



Land Use and Building Department
8999 Independence Way #100 • Alamosa, CO 81101
Email: landuse@alamosacounty.org • Phone: 719-589-3812

September 23, 2025

Adapture Renewables, Inc.
Attn: Luis Meneses
1901 HARRISON ST, STE 1630
Oakland, CA 94612, USA

lmeneses@adapturere Renewables.com

RE: Comments on Final 1041 Application for Major Facilities of a Public Utility

Attached are comments from our review of your final application submitted August 1, 2025. These reflect analysis by our third-party review firm Logan Simpson, as well as comments from other partner agencies and entities, including CPW. If you have any specific questions on these comments, please let me know and we can schedule a conference call with Logan Simpson to discuss.

As you will see from the included spreadsheet, this application is nearly complete. However, before determining that and setting a hearing date, I wanted to provide you the opportunity to review and potentially to update or amend certain sections as noted. Once the county determines that the final application is complete and I schedule the public hearing, I request that you not submit additional material as we lack the ability to adequately review and comment on it before the public hearing.

Please let me know if you have any questions.

Sincerely,

Richard Hubler,
Land Use Administrator

cc: email to Matt Press, Adapture Renewables, mpress@adapturere Renewables.com
email to Mike Fitzgerald, Barr Engineering, fitz@barr.com
email to Alison Rohwer, Barr Engineering, ARohwer@barr.com
email to Jason Kelly, Alamosa County Attorney jtkelly@alamosacounty.org

enclosures: Final Application review narrative
1041 Regulations § 6.303 review spreadsheet

Below is our review of the final application of the Haynach Solar Hybrid Project submitted by Barr Engineering Company against the Alamosa County 1041 Guidelines and Regulations. Overall, the permit application is well organized and prepared. The below commentary identifies where the final application does not fully address the submission requirements in the 1041 regulations. Detailed notes, recommendations, and general comments regarding each required component can be viewed on the Permitting Process and Requirements for a Solar PV Project in the table at the end of this document. Only the items highlighted in yellow are deemed to require further evaluation or discussion.

6.303 SUBMISSION REQUIREMENTS FOR A FINAL APPLICATION.

Base Area and Local / Regional Impacts

- Code requirement 2.a.i: Please add discussion of how the site determination was made to the narrative.
- Code requirement 2.a.iii.B: Please add discussion of the relationship of the Project to any special district expansion programs (or confirm that there are none present).

Need for Project/ Support and Costs

- Code requirement 2.a.iv.A: Please elaborate on the necessity of the size and nature for the facility as proposed.
- Code requirement 2.a.v.A: Please elaborate on the type of water quality control that is anticipated to be implemented by the Stormwater Management Plan (SWMP).
- Code requirement 2.a.v.A2: The narrative discusses the potential for implementation of pollutant control measures; please add discussion for seasonal variations (or clarify if they are not anticipated).

Socioeconomic Impacts

- Code requirement 2.a.ix.A.2: Please add discussion of neighborhoods to the narrative or if that information is not available, please state so in the application.
- Code requirement 2.a.ix.D.1: Please add discussion or clarification of dormitories, mobile homes, and locations from the Economic Impact Assessment Section 6.2 "Housing Unit Inventory" if available.

Historical and Archaeological Resources

- Code requirement 2.a.ix.F.1: Please attach the Class III Cultural Assessment and/or the submission letter to SHPO for reference.
- Code requirement 2.a.ix.F.2: Please elaborate on how the historical/ archaeological resources relate to the community.

Biotic Conditions

- Code requirement 2.b.ii.A.3: Please add the current indications of stages in ecological succession to the narrative.
- Code requirement 2.b.ii.B.1: Please add discussion of the relative importance of the species present to the narrative.

Current Utilization of Air and Socio-Economic Resources

- Code requirement 2.e.ii: Please add a description to the narrative of current utilization of air and socio-economic resources in the impact area.

