

Rainbow Valley Energy Center

Annexation Request

*A request to annex approximately 711.17 acres of unincorporated
Maricopa County land Into the City of Goodyear, Arizona*

Narrative Report

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Submitted to:

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On behalf of:



EDF Renewables, Inc. North America

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INTRODUCTION

This narrative report provides all pertinent information to initiate the process of annexing approximately 711.17 acres of unincorporated Maricopa County land (the “Annexation Property”) into the City of Goodyear to facilitate development of the Rainbow Valley Energy Center (the “Energy Center”), proposed by Solar developer EDF Renewables inc. (herein “EDFR”) within the City of Goodyear, Arizona.

A formal request for annexation and a Special Use Permit (SUP) Application are being concurrently submitted to the City of Goodyear and will be processed independently. EDF Renewables Inc. respectfully requests that the city prioritize the SUP's approval, stipulating it becomes effective only upon the property's legal annexation. This ensures that the city will only approve the annexation after the Energy Center has finalized the off-taker agreement, confirming the project's progression.

The conditional approval of the SUP is crucial for the Energy Center to finalize the off-taker agreement. If this approach is accepted, the annexation will be processed concurrently with the SUP request, but final adoption will not occur until the off-take agreement is executed, which is anticipated in the coming months.

About the Developer

EDF Renewables Inc. is one of the largest renewable energy providers in North America, boasting over 20 gigawatts of wind, solar, battery storage, and electric vehicle charging projects developed and currently operating throughout the United States, Mexico, and Canada. EDF Renewables, inc. is a long-term owner and operator of renewable energy projects and developments throughout North America and is determined to build a new net-zero fossil energy future with renewable electricity and innovative sustainable energy solutions to deliver the highest value to their customers, communities, and future generations.

With over 35 years of alternative energy development and production experience, EDF Renewables, Inc. provides services to millions of customers through its renewable energy projects and supporting subsidiaries. Employing nearly 1,400 professionals throughout North America, the regional EDF team's passion and deep and diverse experience across the many facets of the renewable energy industry is applied to each new project to ensure the highest quality products, materials, and services, while developing the best-in-class energy facilities, which adhere to the utmost operational safety standards and industry best practices.

EDF Renewables, Inc. is focused on bringing world-class renewable energy production developments and facilities to the southwest and Arizona, with 10 similar renewable energy projects planned or currently under development throughout central and southern Arizona. The Developer earns the trust of all partners and communities they serve by applying their core values and company-wide mission to everything they do. These values include Safety, Partnerships, Good Sense Accountability, Teamwork, Transparency, Respect, and Passion.

Annexation Request

Purpose of Request

Rose Law Group pc (the “Applicant”) submits this request for annexation on behalf of Rainbow Valley Energy Center LLC, a subsidiary of EDF Renewables, Inc. (“EDFR”). The Applicant is requesting to annex approximately 711.17-acres of unincorporated Maricopa County Land (the “Annexation Property”) into the City of Goodyear (See **Table 3**: Annexation Parcel Table) to facilitate development of a proposed solar and battery energy storage project (the “Energy Center” or “Project”).

A Special Use Permit (“SUP”) will be concurrently submitted to the city for consideration along with the formal annexation request. The SUP should be processed and approved prior to the annexation being finalized, with a stipulation indicating it will not take effect until (and unless) annexation is formally approved. Both requests are proposed to be processed, reviewed, and considered concurrently, with formal adoption of the annexation contingent on EDFR executing an off-taker agreement.

SITE CONDITIONS & CONTEXT

General Location

The Annexation Property is primarily situated south of the City of Goodyear, beginning at the southwest corner of Schumacher Lane and 71st avenue and continuing south of the city limits, ending at Fulcar Road to the south. An additional 80-acres (APN: 300-27-034J) of unincorporated land situated to the northwest of much of the Annexation Property area is also requested to be incorporated into the City of Goodyear. This area is bounded by the City of Goodyear limits to both the east and west.

