

## M E M O R A N D U M

**To:** Richard Hubler, Alamosa County Director of Land Use and Building  
**From:** Logan Simpson Inc.  
**Date:** December 2, 2025  
**Project Name:** RDC CO Stanley Road Community Solar Energy Facility  
**Subject:** Final Application Response Review

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We have reviewed the final application responses of the Stanley Road Community Solar Energy Facility submitted by Reactivate CO Development, LLC for compliance with the Alamosa County 1041 Guidelines and Regulations.

Logan Simpson originally performed a review of the final application submittal on June 10, 2025. Alamosa County's 1041 Regulations Section 6.303, Submission Requirements, identified where the final application omits materials to fully satisfy the County's 1041 Regulations. The findings are summarized below, along with the response received from the Applicant. A summary table of the County Comments, the Applicant's response, and Logan Simpson's evaluation of the response is presented in Table 1. Applicant responses that could not be confirmed as written are highlighted in orange for the County's evaluation.

### 6.303 SUBMISSION REQUIREMENTS FOR A FINAL APPLICATION

This section notes items that were deemed to be incomplete in the final application, and the Applicant's responses or additional submissions to support the request.

**TABLE 1. RDC CO Stanley Rd LLC Community Solar Energy Facility- Final Application Response Summary Table**

County Comment		Applicant Response	Logan Simpson Comments	
General	1	Correct legal description – Addressed in Attachment A, although the included title commitment is dated April 18, 2024 and should either be replaced by the current title policy or an Ownership & Encumbrance Report issued within the past 6 months.	To be added by Applicant upon updated title receipt.	Awaiting updated title receipt from Applicant
General	2	Irrigation canal easements and coordination documentation – I see a “100.00 feet ditch setback” to the Central Lateral Ditch on the site plan in Exhibit C, but did not find any documentation of actual easements or coordination with the ditch company.	Canal company coordination added to Table 3.	Applicant response acceptable.- Site plan shows no effect to the ditch infrastructure, and applicant is employing a setback to avoid crossing. SLV Irrigation District consulted on 10/7/25.
General	3	CDOT access/impact documentation – Attachment N includes a traffic study, but I see no documentation included of discussions or coordination with CDOT.	CDOT coordination added to Table 3.	Applicant correspondence with CDOT on 10/7/25 added to Table 3; awaiting haul route acceptance and traffic study feedback
General	4	Waiver request – This has not yet been submitted and is recommended by county staff and our third-party review agency.	Submitted and Waiver Hearing Completed.	Applicant response acceptable- waiver request and approvals by the County on 9/24/25 are attached in application package.
Local/Regional Impacts	5	Code requirement 2.a.ii: Please add discussion of the anticipated impact of the Project on the region during construction and operation.	Summary added to Section 9.0 and Glint and Glare Study was completed and added to Section 9.7 and Attachment F.	Applicant response acceptable.
Local/Regional Impacts	6	Code requirement 2.a.iii.A: Please add discussion describing the relationship of the 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.	Information added to Section 9.11.	Applicant response acceptable- SLV Hazard Mitigation Plan, County Comprehensive Plan, and Energy Overlay discussion added to narrative in Section 9.11.
Local/Regional Impacts	7	Code requirement 2.a.iii.B: Please add discussion describing 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.	Information added to Section 9.11.	Applicant response acceptable- utility scale solar projects summarized; Special Districts addressed in Section 9.9.