Alternatives

- Code requirement 2.e.vii.D: Alternative measures to those typically approved by CDPHE are not considered. Please elaborate on the possibilities available for air and pollution control.
- Code requirement 2.e.vii.E: Please discuss design alternatives to the ones that are being implemented by the Project.

Other Minor Inconsistencies

We note the following minor inconsistencies in the narrative:

- The numbering in the narrative sections (which would include all subsections or references to these sections throughout the narrative) is inconsistent with the Alamosa County 1041 Regulations. Updates should be made as follows in **Table 1**:

Table 1. Code Reference Corrections

Narrative Code Reference	Actual Reference
2(b)(v)	2(b)(i)
2(b)(v)A	2(b)(i)A
2(b)(v)B	2(b)(i)B
2(b)(v)C	2(b)(i)C
2(b)(v)D	2(b)(i)D
2(b)(v)E	2(b)(i)E
2(b)(v)F	2(b)(i)F
2(b)(vi)A	2(b)(ii)A
2(b)(vi)B	2(b)(ii)B
2(b)(vi)C	2(b)(ii)C
2(c)(v)A	2(c)(i)A
2(c)(v)B	2(c)(i)B
2(c)(v)C	2(c)(i)C
2(c)(v)D	2(c)(i)D
2(c)(vi)A	2(c)(ii)A
2(c)(vi)B	2(c)(ii)B
2(c)(vi)C	2(c)(ii)C
2(c)(vi)D	2(c)(ii)D
2(d)(v)	2(d)(i)
2(d)(vi)	2(d)(ii)
2(d)(vi)A	2(d)(ii)A
2(d)(vi)B	2(d)(ii)B

Narrative Code Reference	Actual Reference
2(d)(vi)C	2(d)(ii)C
2(d)(vi)D	2(d)(ii)D
2(d)(vi)E	2(d)(ii)E
2(d)(vi)F	2(d)(ii)F
2(d)(vii)	2(d)(iii)
2(e)(v)	2(e)(i)
2(e)(vi)	2(e)(ii)
2(e)(vii)	2(e)(iii)
2(e)(viii)	2(e)(iv)
2(e)(viii)A	2(e)(iv)A
2(e)(viii)B	2(e)(iv)B
2(e)(viii)C	2(e)(iv)C
2(e)(viii)D	2(e)(iv)D
2(e)(viii)E	2(e)(iv)E
2(e)(ix)	2(e)(v)
2(e)(x)	2(e)(vi)
2(e)(xi)	2(e)(vii)

- Section 2(e)(vii) requires alignment between the narrative referenced code and the 1041 Regulation section numbers and headers. Please review and adjust the entries and responses to align with the code as follows in **Table 2**:

Table 2. Alignment of Referenced Code to the 1041 Regulations

2(e)(vii)		Describe a program to minimize and mitigate adverse impacts and to maximize the positive impacts of the proposed site selection and construction.
	A	Analyze alternatives
		1 Alternative locations and routes
		2 Alternative types of facilities
		3 Use of existing rights-of-way
		4 Joint use of rights of way with other utilities
		5 Upgrading of existing facilities
	B	Analyze non-structural alternatives as applicable
		1 Conservation of energy use
		2 No development
	C	Analyze management alternatives (i.e. development scheduling, training programs, facility design, land trades, etc.)

	D	Analyze air and water pollution control alternatives
	E	Analyze design alternatives (access, landscaping, architectural controls)
	F	Submit a program to meet "front end" costs of providing necessary services and facilities

6.304 ACTION ON PERMIT APPLICATION

Section 6.304 of the 1041 Regulations state that “The Permit Authority shall deny the permit if the proposed development does not meet all of the criteria.” Below is our analysis of the final submittal against these review criteria. We believe that thirteen (13) of the required criteria have been met and that six (6) of the required criteria have been partially met (a, b, c, d, f, o). The final application would be improved by addressing those items as discussed below.

a) The health, welfare and safety of the citizens of this County will be protected and served.
The Project is not anticipated to negatively impact the health or safety of citizens in Alamosa County. Please elaborate on the water quality control that is anticipated to be implemented and add discussion of pollutant load seasonal variations (or clarify that they are not anticipated). This requirement has been partially met.