Together the 711.17-acre Annexation Property is primarily bisected by W. Komatke Road (running northwest to southwest through the Project site) and W. Schumacher Ln (running West to East). The entire Annexation Property area is situated north of W. Fulcar Road, west of Pinal County’s westernmost boundary and east of S. 83rd Avenue. (See **Exhibit 1**: Vicinity Map).

Project Context

Regionally, the Annexation Property is located northeast of the South Maricopa Mountains Wilderness, bordering the Palo Verde Mountains to the east and the Mobile Valley basin to the south. The Property itself is in Little Rainbow Valley, just south of the City of Goodyear’s southernmost boundary. (See **Exhibit 2**: Birds Eye Aerial).

Currently, all land under control by EDF Renewables, inc. and a part of the Energy Center Project (including land currently within the City Boundary) totals approximately 2,067.7 acres of vacant land. The proposed Annexation Property area is located approximately 4.5 miles to the southwest of State Route 238, generally south and west of the unincorporated town of Mobile and located approximately 10.5 miles southwest of the City of Maricopa. As previously stated, the entire Annexation Property is within Maricopa County, bordering the Pinal County limits to the east.

Existing Conditions

The entire 2,067.27-acre Energy Center, which includes areas within the city is currently vacant and has never been developed or improved. Nearly all the adjacent and surrounding parcels are also vacant, undeveloped, or underdeveloped, with limited land use activity found existing within the vicinity of the Annexation Property boundaries. Portions of the Annexation Property and Project area in its entirety are within a floodplain, with a .2% Annual Chance Flood Hazard. Effective Floodplain “X” runs through much of the Energy Center Project site, however none of the Annexation Property is within the proposed Gila River Floodplain Study area.

City of Goodyear & Arizona State Land Department (ASLD)

Approximately 1,356.10 acres of the Energy Center Project site are located within the City of Goodyear, zoned Agricultural- Urban (AU) with a mix of Scenic and Traditional Neighborhood or Agricultural- Open Space land use designations. An additional 668.3 acres of the Project area is managed by the Arizona State Land Department and located within the City of Goodyear, currently zoned Planned Area Development (PAD). (See **Exhibit 3: Existing Zoning Map**).

Maricopa County

Approximately 711.17 acres of the Project area (the Annexation Property) are located within unincorporated Maricopa County and zoned Rural-Residential (RU-190). This land has a mix “Unincorporated Maricopa County- Rural” or “Undesignated- Open Space” land use designations and is completely vacant. (See **Exhibit 3: Existing Zoning Map**).

Annexation Property

As described above, the Annexation Property is generally located at the southwestern edge of the City of Goodyear limits and the westernmost edge of Pinal County. **Table 1** below describes all surrounding zoning and land uses, as well as their corresponding jurisdictions. (See **Exhibit 4: Annexation Map & Table 1** surrounding Zoning and Land Use), below:

Table 1: Surrounding Zoning and Land Uses

Location	General Plan Designation	Zoning	Land Use Description
Site	Neighborhood, Scenic Neighborhood, Agriculture, and Open Space	PAD Agricultural- Urban	Vacant, Agricultural
North	Neighborhood	PAD (Goodyear)	Vacant, Agricultural
South	Not within City of Goodyear Planning Area	RU-190 (Maricopa County)	Vacant, Agricultural
East	Pinal County	RU-190 (Maricopa County)	Vacant, Agricultural
West	Neighborhood, Scenic Neighborhood, Agriculture, and Open Space	RU-190 (Maricopa County)	Vacant, Agricultural

RAINBOW VALLEY ENERGY CENTER

The Energy Center Project

The Rainbow Valley Energy Center project (herein the “Energy Center” or “Project”) consists of the development and construction of a solar energy generation and a battery energy storage system (“BESS”) facility on approximately 2,067.27 total acres (herein “Site”). As previously indicated, the 711.17-acre Annexation Property included in this Project proposal will be required to annex into the City of Goodyear and is the specific purpose of this request.

