



**MEMORANDUM**

**TO:** Cochise County Planning and Zoning Commission  
**FROM:** Christine McLachlan, AICP, Planning Division Manager  
**FOR:** Daniel Coxworth AICP, Development Services Director  
**SUBJECT:** SU 23-17 (Three Sisters Solar) Application for a Special Use Authorization  
**DATE:** July 31, 2023, 2023, for the August 9, 2023, Meeting

**DRT AND AGENCY COMMENTS DOCKET SU 23-17**

On June 30, 2023, the Development Review Team for the County and relevant external agencies was transmitted case information for their review. Reviewers were given until July 21, 2023, to respond. At that time, they were notified that a failure to respond by that date would result in an automatic approval by their agency/Department. The following is a summation of all the comments that were received by that date.

**Cochise County, Floodplain:**

1. A review Checklist was uploaded into the Citizen Serve account (Documents section) on July 31, 2023, for the applicant's convenience. This is a list of departments and outside agencies that may possibly require additional permits, reports, etc.
2. A Drainage Analysis is required to prove that there will be no adverse impacts to the properties, property boundaries, adjacent properties, and roadways.
3. The Cochise County Floodplain Regulations shall be used as a primary reference for drainage calculations and drainage construction requirements. The current version is December 2015, however a revised edition expected to be released towards the end of summer 2023, Date to be determined.
4. A Floodplain Use Permit will be required. Requirements to be determined at a later date.

**Cochise County ROW:** Maintenance ends at the E Kimzey Rd and the start of S Anderson. Easement exists on the east side of 205-28-001 for access. Will discuss with Engineering Management and Director.

**Cochise County Building:** No comments received.

**Cochise County Attorney's Office:** No comments received.

**City of Willcox:** The City of Willcox has received your transmittal on the Three Sisters Solar Project, SU23-17. We appreciate the opportunity to comment on projects around the Willcox area. At this time, we have no comments on this project.

**Cochise County Sheriff's Office:** No comments received.

**Sulfur Springs Valley Electric Cooperative:** The proposed Gen-Tie line will have a utility crossing with SSVEC near the interconnection substation. Please have the applicant coordinate with SSVEC coordinate design requirements for this crossing.

**Arizona Game and Fish:** Included within the complete application (Appendix 3)

**Emergency Management:** Included within the complete application, note 3, page 11 states: The Applicant has contacted the County Emergency Management Director and will prepare an Emergency Response Plan including emergency contacts, hazard analysis and instructions for various emergency situations. The Applicant is also coordinating with the fire departments (Sunsites, Pearce, and Willcox) as they would be among the likely first responders.

**National Resources Defense Council:** No comments received.

**Arizona Department of Environmental Quality:** No comments received.

**State Lands Department:** No comments received. No state lands were a part of this application.

**Arizona Department of Water Resources:** No comments received.

**El Paso Natural Gas:** (Email response 6/30/23). There are no Kinder Morgan pipelines (EPNG & SFPP) on the development properties themselves, so there are no conflicts expected with the solar facilities on the parcels listed in the transmittal letter. However, the plans call for a new 230kV transmission line to run parallel to and within 300' of the EPNG and SFPP pipelines for a distance of approximately 1,300'. This scenario can cause interference with the electrically charged cathodic protection systems on these pipelines, so EPNG and SFPP will require Developer to fund an AC Interference study to analyze the potential impacts of the proposal and pay for the installation of any mitigations and monitoring facilities the study recommends. The new transmission line must cross the pipelines either way, but the alternative shown below may reduce the impact by removing the parallel portion of the route.

(Email response 7/19/23): Please find attached Kinder Morgan's Overhead Power Line Requirements for Third Parties for sharing with all interested parties. To save time, we recommend that the Project commission the AC Interference & Mitigation studies directly – one for the EPNG lines and one for the SFPP lines. The two companies we recommend using are Corrpro or Ark Engineering. If the study recommends AC mitigation, then: EPNG/SFPP would prepare an estimate for the costs to install the mitigations; I will prepare a Reimbursement Agreement for the mitigation expenses; Project will be required to prepay to EPNG and/or SFPP the estimated costs for that construction. EPNG/SFPP would set up a project for the installations; EPNG/SFPP would install the improvements; keep an accounting of the actual costs; and when all work is complete, refund any over payment or bill Project for any shortage.

(Applicant response to El Paso, 7/26/23): Thank you again for providing this information. We plan to move forward with the required studies in the coming months and will reach back out to you when those studies are completed. We have every intention to work with Kinder Morgan in developing our project to ensure everything is done safely and in accordance with Kinder Morgan's requirements.