b) The natural and socio-economic environment of this County will be protected and enhanced.
Please provide a discussion of neighborhoods to the narrative. Also add discussion specifically of dormitories, mobile homes, and locations to the current housing inventory summary. This requirement has been partially met.

c) All reasonable alternatives to the proposed action, including use of existing rights-of-way and joint use of rights-of-way wherever uses are compatible, have been adequately assessed and the proposed action represents the best interests of the people of this County and represents the best utilization of resources in the impact area.
Please add a description of any alternative types of facilities besides solar that were considered for the Project Site. Add an analysis of air and water pollution control alternatives and an analysis of design alternatives. This requirement has been partially met.

d) A satisfactory program to mitigate and minimize adverse impacts has been presented.
Please add a description to the narrative of the current utilization of air and socio-economic resources in the impact area. This requirement has been partially met.

e) The nature and location or expansion of the facility complies with all applicable provisions of the master plan of this County, and other applicable regional, metropolitan, state, and national plans.
The Project is in conformance with the Alamosa County Master Plan, the Alamosa County Land Use Code, and state and federal plans. This requirement has been met.

f) The nature and location or expansion of the facility complements the existing and reasonably foreseeable needs of the service area and of the area immediately affected by the facility.
Please add discussion of how the site determination was made to the narrative of the application. Add discussion of the relationship of the Project to any special district expansion programs (or confirm that there are none present). Please elaborate on the necessity of the size and nature for the facility as proposed.
This requirement has been partially met.

g) The nature and location or expansion of the facility does not unduly or unreasonably impact existing community services.
The Project will enhance the generation of electric power to the community without projected impacts on existing services. The proximity to Hooper Solar Project facility and the San Luis Valley Substation eliminates the requirement for lengthy transmission lines.
This requirement has been met.

h) The nature and location or expansion of the facility will not create an expansion of the demand for government services beyond the reasonable capacity of the community or region to provide such services, as determined by the Permit Authority.
Additional educational and health services, and facilities are not anticipated to be required by the Project. Substantial tax benefits will be relegated to Alamosa County and special districts during construction and operation.
This requirement has been met.

i) The facility site or expansion area is not in an area with general meteorological and climatological conditions which would unreasonably interfere with or obstruct normal operations and maintenance.
Detailed analysis of meteorological and climatic conditions was waived by the County.
This requirement has been met.

j) The nature and location of the facility or expansion will not adversely affect the water rights of any upstream, downstream, or adjacent communities or other water users.
The Project will not adversely affect water rights of upstream or downstream users. The Project area and associated development will not intersect any mapped or field documented aquatic features and no impacts to these features are anticipated. Wetland permitting, consultation, and/or coordination are not required because no relevant aquatic features exist on the property.
This requirement has been met.

k) Adequate water supplies are available for facility needs.
Project water would be sourced from DWR Permit Numbers 29660-F (WDID 2014189) and 10334-F (WDID 2009110) within Parcel Number Parcel No. 500922100171 and Permit Numbers 17513-F (WDID 2009113) and 17514-F-R (WDID 2009114) respectively, within Parcel No. 5009163000040. These each have a permitted use of approximately 246-480 acre-feet (AF) annually. Project water needs are approximately 200-300 AF during the 16-month construction period for dust suppression and 10 AF annually during Project operations for O&M building water use and periodic panel washing.
This requirement has been met.

l) The nature and location of the facility or expansion will not unduly interfere with any existing easements for rights-of-way, for other utilities, canals, mineral claims, or roads.

The Project will not unduly interfere with any existing easements or rights-of-way. There are several electric distribution and transmission easements within or near the Project area. The Project is designed to avoid these easements. There are no documented occurrences of locatable mineral deposits on or in the immediate area of the Project.

This requirement has been met.

m) The applicant is able to obtain needed easements for drainage, disposal, utilities, access, etc.