The Project features solar power generation and battery storage through the on-site assembly and placement of photovoltaic (PV) modules producing up to 300 megawatts of power and up to 300 megawatts of battery energy storage system (BESS), with associated support systems. As is described in detail within the “Justification and Economic Benefits” sections of this narrative, the approval of this annexation request is not only necessary for the Projects successful development but is also in the long-term interest of city.

The incorporation of the Annexation Property will net significant economic benefits to the city while facilitating the development of a vital community resource. This annexation will ensure the city retains and manages the growth and development of an area within its future Planning boundaries while capturing revenue from an area that has otherwise remained underutilized. This request also presents an opportunity for the city to not only control the development of the area and appearance of the Energy Center but avoids conflicting development standards from being applied to this portion of the Project area by Maricopa County.

With this in mind, it’s clear that incorporation of the Annexation Property is not only necessary for the city to impose reasonable conditions on the Energy Center Project through the Special Use Permit process but required for EDF Renewables to develop the Energy Center Project in a consistent and orderly manner.

Community Benefits

The incorporation of the Annexation Property, through this request, presents a pivotal opportunity for the city to facilitate the development of a competitive and efficient renewable resource for its community. The inclusion of the Annexation Property will enable the incorporation of necessary renewable energy infrastructure into Goodyear, serving as a central component to meeting the city’s long term energy goals.

By integrating Annexation Property into the Project area currently proposed within the city limits, EDF Renewables can optimize the layout and operational efficiency of the facility, thereby enabling the city to capture not just a portion but all the community and economic benefits of the Project. Furthermore, the incorporation of the Annexation Property into the city will enable the Energy Center Project to be better aligned with city’s Community Goals, including Goodyear’s physical growth and development objectives and future energy needs by *maximizing the availability and use of renewable sources of energy* within the city limits¹.

¹ See Goodyear 2025, Chapter 4 “Community Goals” Physical Growth and Development Goal GD-9.

Utilities and energy providers throughout the nation have made it known that renewable solar energy production and BESS facilities are essential for the strategic advancement and security of the energy supply and electric grid. This has become increasingly clear in our state, as significant growth has demanded substantial development of renewable energy production and energy storage Projects to keep up with demand and meet the capacity requirements of the local electric grids, including the grids managed by the local utilities serving the City of Goodyear and neighboring communities.

The Rainbow Valley Energy Center will be an important component for the continued modernization of the local electric grid and will be optimized to serve the Goodyear community in multiple ways. This includes providing reliable and consistent power year-round through clean solar energy generation and supplying immediate power for ‘peak’ demand events and backup energy to reduce or avoid blackouts using BESS equipment. The Energy Center increases grid resiliency by quickly and efficiently supplying energy in response to intermittent or inconsistent energy supplies from other sources.

Economic Benefits²

In addition to being a necessary component of dependable and renewable power for the local community, the proposed solar energy and BESS Energy Center is anticipated to generate significant local economic development for Goodyear over its lifespan, including millions of dollars in direct and immediate construction spending.

EDF Renewables has engaged Elliot Pollack and Company, the state's preeminent economist, to conduct a comprehensive study of the Project's economic impact and benefits to the City of Goodyear. The findings underscore the positive implications the Project holds for the city and its taxing districts, including schools. Preliminary estimates reveal that over a 35-year span, the Energy Center is projected to generate approximately \$58.8 million in fiscal impacts locally from construction and operations.

Of the tax revenues accrued, a substantial portion will be allocated to school districts, amplifying support for educational initiatives with an estimated \$27.5 million contribution over three decades. During the construction phase, the Project will create hundreds of immediate job opportunities, injecting millions into wages and creating numerous ancillary employment opportunities within the local community. The Energy Center is anticipated to yield an estimated \$3.2 million in use taxes to the City of Goodyear from taxable materials and construction. By annexing the Maricopa County land, the City of Goodyear will collect an additional \$4.1 million in total tax revenue over the life of the project, compared to the Project developing without the annexation.

