

## 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 8, 2025  
**Project Name:** RDC CO RD 116 Community Solar Energy Facility  
**Subject:** Final Application Response Review

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We have reviewed the final application responses of the RDC CO RD 116 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 July 11, 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 County Rd 116 LLC Community Solar Energy Facility- Final Application Response Summary Table**

Comment		Applicant Response	Logan Simpson Comments	
General	1	CDOT access/impact documentation – Attachment N includes a traffic study and Attachment O a road condition survey, but I see no documentation included of discussions or coordination with CDOT yet.	CDOT coordination added to Table 3.	Applicant response acceptable- correspondence with CDOT on 10/7/25 added to Table 3. Applicant is currently waiting haul route acceptance and traffic study feedback
General	2	Waiver request – This has not yet been submitted and is recommended by County staff and our third-party review agency, unless you plan to address the identified items in an updated final submittal	Submitted and Waiver Hearing Completed on 09/24/2025.	Applicant response acceptable- waiver request and approvals by the County on 9/24/25 are attached in application package.
Local/Regional Impacts	3	Code requirement 2.a.ii: Please add discussion of the anticipated impact of the Project on the region during construction and operation.	Summary added under Section 9.0.	Applicant response partially acceptable- Section 9.0 <i>"RDC CO County Rd 116 will have short-term localized adverse impacts to traffic and noise, lasting for the duration of construction. The Project is not anticipated to result in long-term adverse impacts to natural or socioeconomic resources within the Project or region."</i>  "Impact Area" has not been added to the Maps submitted in Attachment E, as referenced in Page 21 of the narrative.
Local/Regional Impacts	4	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 discussed in Section 9.11.
Local/Regional Impacts	5	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 in Section 9.11; Special Districts are addressed in Section 9.9.

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Local/Regional Impacts	6 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 in 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	7 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 in Section 9.8: " <i>No additional training or equipment is expected to be needed by the Fire Department to accommodate the project. The project is not anticipated to impact the resources, capacity or staffing levels of the Fire Department...The project is not anticipated to impact the resources, capacity or staffing levels of the Sheriff's Office.</i> "
Associated Costs	8 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 County Rd 116 is calculated at \$4,095,000 (materials and land), and \$2,730,000 (labor) for a sum of \$6,825,000.	Applicant response acceptable in Section 7.1.3: "Capital Investment and Project Costs" added to narrative.
Associated Costs	9 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	10 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 County Rd 116 is calculated at \$4,095,000 (materials and land), and \$2,730,000 (labor) for a sum of \$6,825,000.	Applicant response acceptable in Section 7.1.3: "Capital Investment and Project Costs" added to narrative.

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Visual and Noise	11	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.
Visual and Noise	12	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 the Noise Study updated so text and figures now correspond with one another.	Applicant response acceptable- Attachment P: Noise Study now includes Figure 4: Operational Sound Contours as page 9 of the attachment.
Socioeconomic Impact	13	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	14	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	15	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- no change to application.
Socioeconomic Impact	16	Code requirement 2.a.ix.B.2: Please address under-employment. Waiver Granted	N/A
Socioeconomic Impact	17	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	18	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- <i>"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 \$1,089,000."</i>

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Socioeconomic Impact	19 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 authorities in which the projects are located will receive increased annual revenue from the proposal.
Socioeconomic Impact	20 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	21 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 acceptable- The traffic study letter present in Attachment N was updated on July 18, 2025 and includes discussion of current traffic patterns near the Project site.
Traffic and Haul Routes	22 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 acceptable- The traffic study letter present in Attachment N was updated on July 18, 2025 and includes discussion of arterial roadways.
Atmospheric Conditions	23 Code requirement 2.a.x.A.1: Please add wind direction to Section 6.3, Atmospheric Conditions	Waiver Granted	N/A
Atmospheric Conditions	24 Code requirement 2.a.x.A.2: Please add inversion height to Section 6.3, Atmospheric Conditions.	Waiver Granted	N/A
Atmospheric Conditions	25 Code requirement 2.a.x.A.3: Please add atmospheric stability to Section 6.3, Atmospheric Conditions	Waiver Granted	N/A