There are currently no known needed easements.

This requirement has been met.

n) Adequate electric, gas, telephone, water, sewage, and other utilities exist or shall be developed to service the site.

No new utilities are needed to support the Project site.

This requirement has been met.

o) The nature and location for expansion of the facility will not interfere with any significant wildlife habitat or adversely affect any endangered wildlife species, unique natural resource, or historic landmark within the impact area.

It is recommended to attach the Class III Cultural Assessment and/or the SHPO letter submission for reference and elaborate on how the historical / archaeological resources relate to the community. Please add the current indications of stages in ecological succession of the Project site to the narrative. Add discussion of the relative importance of the wildlife species present to the narrative.

This requirement has been partially met.

p) The nature and location or expansion of the facility, including expected growth and development related to the operation and provision of service, will not significantly deteriorate air quality in the impact area.

Detailed analysis of air quality impacts was waived by the County.

This requirement has been met.

q) The geological and topographic features of the site are adequate for all construction, clearing, grading, drainage, vegetation, and other needs of the facility construction or expansion.

This requirement has been met.

r) The existing water quality of affected state waters will not be degraded below state and federal standards or established baseline levels.

There are no wetlands or waters of the U.S. or of the State of Colorado within the Project site and none will be impacted by the Project.

This requirement has been met.

s) The benefits of the proposed developments outweigh the losses of any natural resources or reduction of productivity of agricultural lands as a result of the proposed development.

Adapture Haynach Solar Hybrid Project
1041 Final Application Review

9/23/2025

Per the application narrative, the socio-economic benefits of the Project, in the form of temporary and permanent employment, generation of sales of goods and services, and local, state, and federal tax revenues over the life of the Project, are significantly higher than are currently generated from the property and the limited current agricultural land use. This requirement has been met.

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference		STEP : Final Application		Present in application?	Sufficient?	Suggested Action/ Notes/ Comments	
(2)				STEP 2: Final Application			
	(a)			At the time of making final application, all applicants shall submit 5 copies of the following documents and information:			
		(i)		Delineation of Base Area (that area likely to be subject to land use changes as a result of the project)			
			A	Map of Base Area; describe how the determination was made	Yes	Partially	Add discussion of how the site determination was made to the narrative.
			B	Map of Special Districts (schools, fire, water sanitation, etc.) affected by the proposal	Yes	Yes	
		(ii)		Delineation of impact area (that area whose physical and socio-economic environment is likely to be impacted, beneficially and adversely, by the site selection and construction of the proposed facility)	Yes	Yes	
		(iii)		Objectives of the proposed site selection and facility			
			A	Describe the relationship of project to local land use policies and comprehensive plans and to policies and plans adopted or under preparation by federal, state and other affected local government agencies.	Yes	Yes	Narrative discusses the Alamosa County Master Plan, Alamosa County Land Use Code, and State level legislature.
			B	Describe the relationship of the project to other existing and planned utility facilities of similar nature, other communication or energy generation and transmission facilities, local government capital improvement programs, and special district expansion programs.	Yes	Partially	Add discussion of the relationship of the Project to any special district expansion programs (or confirm that there are none present).
		(iv)		Description of need for project			
			A	Briefly describe why the public convenience and necessity require the facility of the size and nature proposed be constructed on the site proposed	Yes	Partially	Elaborate on the necessity of the size and nature for the facility as proposed.
			B	Sources of demographic and economic data and method of analysis	Yes	Yes	