The Project's eventual development and ongoing operation would result in 5-10 permanent, full-time jobs with over \$20 million in wages over its operational lifespan. Additionally, this Project will increase the city of Goodyear's utility self-sufficiency and energy supply for future residential and related developments that may expand into this area. Ultimately, the Project's operations and success is expected to generate

² See *Rainbow Valley Solar Project Economic & Fiscal Impact Report*.

hundreds of thousands of dollars in tax revenue annually for the city, surrounding communities, and special districts.

Fiscal Impact Summary	
Rainbow Valley Solar Project	
(2024 dollars)	
Construction Impact	
State use tax	\$10,724,000
City of Goodyear use tax	\$3,230,800
Secondary revenues from employment	\$615,900
Operations Impact	
Personal property tax	
City of Goodyear	\$6,002,000
Maricopa County	\$10,260,000
School Districts	\$27,580,000
Secondary revenues from employment	\$451,500
GRAND TOTAL FISCAL IMPACT	\$58,864,200

Source: Elliott D. Pollack & Co.; EDF Renewables; IMPLAN

Moreover, the Project's development and operation promise to furnish the city of Goodyear with a steady stream of tax revenue, benefiting not only the city but also surrounding communities and special districts. Leveraging state lands for the solar project not only enhances productivity but also generates taxable revenue previously untapped. By embracing this Project, the city stands to capture a new revenue stream that aligns seamlessly with the objectives outlined in the City of Goodyear General Plan, facilitating growth and prosperity while minimizing the strain on municipal services.

In summary, the Project represents a transformative opportunity for the City of Goodyear, delivering tangible economic benefits, enhancing energy security, and fostering sustainable growth while minimizing strain on municipal services. This annexation request allows the project to be developed in the most efficient and beneficial way for both EDFR and the City of Goodyear.

Project Compatibility

The proposed Project is not only compatible with the existing uses found in the surrounding area, which consists of vacant or underdeveloped land, but is consistent with the current character of the area. For example, both the SRP and TEP Substations, other utility structures and associated transmission and gas line corridors are all found in the vicinity of the Annexation Property. The existing character and conditions of this area of Goodyear has created a unique opportunity for the continued development of utility services, energy production, Battery Energy Storage, and similar land uses in this area.

Notably, this use is also temporary and will be completely decommissioned at the end of its useful life. That means that in the future, when this area may be better suited for development or have different characteristics, the Project will be ready to be decommissioned and this area can be repurposed for the needs of the day. The Project is the perfect opportunity to derive economic benefit from an interim use of land, while meeting the community growth and development objectives, and energy goals in the immediate.

Water Resources

Solar generation and Battery Energy Storage Systems and their associated operations and systems are incredibly low impact uses. The use of water resources by the Energy Center for its daily operation is almost non-existent, with water only required for routine washing and maintenance purposes on a quarterly bases. As with all developments, water is required for firefighting, dust control and safety purposes. As such, permanent aboveground water storage tanks are proposed for the Site and will only be used for minimal O&M tasks, including services for any facilities, and support for on-site fire-safety requirements. Based on typical requirements of the city, other local fire district and best practices for the land uses and structures proposed, an appropriate water supply capable of supplying the required fire flow for fire protection maintenance needs will be provide on Site.

Despite the size of the Project, it has little to no other water needs, placing no increased pressure on the current regional water supply. Therefore, support of the Project's development is not anticipated to require any additional water resource infrastructure or improvements beyond the placement of any necessary water storage towers.

EDFR aims to secure an ample water supply for both the construction and ongoing operations and maintenance of the Project site, by utilizing a general industrial groundwater permit or purchase water from a local water purveyor, emphasizing sustainable water management practices to meet their already minimal operational needs efficiently. By utilizing an industrial groundwater permit for water production purposes and on-site storage tanks EDF can meet both their construction and operational water needs.

Noise & Traffic

This Project is not expected to produce any noise, traffic, or emissions, therefore the impact on any surrounding land uses or properties is negligible. The only roadway or access necessary for operation of the site is a two-lane roadway to be used exclusively for maintenance and operations employees and off-site deliveries, which occasionally support and service the site.