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Atmospheric Conditions	26	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	27	Code requirement 2.a.x.C: Please add the acceptable range for each air quality parameter (TSP, SO2, etc.) and Alamosa County's current values of these pollutants to Section 6.3, Atmospheric Conditions. Waiver Granted	N/A
Pedologic and Biotic Conditions	28	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	29	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	30	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 on site added to Section 6.5.	Applicant response acceptable- Applicant described form of survey and absence of T&E species.
Pedologic and Biotic Conditions	31	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>

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Pedologic and Biotic Conditions	32	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	33	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 High Priority Habitat is present in Attachment I and discussion of HPH was added to Section 6.5 under the "Biological Resources" Section.
Construction Impacts	34	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 Applicant is confident that the proposed 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	35	Code requirement 2.e.iv.D: Please add a discussion of current traffic patterns for the Project area.	A discussion has been added to the Traffic Letter in Appendix N.	Applicant response acceptable- The traffic study letter present in Attachment N was updated on July 18, 2025 and includes discussion of current traffic patterns near the Project site. Construction traffic generation estimates 30 total vehicles per day (with the highest traffic rates occurring for approximately 3 to 4 months) on County Road 116.
Utilization and Alternatives	36	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 to 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.

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Utilization and Alternatives	37 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 to both Sections [Section 6.0 and Section 9.0].	Applicant response acceptable- additional resource information was added to Section 6.0 "Site Description", Section 9.9 "Special Districts", and Section 9.11 "Land Use Planning".
Utilization and Alternatives	38 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.	Applicant response acceptable in Section 10.1: " <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: " <i>The RDC CO County Rd 116 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	39 Code requirement 2.e.vii.A.1: Please discuss alternative sites or routes that were considered for the Project.	[Information] added to [Section] 10.2.	Applicant response acceptable: " <i>The proposed development of this facility will result in the production of community-scale solar energy for Alamosa County residents. It will utilize currently undeveloped parcels that are not actively used for agricultural production or appear viable for other development uses. Site selection and haul route selection were determined following evaluation of numerous other respective alternatives...the Applicant approached several landowners in the general vicinity of the project area to gage potential interest for leasing currently vacant and unused land for use in solar production and submitted several potential locations with associated Rights of Way location to Xcel for evaluation of interconnect potential. The site, interconnect location and haul route ultimately selected minimize impacts to the greatest extent possible in the region and reflect a viable project for interconnect.</i> "
Utilization and Alternatives	40 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	41 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	42 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	43 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 in 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	44 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 in Section 10.1: "Alternatives Analysis" thoroughly discusses the considerations for the Project design in order to minimize overall impact to the area.
Minor Inconsistencies	45 The title of Attachments as listed on Page 3 (or in the body) of the narrative does not exactly match the title of the document in the actual attachment. For example, Attachment Q is titled "Emergency Response Plan" but on Page 3 of the Narrative Attachment Q is labeled as "Hazard and Emergency Procedures Report".	Titles of attachments have been updated to match those listed in the narrative.	Applicant response acceptable- the titles of Attachments were confirmed to match the Attachment List in the body of the narrative.
Minor Inconsistencies	46 The Narrative has Section 7.2.1 "Alamosa County Socioeconomic Environment" and Section 7.2.3 "Migration Trends" but is missing Section 7.2.2. Either Section 7.2.2 was accidentally omitted or the numbering needs to be updated.	Previous Section 7.2.3 has been renumbered to 7.2.2.	Applicant response acceptable.

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Minor Inconsistencies	47 The narrative states on page 16 that "Vegetation consisted of species commonly observed in the Arid West and was dominated (over 20% ground cover) by greasewood ( <i>Sarcobatus vermiculatus</i> ) and rubber rabbitbrush ( <i>Ericameria nauseosa</i> )." However, the Biotic and Aquatic Conditions Report does not list rubber rabbitbrush in the vegetation Section on page I9 of the report.	After review of site reconnaissance data, references of rubber rabbitbrush have been removed from the narrative.	Applicant response acceptable- Section 6.5 currently states " <i>Vegetation consisted of species commonly observed in the Arid West and was dominated (over 20% ground cover) by greasewood (Sarcobatus vermiculatus).</i> "
Minor Inconsistencies	48 There is no List of References or Works Cited in the application. The best available data sources should be cited and referenced.	Added [a list of References to Section 13.0].	Applicant response acceptable- Section 13.0 "References" has been added to the application narrative.