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			C	Market function (i.e., What user needs and patterns will project fulfill?)	Yes	Yes	
		(v)		Description of support facilities needed			
			A	Type of water quality control	Yes	Partially	Elaborate on the type of water quality control that is anticipated to be implemented by the Stormwater Management Plan (SWMP).
			1	Describe proposed sewage treatment facilities and nonpoint source controls	Yes	Yes	The Project will require a septic tank and leach/drain field for sewage treatment onsite. No Project site discharge permit is required.
			2	Describe pollutant loads (point and non-point sources) expected directly from development. Specify seasonal variations	Yes	Partially	The narrative discusses the potential for implementation of pollutant control measures; please add discussion for seasonal variations (or clarify if they are not anticipated).
			B	Public services and facilities			
			1	Estimate police and fire protection requirements	Yes	Yes	
			2	Estimate public road maintenance requirements	Yes	Yes	
			3	Estimate educational and health services requirements	Yes	Yes	
			4	Estimate facilities and services required to provide adequate water supply and sewage treatment	Yes	Yes	
		(vi)		Description of employment and economic opportunities			
			A	Describe Capital Investment in facility	Yes	Yes	Section 7.2.1 of the Project Economic Impact Assessment in Attachment 4 cites a detailed description and breakdown of expenditures.
			B	Estimate anticipated revenues to local, state and federal governments, special districts	Yes	Yes	

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			C	Describe employment opportunities.			
			1	Types of jobs and number of positions, wage, salary schedule	Yes	Yes	
			2	Opportunities for employment of local citizens	Yes	Yes	
			3	Employment opportunities for low income and minority populations	Yes	Yes	Please add reference to Section 7.2.3.3 in Attachment 4, Economic Impact Assessment, to the narrative on page 17.
		(vii)		Description of visual conditions (base area)			
			A	Map area within view of project	Yes	Yes	
			B	Map access and travel routes, public areas, residential areas that will have a view of the project	Yes	Yes	
		(viii)		Description of noise conditions (base area)			
			A	Describe and map possible expected noise levels by immediate and future facility operations	Yes	Yes	
		(ix)		Description of socio-economic environment (impact area)			
			A	Characteristics of the existing population.			
			1	Age, income level and distribution, education, social background, family size, etc.	Yes	Yes	
			2	Neighborhood and distinct socio-economic groups	Yes	Partially	Add discussion of neighborhoods to the narrative or if that information is not available, please state so in the application.
			3	Migrational trends and seasonal fluctuations	Yes	Yes	
			4	Anticipated population changes	Yes	Yes	Negligible

Adapture Haynach Solar Hybrid Project
 1041 Final Application Review

9/23/2025

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			B	Current employment.			
			1	Principal employers, type, number of employees	Yes	Yes	
			2	Unemployment and under employment	Yes	Yes	Underemployment details waived due to lack of data.
			3	Characteristics of local labor pool	Yes	Yes	
			4	Manpower training and retraining potential	Yes	Yes	
			C	Inventory local governments and special districts providing services in base area.			
			1	Map jurisdiction and type of service	Yes	Yes	
			2	Capacity and utilization of services	Yes	Yes	
			3	Operating revenue and expenditures	Yes	Yes	
			4	Tax Base	Yes	Yes	
			5	Current level of taxation	Yes	Yes	
			6	Estimate revenue generating capacity and identify potential new sources of revenue	Yes	Yes	Tax impact to Alamosa County present in Table 11-2 "Total Tax Impact to Alamosa County Government".
			D	Housing			
			1	Current housing inventory (including numbers, types, (owner or rental), sales or rental prices, year-round or seasonal, dormitories, mobile homes, and locations)	Yes	Partially	Add discussion or clarification of dormitories, mobile homes, and locations from the Economic Impact Assessment Section 6.2 "Housing Unit Inventory" if available.