Fire & Emergency Services

A Fire Prevention Plan will be prepared for the construction, operation, and decommissioning of the facility. The plan will include measures to safeguard human life, prevent personnel injury, preserve property, and minimize downtime in the unlikely event of a fire incident. Fire protection measures will include fire prevention and emergency services during construction. The Developer anticipates working closely with local fire officials and providing the level of protection that those local officials request. This will ensure the project serves the highest benefit to the Goodyear community with the smallest risk level

obtainable. If the City of Goodyear Fire Department is unable or uninterested in serving this Site, EDFR will work with private providers to allow for service that satisfies Goodyear Fire Department Requirements. EDFR is also performing due diligence into possibly incorporating the Site into nearby Fire Districts.

EDFR places paramount importance on the safety of both construction workers and full-time operations & maintenance employees. Recognizing the heightened risks during construction, particularly with heavy equipment and a large workforce, the developer is committed to ensuring site safety by advanced contact with private ambulance and emergency services during the construction and pre-operational phases of the Project. This initiative-taking measure not only enhances safety protocols but also contributes to a swift response at the construction site, minimizing risks and alleviating the burden on Goodyear emergency Services during this phase of the Projects development & operation.

I-11 Corridor

EDFR maintains a steadfast commitment to sustainability and the enduring operational life of the Project. Acknowledging the site's location and adjacency to the future I-11 corridor, the developer is committed to helping ensure the viability of that corridor. To facilitate this, EDFR pledges to refrain from constructing permanent structures within the corridor and will stipulate that during the use permit and site planning process.

Instead, the focus will be on deploying only non-permanent structures such as solar arrays within this corridor, allowing flexibility for modifications to the Project's operations and ensuring efficient and unobtrusive development within these portions of the corridor. By focusing permanent improvements within areas of the Project that will not be affected by any future development of I-11, the Energy Center will be able to remain fully functional and produce energy at a consistent rate during any possible I-11 roadway construction in the future.

City Services:

The Project site will need to be served by a local fire district and be accessible to other city agencies for inspections during the construction phase and during ongoing operations, in case of emergency. Therefore, to ensure the well-being of workers and the longevity of the facility, EDFR will offer to reimburse the city to enlist third-party contracted inspectors to oversee construction work and monitor any necessary infrastructure improvements.

To be clear, the Developer intends to make the process of inspecting and managing the development and permitting of this project as simple as possible for the city and is willing to reimburse third-party inspectors and deploy them per the city's request. This initiative-taking approach demonstrates EDFR's dedication to creating a facility that not only prioritizes safety but also stands as a lasting asset for the City of Goodyear while simultaneously saving the City's Inspections Department valuable resources and time in the process.

As previously discussed, the Energy Center water usage requirements are extremely low, therefore no additional water services from the city of Goodyear will be needed for the ongoing operational use of the

site. The Energy Center will not require a permanent staff to be stationed at the Site, therefore no additional wastewater, sewer or fresh water supply is necessary for the Site.

Table 2, below, outlines the utility and services providers anticipate for the Subject Property:

Table 2: Utilities and Services

Utility or Provider	Service
Water	Onsite Industrial Well / Water Storage Tank
Sewer/ Wastewater	Not Needed
Electricity	SRP and APS Service Areas
Fire Station	Goodyear Fire Department Station #187 OR independent private provider or local Fire district
Police	Maricopa County Sheriff's Department
Emergency Services	Third- party Private Emergency Services
Telecommunications	Various

Site Access & Infrastructure Improvements

The Energy Center will help serve the current energy needs of the entire community by providing an additional renewable energy source mixed with reliable BESS. Additional utility, telecommunication, and transmission infrastructure will all be required to be constructed for support of the Energy Center's ongoing operations. Off-site right-of-way improvements will also be necessary to appropriately construct and develop the Site as well as to allow appropriate access to the Site by inspectors, fire and safety personnel and operations and maintenance staff.

Although the Energy Center will only require operations and maintenance staff to periodically (typically once every 2 to 3 months) visit the site for maintenance and inspections work, EDFR understands that adequate access to the Site is required. Therefore, the developer does expect to dedicate, improve, and maintain segments of current semi-improved roads and rights-of-way that will be used to access the Project Site.