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		<b>County Comment</b>	<b>Applicant Response</b>	<b>Logan Simpson Comments</b>
Local/Regional Impacts	8	Code requirement 2.a.iv.C: Please address Alamosa County energy patterns and needs in Section 7.1.1. Nationwide statistics are cited; however, the local energy insecurity rate is not discussed.	Discussion added [to Section 7.1.1].	Applicant response acceptable- Section 7.1.1 <i>"Alamosa County continues to experience both energy insecurity concerns and energy reliability issues...Community scale-solar project such as the RDC CO County Rd 116 Project can benefit a wide range of residential customers, including income-qualified."</i>
Associated Costs	9	Code requirement 2.a.v.B.1: Please address any anticipated police support for the Project. Also include expected cost of fire department support. If no fire or police services are anticipated, please state so in the narrative.	Information added to Section 9.8.	Applicant response acceptable- <i>"The project is not anticipated to impact the resources, capacity or staffing levels of the Sheriff's Office"</i> .
Associated Costs	10	Code requirement 2.a.vi.A: Please add Section 7.1.3 to the narrative, as described in the Table on page 8 for discussion of capital investment and Project costs. This appears to be an omission in the application.	Added to Section 7.1.3: The total capital cost of RDC CO Stanley Rd is calculated at \$5,197,500 (materials and land), \$3,465,000 (labor) for a sum of \$8,662,500.	Applicant response acceptable- Section 7.1.3 "Capital Investment and Project Costs" added to narrative.
Associated Costs	11	Code requirement 2.a.vi.B: Please add discussion of the impact (if any) to special districts. If no impacts are anticipated, please state so in the narrative.	Information added to Section 9.9.	Applicant response acceptable- Special Districts addressed in Section 9.9; no impacts to any districts or resources are anticipated.
Associated Costs	12	Code requirement 2.e.vii.F: Please add Section 7.1.3 to the narrative as described in the Table on page 8 for discussion of capital investment and Project costs. This appears to be an omission in the application.	Added to Section 7.1.3: The total capital cost of RDC CO Stanley Rd is calculated at \$5,197,500 (materials and land), \$3,465,000 (labor) for a sum of \$8,662,500.	Applicant response acceptable- Section 7.1.3 "Capital Investment and Project Costs" added to narrative.
Visual and Noise	13	Code requirement 2.a.vii.A: Consider adding Key Observation Points at each of the five nearby residences in the vicinity of the Project to analyze their views of the Project.	KOPs from private residences were not added to the analysis, as no landowner requested that such a KOP be added.	Applicant response acceptable- KOPs were taken from major roads in the Project area and applicant did not receive landowner concern to necessitate further viewshed analysis

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Visual and Noise	14	Code requirement 2.a.viii.A: Please add mapping of the expected noise levels throughout the Project site. There is no Figure 4 present, as referenced in Attachment P: Noise Study. This appears to be an omission in the application.	Figure references in Noise Study updated so text and figures now correspond with one another.	Applicant response could not be confirmed- the original noise study from March 2025 is attached and updates are not present in current submission package.
Socioeconomic Impact	15	Code requirement 2.a.ix.A.1: Recommend providing an economic impact assessment using the most current Alamosa County information. Please address average family size and social backgrounds.	Discussion of Project economic impact has been added to Section 7.1.1.	Applicant response acceptable- economic impact discussion was added. That said, information regarding Alamosa County average family size or social backgrounds was not added. This is not considered paramount to permit approval.
Socioeconomic Impact	16	Code requirement 2.a.ix.A.2: Please add discussion of neighborhoods and socio-economic groups.	Discussion of socioeconomic groups added to Section 7.2.1.	Applicant response acceptable- no change to the application regarding discussion of neighborhoods, but this is not considered paramount to permit approval.
Socioeconomic Impact	17	Code requirement 2.a.ix.A.3: The Net Migration Map on page 21 ends at Year 2022 and should be updated to 2024 if data is available.	The Net Migration Map's most recent data is from 2022, so this map will remain.	Applicant response acceptable- no change to application.
Socioeconomic Impact	18	Code requirement 2.a.ix.B.2: Please address under-employment.	Waiver Granted	N/A
Socioeconomic Impact	19	Code requirement 2.a.ix.B.3: Recommend adding a summary of the local labor pool to Section 7.2, Socioeconomic Review.	Summary of local labor pool added to Section 7.2.1.	Applicant response acceptable- Figure 3 in Section 7.2.2 shows jobs by sector in Alamosa County.
Socioeconomic Impact	20	Code requirement 2.a.ix.C.4: Please add a tax base discussion to Section 7.1.2, Statewide and Local Economic Impacts.	Brief tax discussion added to Section 7.1.2.	Applicant response acceptable - "The project area is located within Tax District 221... the project is estimated to generate a total of 15 jobs during its construction and installation period, with an added value to the local economy of about \$1,382,000."
Socioeconomic Impact	21	Code requirement 2.a.ix.C.5: Please add current levels of taxation to Section 7.1.2, Statewide and Local Economic Impacts.	Brief tax discussion added to Section 7.1.2.	Applicant response acceptable. Renewable energy projects, like other utility-scale energy generating facilities in Colorado, are assessed property taxes by a state formula based on energy production value in Colorado. As a result, Alamosa County, school district, fire district, and other governmental