Adapture Haynach Solar Hybrid Project
1041 Final Application Review

9/23/2025

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference			STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments	
			2	Projected housing requirements. (including numbers, types, (owner or rental), sales or rental prices, year-round or seasonal, dormitories, mobile homes, and locations)	Yes	Yes	
		E	Existing Transportation Network				
			1	Access to site	Yes	Yes	
			2	Circulation within base area and commuting patterns in impact area	Yes	Yes	
			3	Capacities of arterial streets within impact area	Yes	Yes	
			4	Maintenance provisions and costs	Yes	Yes	Project construction activities and facility operations will generate tax revenues for Alamosa County that will be used, in part, for county road maintenance costs.
		F	Description of historical and archaeological resources				
			1	Describe historical and archeological sites by means of completing state inventory forms and submit these to the State Historical Society for Evaluation	Yes	Partially	Please attach the Class III Cultural Assessment and/or the submission letter to SHPO for reference.
			2	Describe resources individually and as they relate to the community, include photos wherever possible	Yes	Partially	Please elaborate on how the historical/ archaeological resources relate to the community.
		(x)	Description of atmospheric conditions (impact area)				
		A	Meteorology (based on worst-case winter conditions)				
			1	Wind speed and direction	N/A	Waiver approved	
			2	Inversion height	N/A	Waiver approved	
			3	Atmospheric stability	N/A	Waiver approved	
		B	Topography				

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference			STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments	
			1	Describe general and outstanding topographic features in project area (maps and aeriels).	N/A	Waiver approved	
		C		Background ambient air quality (TSP, SO2, HC, CO, Nox, O3, etc.)	N/A	Waiver approved	
	(b)			At the time of final application, applicants seeking a permit for the site selection and construction of transmission lines or substations shall submit, in addition to those requirements set forth in Subsection (a) of this Section, 5 copies of the following documents and information:			
		(i)		Description of geologic and pedologic conditions of base area			
			A	Map of Bedrock and surficial geology	N/A	Waiver approved	
			B	Map and describe areas of:			
			1	Avalanches	N/A	Waiver approved	
			2	Mud flows and debris fans	N/A	Waiver approved	
			3	All types of unstable or potentially unstable slope	N/A	Waiver approved	
			4	Special seismic considerations	N/A	Waiver approved	
			5	Areas of high radioactivity	N/A	Waiver approved	
			6	Ground subsidence	N/A	Waiver approved	
			7	Expansive soil and rock	N/A	Waiver approved	
			8	Other geologic conditions which are pertinent	N/A	Waiver approved	
			C	Map extent of 100-year flood plain if present	Yes	N/A	No floodplain is present in the Project site.

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			D	Map topography in adequate detail to determine adequacy of design	Yes	Yes	
			E	Map and evaluate mineral and energy resources	Yes	Yes	There are no active mines or oil and gas mineral resources present to map in the indirect impact area. Four other existing solar farms are within 5 miles of the site.
			F	Map and evaluate agricultural resources	N/A	N/A	CropScape map is present; potatoes are the predominant crop grown on the site and on adjacent farms.
		(ii)		Description of biotic conditions (impact area)			
			A	Map plant communities	Yes	Yes	
			1	Characteristics, quantity, productivity of plant types	Yes	Yes	
			2	Endangered or threatened plant species	Yes	Yes	There are two state sensitive plants- <i>Cleome multicaulis</i> and <i>Delphinium robustum</i> ; neither type has suitable habitat present at or near the Project site.
			3	Evidence of past disturbances and current indications of stages in ecological succession	Yes	Partially	Add the current indications of stages in ecological succession to the narrative.
			B	Wildlife (terrestrial)			
			1	Determine species present, seasonal occurrence, status and relative importance	Yes	Partially	Add discussion of the relative importance of the species present to the narrative.
			2	Map distribution of species	Yes	N/A	There is no occurrence data or mapping specific to the Project site.
			3	Map biological features (migration routes, breeding grounds, etc.)	Yes	N/A	There are no unique or high-value biological habitat features in the Project impact assessment areas for wildlife. The Biological Resources Review in Attachment 8 includes various maps, but none that show important migration routes or breeding grounds.