The developer proposes the primary access to the Site be provided via S. 83rd Ave, connecting the entirety of the Site to State Route 238 situated north of the Project Site. Two (2) primary east-west aligned roads will connect both the northern and southern portions of the Site to S. 83rd Ave. Including Nahalia Rd, accessing the northern half of the Site that is currently within the City of Goodyear, and W. Schumacher Ln allowing access to the southern portion of the Site, herein the 'Annexation Property. Alternatively, the developer proposes the following Secondary access options: W. Fulcar Rd, accessing the Annexation Property and the southern portion of the Project Site to the east. W. Fulcar Rd. connects to N. Hidden Valley Rd. N. Hidden Valley Rd. offers two (2) alternative access routes via various semi-improved Pinal County Roads, which can provide access to both SR 238, north of the Project site, and SR. 347 aligned

south of the Site. Please see ***Exhibit 5: Site Access Map***, which describes all proposed Site Access routes and alignments.

All county roads and rights-of-way within or used to access the site boundary, not currently within Goodyear city limits, will be annexed into the City of Goodyear as part of this annexation request. Additionally, a Traffic Study will be conducted and submitted for review to the City of Goodyear's Traffic Engineer. This study, in part, will assess the current condition of the primary roads accessing the project site. The findings will inform the necessary level of improvements to ensure safe and effective access to the Site boundary during construction and ongoing operations of the Energy Center.

The roadway improvement standards will be developed and stipulated in consultation with the city reviewing authorities and any Fire District servicing the Site during the Site Planning phase of permitting. During which time both the level of roadway improvement and rights-of-way dedications appropriate for all fire, safety, and inspections personnel to access the Site will be determined.

Roadway Improvements:

The developer will improve, if necessary, any minor collector roads identified as primary access routes to the site, as detailed in ***Exhibit 5: Site Access Map***. As previously mentioned, the specific right-of-way segments recommended for improvement and the extent of these improvements will be determined based on a Traffic Study that analyzes roadway conditions, conducted during the Site Planning review of the Project.

The following roadway improvements standards are proposed:

- 1) All primary rights-of-way identified as "minor collector roads" shall have a subbase of compacted gravel, sufficient to provide safe access to the Site by fire and public safety vehicles, construction vehicles and equipment, and other operations & maintenance vehicles and equipment.
- 2) This standard is contingent on the recommendations provided in a Traffic Study, the requirements set forth by the local fire district and fire code and/ or deemed necessary by any other responsible agency who may be required to access the Site.

Right-of-way Dedication:

EDFR shall dedicate additional half-street rights-of-way for only roads formally designated as "minor collectors" and specifically proposed to be used as primary access to the Site:

The developer shall adhere to the following right-of-way dedication requirements for roads used for primary emergency and vehicular access to the Site:

- 1) Additional half- street dedications of no more than 55-ft (from centerline) of all "minor collectors" (as identified with the Counties adopted Comprehensive Plan-Transportation Map) used as primary access to the Site, or as deemed necessary by the city's Public Works Director prior to obtaining a building permit.

JUSTIFICATION OF REQUEST

Support and approval of this annexation request would incorporate the Annexation Property, which makes up the remaining portions of the Project site, including any currently maintained County roads and right-of-way found within the Annexation Property, into the City of Goodyear. The City will also be presented with a SUP request that will be stipulated not to take effect until and unless the final legal annexation is approved. The annexation will not be finalized until EDFR executes an off-taker agreement. No additional zoning or general plan amendments are required currently, and the SUP process gives the City the authority to condition approval on requirements that the Project be a benefit to the City and its residents.

Arizona Revised Statutes §9-471:

This proposed annexation conforms to the requirements of Arizona Revised Statutes §9-471:

A.R.S. §9-471 Section A.1 requires a “description and an accurate map of all the exterior boundaries of the territory contiguous to the city or town proposed to be annexed.” (See **Exhibit 4: Annexation Map**). As illustrated in the attached Exhibit, the requested annexation conforms with all conditions of Section H, fitting the requirements for a contiguous parcel of annexation (*Id.*). For the reasons stated below, this parcel is contiguous under the current Arizona annexation statute.