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				authorities in which the projects are located will receive increased annual revenue from the proposal.
Socioeconomic Impact	22	Code requirement 2.a.ix.D.1: Please add current housing inventory to Section 7.0, Financial and Socioeconomic Review.	Current housing inventory and vacancy rate data for Alamosa County has been added to Section 7.2.1.	Applicant response acceptable- <i>"According to the Colorado State Demography Office, Alamosa County has approximately 7,280 housing units. Of these 7,280 units, approximately 6,522 are occupied, and 758 are vacant, resulting in a vacancy rate of 10.41% Individuals not located in nearby communities will relocate to the Alamosa area temporarily. No permanent housing will be required."</i>
Traffic and Haul Routes	23	Code requirement 2.a.ix.E.2: Recommend adding commuting patterns to Section 9.2, Roads or Attachment N, Conceptual Transportation Plan and Haul Routes.	Added to Attachment N.	Applicant response could not be confirmed- the original traffic study from April 2025 is attached and updates are not present in current submission package.
Traffic and Haul Routes	24	Code requirement 2.a.ix.E.3: Recommend addressing arterial streets within the impact area in Section 9.2, Roads or Attachment N, Conceptual Transportation Plan and Haul Routes.	Added to Attachment N.	Applicant response could not be confirmed- the original traffic study from April 2025 is attached and updates are not present in current submission package.
Atmospheric Conditions	25	Code requirement 2.a.x.A.1: Please add wind direction to Section 6.3, Atmospheric Conditions	Waiver Granted.	N/A
Atmospheric Conditions	26	Code requirement 2.a.x.A.2: Please add inversion height to Section 6.3, Atmospheric Conditions.	Waiver Granted.	N/A
Atmospheric Conditions	27	Code requirement 2.a.x.A.3: Please add atmospheric stability to Section 6.3, Atmospheric Conditions	Waiver Granted.	N/A
Atmospheric Conditions	28	Code requirement 2.a.x.B.1: Please add a general topographical description in the narrative to accompany the map in Attachment E, Maps.	Waiver Granted.	N/A
Atmospheric Conditions	29	Code requirement 2.a.x.C: Please add the acceptable range for each air quality parameter (TSP, SO <sub>2</sub> , etc.) and Alamosa County's current values of these pollutants to Section 6.3, Atmospheric Conditions.	Waiver Granted.	N/A

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Pedologic and Biotic Conditions	30	Code requirement 2.b.i.E: Please add a discussion of energy resources to Section 12.1, Mineral and Energy Resources.	Information added to Section 12.1.	Applicant response acceptable- update added to Section 12.1. <i>"There are no known extractable minerals underlying the project site and no other known sources of energy generation within the project area. The project area receives ample sunshine (over 350 days per year according to Alamosa County 2025)."</i>
Pedologic and Biotic Conditions	31	Code requirement 2.b.ii.A.1: Please add a discussion of characteristics, quantity, and productivity of plant type to Section 6.5, Project Site Study and Analysis Overview. If the Project area is not currently used for agriculture, please address the landcover that is present.	Discussion of landcover added to Section 6.5.	Applicant response acceptable - <i>"The study area is comprised primarily of disturbed desert scrub habitat, and there are no current or historic agricultural activities within the study area."</i>
Pedologic and Biotic Conditions	32	Code requirement 2.b.ii.A.2: Please add a discussion of the presence or absence of endangered or threatened plants to Section 6.5, Project Site Study and Analysis Overview.	Discussion of lack of endangered and threatened plants onsite added to Section 6.5.	Applicant response acceptable - <i>"No endangered or threatened vegetative species were observed within the study area."</i>
Pedologic and Biotic Conditions	33	Code requirement 2.b.ii.A.3: Please add a discussion of past disturbances and indications of stages in ecological succession to Section 6.5, Project Site Study and Analysis Overview.	Discussion of ecological succession and disturbances added to Section 6.5.	Applicant response acceptable - <i>"With the majority of vegetation within the study area being shrubs of short to medium height, the study area appears to be comprised primarily of pioneer species with regard to phases of ecological succession. No previous disturbances to the study area were identified during site reconnaissance."</i>
Pedologic and Biotic Conditions	34	Code requirement 2.b.ii.B.3: Please add a map of biological features in Attachment E, Maps.	Attachment E updated to include field observed biological features map.	Applicant response acceptable - Field Reconnaissance Biological Resources Map added to Attachment E.
Pedologic and Biotic Conditions	35	Code requirement 2.b.ii.B.5: Please add a discussion of the presence or absence of species that are unique in their Colorado distribution to Section 6.5, Project Site Study and Analysis Overview. Although a Colorado's Conservation Data Explorer (CODEX) report is listed as an acronym, there is no citation in the narrative for this reference. Consider generating a CODEX report for the Project area and a 1.0-mile buffer to inform species likely to occur within and near the Project area.	CODEX report has been generated and included as Appendix J of Attachment I. Discussion of CPW High Priority Habitats and protected waters added to section 6.5.	Applicant response acceptable- CODEX map of ferruginous hawk High Priority Habitat is present in Attachment I and discussion of HPH was added to Section 6.5 under the "Biological Resources" section. The Applicant and site plan commits to avoid construction and operations within High Priority Habitat.