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			4	Identify species included on official federal or state list of endangered or threatened species	Yes	Yes	
			5	Identify species that are unique in their Colorado distribution	Yes	Yes	
		C		Wildlife (aquatic)	Yes	N/A	No aquatic resources are present in the Project impact assessment areas.
			1	Identify species present	Yes	N/A	None present within the assessment area.
			2	Map streams, lakes and reservoirs which provide or have potential for habitat	Yes	N/A	None present within the assessment area.
			3	Map biological features (spawning runs, spawning beds, etc.)	Yes	N/A	None present within the assessment area.
			4	Identify any endangered species (federal or state) or any which are unique in their Colorado distribution	Yes	N/A	No federal or state-listed species are expected to be present, or if incidentally present, impacted by the project.
	(c)			At the time of final application, applicants seeking a permit for pipelines or storage areas shall submit, in addition to those requirements set forth in subsection (a) and (b) of this Section, 5 copies of the following documents and information:			
		(i)		Description of hydrologic conditions - surface (impact area)	N/A	Waiver approved	
		A		Provide map of all surface water	N/A	Waiver approved	
		B		Describe expected monthly streamflows for typical year, wet year, dry year (include 7 day-10 year low flows where sufficient data exists)	N/A	Waiver approved	
		C		Describe physical stream features (gradient, velocity, depth, etc.)	N/A	Waiver approved	
		D		Provide data on chemical and biological quality, including BOD, dissolved O2, free CO2, PH, TDS, ph-th alkalinity, MO alkalinity, NH4, heavy metals and other toxic or deleterious substances	N/A	Waiver approved	

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar						
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility						
Code Reference		STEP : Final Application		Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
	(ii)	Description of hydrologic conditions - subsurface (impact area)				
		A	Map all aquifers that may be affected by project	N/A	Waiver approved	
		B	Provide tables, graphs, map showing permeability, transmissibility, thickness, volume, depth of aquifers	N/A	Waiver approved	
		C	Describe geology of strata overlying aquifers including percolation rates, travel time to groundwater surface	N/A	Waiver approved	
		D	Map of all wells using aquifers including diameter, flow rates	N/A	Waiver approved	
	(d)	At the time of final application, applicants seeking a permit for the site selection and construction of a power plant shall submit, in addition to those requirements set forth in subsections (a), (b), and c of this Section, 5 copies of the following documents and information:				
	(i)		Map locating and describing resource areas to be utilized as sources of energy	N/A	Waiver approved	
	(ii)	Description of water system proposed:				
		A	Source of supply, volume and rate of flow at full development	Yes	Yes	Wells are present on parcel no. 5009163000040.
		B	Water rights owned or utilized	Yes	Yes	RGWCD and/or Lee A. Welch owns the water rights and permits associated with the Project.
		C	Proposed points of diversion and changes of points of diversion	Yes	N/A	There are no points of diversion proposed from any area streams or reservoirs. Water would be sourced from water wells and piped to the O&M building.
		D	Volume of stream flow to remain unused between points of diversion	Yes	N/A	

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar						
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility						
Code Reference			STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
		E	Dependability of supply (physical and legal)	Yes	Yes	The dependability of the water rights supply is expected to be reliable based on the minimal use of water required for the Project.
		F	Effects on downstream users	Yes	Yes	Area agricultural water users should benefit from the reduction in water used and placed into the CRP
		(iii)	Description of air pollution control measures	Yes	Yes	Measures will be detailed in the Project Stormwater Management Plan (SWMP) and are required 14 days prior to construction.
	(e)		At the time of final application, all applicants shall submit an analysis of impacts as follows:			
		(i)	Summarize the major natural and socio-economic environmental constraints as they affect the site selection and construction of the facility as proposed	Yes	Yes	
		(ii)	Describe present utilization of land, water, air, biotic, geologic and socio-economic resources within impact area as applicable to submission requirements	Yes	Partially	Add a description to the narrative of current utilization of air and socio-economic resources in the impact area.
		(iii)	Describe alternative uses for these resources	Yes	Yes	Utility-scale solar is the alternative use for the resources.
		(iv)	Analyze effects of proposed site selection and construction upon the natural and socio-economic environment of the impact area as applicable to submission requirements.			
		A	Provide analysis of hydrologic, atmospheric, geologic, pedologic, biotic, visual and noise impacts	Yes	Yes	Alamosa County waived requirements for hydrologic, atmospheric, geologic, and pedologic studies.
		B	Provide surface and subsurface drainage analysis	Yes	Yes	Drainage area map present in Figure 6 in Attachment 11: Hydrology Study.
		C	Provide socio-economic impact analysis	Yes	Yes	Add a summary of the socio-economic impact analysis to the narrative.
		D	Provide transportation impact analysis	Yes	Yes	