Under §A.R.S. 9-471, territory is not contiguous for the purposes of [annexation] unless:

- 1. It adjoins the exterior boundary of the annexing city or town for at least three hundred feet.***
 - The proposed annexation area borders the entire southern edge of parcel 300-30-001-A within the city of Goodyear for a linear distance of 2,651 feet.
- 2. It is, at all points, at least two hundred feet in width, excluding rights-of-way and roadways.***
 - The shortest boundary width of any annexed parcel encompassing the project area, at any point, is 661 feet extending horizontally across parcels 300-30-013K and 300-30-013M.
- 3. The distance from the existing boundary of the annexing city or town where it adjoins the annexed territory to the furthest point of the annexed territory from that boundary is not more than twice the maximum width of the annexed territory.***
 - The city of Goodyear’s southern-most boundary, which adjoins the proposed annexations, is situated along the northern-most boundary of parcel 300-30-008-L, the furthest point of the annexed project area is found along the southern-most boundary of parcel 300-30-013-H. The distance between these two boundaries is approximately 7,925 feet.
 - The maximum width of the project area is 5,285 feet from the western edge of parcel 300-30-035 to the eastern edge of parcel 300-30-008-L. Therefore, based on these provided dimensions, the distance is not more than twice the maximum width of the annexed project area and conforms to this provision.

Zoning and Land Use

§A.R.S. 9-471(M): *A city or town annexing an area shall adopt zoning classifications that permit densities and uses not greater than those permitted by the county immediately before annexation.*

RU-190 is a Maricopa County Zoning District requiring a minimum of 190,000 square feet per dwelling unit. Similarly, the *Agricultural District* allows agricultural, ranching, and related uses within the city, and acts as a “holding district” for annexed lands that have been used for agricultural purposes until a suitable rezoning occurs in the City of Goodyear ordinances (**COG ZO. Sec. 3-2-1(B)(1).**)

Agricultural Urban provides a low-density, estate-type residential use that allows for non-commercial agricultural uses and Large Animal and Small Animal privileges. *Id.* Given the residential component mentioned in *Agricultural Urban*, it is likely the most similar City of Goodyear zoning district to Maricopa County’s RU-190 is the AU zoning district and will likely adopt these standards.

Table 3 below depicts the current zoning for each site to be annexed from Maricopa County into City of Goodyear and the proposed zoning and General Plan designations assumed following the annexation. Because the proposed annexation is already included in the Goodyear General Plan planning area, the designations listed in the General Plan are assumed as the “like zoning” for the Maricopa County land when it is annexed.

Table 3: Current and Equivalent Zoning for Proposed Annexation

Parcel APN	Acreage	Current County Zoning	Goodyear Zoning equivalent	Goodyear General Plan Land Use Designation
300-30-028A	20.00	RU-190	AU	Scenic Neighborhood
300-30-028B	20.00	RU-190	AU	Scenic Neighborhood
300-30-012D, 300-30-012E & 12F	20.00	RU-190	AU	Scenic Neighborhood
300-30-013H	70.00	RU-190	AU	Scenic Neighborhood
300-30-008L	143.83	RU-190	AU	Scenic Neighborhood
300-30-031	40.00	RU-190	AU	Scenic Neighborhood
300-30-035	40.00	RU-190	AU	Scenic Neighborhood
300-30-008-K, 008-J, 030-B & 033-B	80.00	RU-190	AU	Scenic Neighborhood
300-30-033A	20.00	RU-190	AU	Scenic Neighborhood
300-30-030A	20.00	RU-190	AU	Scenic Neighborhood
300-30-013K	6.00	RU-190	AU	Scenic Neighborhood
300-30-013M	4.00	RU-190	AU	Scenic Neighborhood
300-30-008E	20.00	RU-190	AU	Scenic Neighborhood
300-30-013G	20.00	RU-190	AU	Scenic Neighborhood
300-30-008-M	82.5	RU-190	AU	Scenic Neighborhood
300-30-013-J	10	RU-190	AU	Scenic Neighborhood