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Construction Impacts	36	Code requirement 2.e.iv.A: Please add an analysis (if any) of geologic and pedologic impacts. If none, please state so in the narrative.	Information added to Section 9.7.	Applicant response acceptable- <i>"The Project will not substantively diminish the environmental character of this region of Alamosa County. No impacts to geologic resources are anticipated to occur and construction impacts to soils and vegetation will be mitigated by design and grading approach, dust suppression, weed management, and revegetation and vegetation maintenance measures."</i>
Construction Impacts	37	Code requirement 2.e.iv.D: Please add a discussion of current traffic patterns for the Project area.	A discussion of the existing traffic patterns is now included in the Traffic Letter in Appendix N.	Applicant response could not be confirmed- the original traffic study from April 2025 is attached and updates are not present in current submission package. That said, attachment N includes construction traffic generation estimates of 30 total vehicles per day (with the highest traffic rates occurring for approximately 3 to 4 months) on State Highway 17.
Utilization and Alternatives	38	Code requirement 2.e.i: Please address the natural and socioeconomic environmental constraints in Section 7.2, Socioeconomic Review and 9.0 Project Impacts and Mitigation	Information added in both Sections [Section 7.2 and Section 9.0].	Applicant response acceptable- environmental constraints are discussed throughout Attachment I: Biotic and Aquatic Conditions Report. Energy insecurity, affordability, and work force development are discussed as constraints in Section 7.0
Utilization and Alternatives	39	Code requirement 2.e.ii: Please add a description of current utilization of resources to Section 6.0, Site Description or Section 9.0, Project Impacts and Mitigation	Information added in both Sections [Section 6.0 and Section 9.0].	Applicant response acceptable- additional resource information was added to Section 6.0, "Site Description", and to Section 9.9, "Special Districts" and Section 9.11, "Land Use Planning".

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Utilization and Alternatives	40	Code requirement 2.e.iii: Please add a description of alternative uses of resources to Section 6.0, Site Description or Section 10.0, Alternatives Analysis	Information added to Section 10.1 and Section 12.1.
Utilization and Alternatives	41	Code requirement 2.e.vii.A.1: Please discuss alternative sites or routes that were considered for the Project.	Applicant Response acceptable- Section 10.1 states <i>"Other beneficial uses of the project area, including subdivision or additional residential development, do not appear preferable or reasonable, nor would they have a commiserate level of economic benefit to the community, according to zoning and land use maps (Alamosa County 2025)."</i> Section 12.1 states <i>"The RDC CO Stanley Rd Project takes advantage of the known energy source within the project area, solar, and is not anticipated to conflict with other mineral and energy resources in the project area."</i>
Utilization and Alternatives	42	Code requirement 2.e.vii.A.2: Please discuss alternative facilities that were considered for the Project.	[Information] added to [Section] 10.2.
Utilization and Alternatives	43	Code requirement 2.e.vii.A.3: Please discuss alternative ROWs that were considered for the Project (if any). If none, state so in the narrative.	[Information] added to [Section] 10.2.

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Utilization and Alternatives	44	Code requirement 2.e.vii.C: Please add an analysis of management alternatives for development scheduling, training programs, facility design, land trades, etc.	[Information] discussed in Section 10.3.	Applicant response acceptable- alternatives to site plans to avoid a raptor nest, coordination with Public Works Dept, minimizing traffic disruption to the area, and training for workers and emergency service providers are discussed in Section 10.1 and Section 10.3.
Utilization and Alternatives	45	Code requirement 2.e.vii.D: Please add an analysis of air and water pollution control alternatives to Section 5.2, Project Support Facilities.	[Information] added to [Section] 5.2.	Applicant response acceptable- Section 5.2 <i>"The active use of the site as a solar energy facility does not introduce any additional nonpoint source pollution potential. As a result, no alternatives to pollution prevention are associated with the project."</i>
Utilization and Alternatives	46	Code requirement 2.e.vii.E: Please add an analysis of design alternatives (access, landscaping, architectural controls) to Section 10.0, Alternatives.	Discussion added [to Section 10.0].	Applicant response acceptable- Section 10.1 "Alternatives Analysis" thoroughly discusses the considerations for the Project design in order to minimize overall impact to the area.