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			E	Provide analysis of impacts upon agricultural productivity and ag resources	Yes	Yes	Only 160 acres (less than one percent) of the Project area is currently used for agriculture.
		(v)		Analyze long-term effects of the proposed site selection and construction upon the physical and socio-economic development of the impact area	Yes	Yes	
		(vi)		Justify the proposed site selection and construction against the present and alternative uses of the resources in the impact area	Yes	Yes	Nearly 90 percent of the proposed site is currently non-productive agricultural land.
		(vii)		Describe a program to minimize and mitigate adverse impacts and to maximize the positive impacts of the proposed site selection and construction.			
			A	Analyze alternatives			
			1	Alternative locations and routes	Yes	Yes	No alternative facility locations were considered by Adapture once the Project site was leased.
			2	Alternative types of facilities	Yes	N/A	Attributes of solar facilities are listed.
			3	Use of existing rights-of-way	Yes	Yes	Utilizes existing road network and associated rights-of-way. Please update the narrative for the section that the gen-tie easement is discussed.
			4	Joint use of rights of way with other utilities	Yes	Yes	No new roads are proposed; Project utilizes existing ROW
			5	Upgrading of existing facilities	Yes	N/A	The Project will interconnect to the existing San Luis Valley Substation. Facility upgrades are not known at this time.
			B	Analyze non-structural alternatives as applicable	Yes	Yes	Non-structural alternatives include conservation of energy use and no new development; Neither would address the rapid expansion of energy consumption in Colorado.

Adapture Haynach Solar Hybrid Project
 1041 Final Application Review

9/23/2025

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar							
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility							
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments
			1	Conservation of energy use	Yes	Yes	Energy conservation is not a viable alternative to new energy development in Colorado.
			2	No development	Yes	Yes	No development would not meet the Project's purpose and need.
			C	Analyze management alternatives (i.e. development scheduling, training programs, facility design, land trades, etc.)	Yes	Yes	The location of the Project is dependent on the ability of the existing transmission infrastructure to accept additional generation into the grid at the San Luis Valley Substation. Consequently, there are no management alternative locations to the proposed Project location.
			D	Analyze air and water pollution control alternatives	Yes	Partially	Alternative measures to those typically approved by CDPHE are not considered. Please elaborate on the possibilities available for air and pollution control.
			E	Analyze design alternatives (access, landscaping, architectural controls)	Yes	Partially	Please discuss design alternatives to the ones that are being implemented by the Project.
			F	Submit a program to meet "front end" costs of providing necessary services and facilities	Yes	Yes	
				Other Requirements or Permits Prior to Construction			
			1	National Pollutant Discharge Elimination System (NPDES) Permit for storm water management from the CO. Dept. of Health and Environment	Yes	Yes	Stormwater Management Plan (SWMP) will comply with the General Construction Permit. Required 14 days prior to commencing construction.
			2	Alamosa County Culvert and Access Permit	No	N/S	Alamosa County access permits will be required as conditions of any approval.
			3	Alamosa County Building Permit	No	N/A	

Adapture Haynach Solar Hybrid Project
 1041 Final Application Review

9/23/2025

Table 3. Permitting Process and Requirements for a Solar PV Project- Haynach Solar								
HB1041 Regulations Chapter 6: Regulations for Site Selection and Construction of Major Facilities of a Public Utility								
Code Reference				STEP : Final Application	Present in application?	Sufficient?	Suggested Action/ Notes/ Comments	
				4	Alamosa County ROW License for Transmission Lines	Yes	Yes	A gen-tie ROW will be 25-75 feet wide and is proposed to extend south of the Project Substation to the Tri-state and PSCo Substation. It does not cross any county road or ROW, so will not need a county ROW permit.