300-30-930	11.37	RU-190	AU	Scenic Neighborhood
300-27-034-J	80.00	RU-190	AU	Scenic Neighborhood

TOTAL ACREAGE: 711.17 Acres

General Plan

This request intends to allow immediate development within the Project area and improve local infrastructure within the surrounding area, while bolstering economic viability and facilitating any future development within the vicinity, which has remained vacant and underdeveloped for decades. This annexation, and the concurrent SUP approval for future operations of this Energy Center, will demonstrate consistency with the city's General Plan, meeting all policies, objectives, and long-range land use goals for this area. This Project's impact on the surrounding area and current active land uses are expected to be negligible and will remain consistent with the character of the surrounding area soon.

Currently, approximately 1,356.10-acres of Project land are located within the City of Goodyear, of which 668.3-acres are managed by the Arizona State Land Department and zoned Goodyear Planned Area Development (PAD). The remaining Project area within the City of Goodyear (approx. 687.8-acres) are zoned Agricultural- Urban (AU) with a mix of Scenic and Traditional Neighborhood or Agricultural- Open Space land use designations. From north to south, the Goodyear General Plan- Future Land Use Map categorizes all portions of the site, including the areas proposed to be incorporated into the City of Goodyear as part of this request, as a mix of Neighborhood, Scenic Neighborhood, Agriculture, and Open Space.

As mentioned above, the entirety of the proposed annexation is included in the City of Goodyear General Plan- Land Use Map Boundary. This suggests that the city foresaw this area as part of its future planning goals as early as 2012. This also reveals that an extended review of this request, including a lengthy analysis to determine the most appropriate zoning of these parcels, may not be necessary in this case.

Additionally, the prior-mentioned land-use categories exhibit a preference for low-impact, low-density land uses, and for reasons detailed in this report, this Project proposal provides an economically viable use of the land without producing significant adverse impacts on the surrounding area. (See "Goals of the General Plan Accomplished by this Project" below):

Goals of the General Plan Accomplished by this Project:

- *Goal GD-8. A community that is sensitive and dedicated to preserving the unique nature of the Sonoran Desert. (Environmental Planning, Conservation)*
 - This project will endeavor to preserve the unique desert character of the environment, causing negligible impact to both the Project land and any land bounding the Site.
 - The land use and structures are considered interim, as the Energy Center will be decommissioned and removed at the end of the 39-year cycle.
- *Goal GD-9. A community that uses non-renewable resources responsibly and maximizes availability and use of renewable sources of energy. (Energy)*

- The Energy Center will increase the utility's access to renewable energy in an area that is currently undeveloped, offering a straightforward and compatible land use that integrates well with the surrounding area.
- The Energy Center presents a unique opportunity for the city to increase their exposure to renewable energy Projects, bolstering the city's energy portfolio while offering a valuable renewable resource to the local community.
- *Goal GD-6. An adequate volume and reliable supply of high-quality potable and non-potable water resources that meets both current and future needs. (Water Resources)*
 - The energy Center provides a profitable adaptation of the land without increasing strain on water resources, using little to no water.
 - The project will be self-sufficient, requiring no wastewater or sewer services. It will produce and store sufficient water onsite for operations, maintenance, fire prevention, and dust control without reliance on city services.

CONCLUSION

The Rainbow Valley Energy Center is anticipated to create hundreds of new employment opportunities, and generate millions of dollars of economic development, local tax revenue, and other direct and indirect financial benefits for the City of Goodyear and surrounding communities. This Project proposal is specifically designed to bolster the economic vitality of the City of Goodyear and the surrounding community immediately and facilitate positive and enduring alternative energy progress within this area of southern Arizona for years to come.

Support for the SUP and then subsequent Annexation of the Annexation Property will help support the feasibility of this significant effort, and we look forward to working with the City on it going forward.