided in Exhibit C. PSCo has noted the County concerns regarding roadway improvements and potential losses or incurred costs in relation to the proposed Project.

**ROW3:** *Crossings of County roads should be as near as possible to right angles and County Engineering staff should review.*

**PSCo Response:**

County road crossing details would be included in the ROW/Access permit as discussed in Section 2.5.2 of this application and PSCo would design the pipeline to conform with the County request to the extent feasible.

**ROW4:** *Permits to construct in the Right-of-way should be secured for constructing crossings of County roadways.*

**PSCo Response:**

Most of the proposed pipeline route is located within roadway ROW including roadway crossings. These areas are discussed in Section 2.4.1. As discussed in Section 2.5.2 and 2.8.3 of this application, PSCo would obtain a ROW/Access Permit from the Adams County Public Works Department prior to the initiation of construction activities.