

La Osa Power & Tech Project

Rezoning with PAD Overlay

Cases #PZ-003-26 and PZ-PD-003-26

Pinal County Board of Supervisors · August 26, 2026

EARL & CURLEY, PC

8.26.26

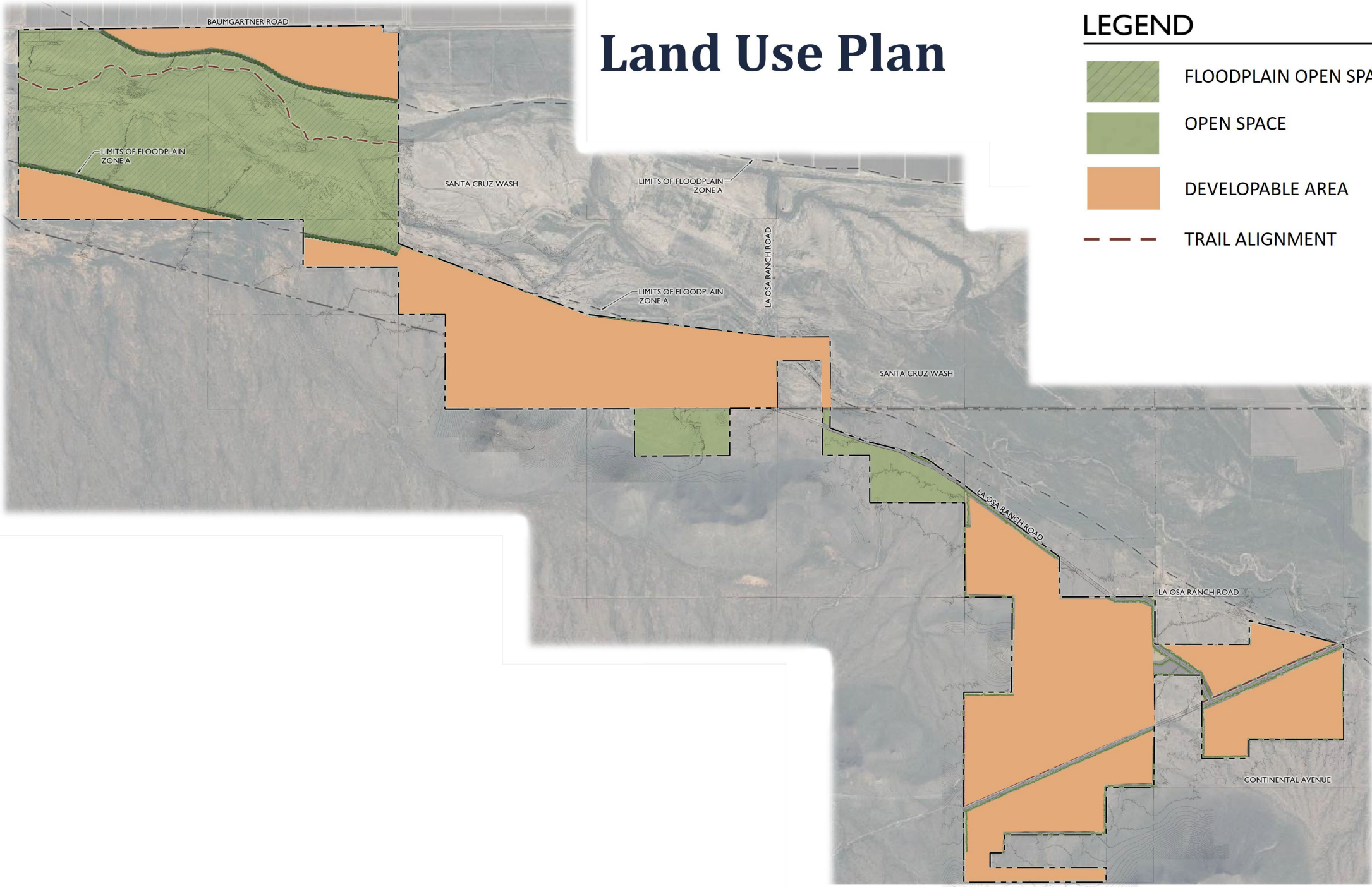
What are we seeking?

Rezone from General Rural (GR) to

- Industrial (I-3) (2,393 acres)
- Proposed Open Space (992 acres)

- Target Uses:
  - Data Centers (cap of 11 buildings)
  - Gas-Fired Power Generation (cap at 1,000 megawatts)
  - Battery Storage
  - Associated office and facilities

Land Use Plan



LEGEND

- FLOODPLAIN OPEN SPACE
- OPEN SPACE
- DEVELOPABLE AREA
- TRAIL ALIGNMENT

We Submitted 19 Additional Stipulations

— *Filed August 7, 2026*

Earl & Curley
ZONING & LAND USE LAW

Harvey Krauss
Planning Manager
301 E. 11th Street
Florence, AZ 85132
Harvey.Krauss@pinal.gov

August 7, 2026

Re: Additional Stipulations for La Osa Project to Address Community Concerns

Pinal County Planning Staff:

As representatives for the "La Osa Project," we are sending this letter to offer up additional stipulations that we propose be added as conditions of approval of the subject rezoning requests.

Along with our clients, we have carefully considered the concerns raised by the citizens during the previous Board of Supervisors meeting and are providing these stipulations to address those concerns. With these stipulations, we believe we have more than addressed the major concerns raised during that meeting.

These stipulations are in addition to the 33 stipulations already recommended for approval by staff and then the Planning and Zoning Commission, some of which already address concerns raised by the citizens.

New Stipulations:

34. The number of data center buildings within the Subject Property shall be limited to eleven, plus ancillary structures associated with each data center building.

35. No data center building shall exceed 400,000 square feet in gross floor area; plus ancillary structures associated with each data center building.

36. Owner shall comply with all applicable water-use regulations, service agreements, conservation requirements, and allocation limitations approved by federal, state, and local water providers serving the property.

37. Prior to the issuance of a building permit for any data center structure, the owner shall submit to the County Director of Development Services, a cooling technology disclosure identifying the proposed primary cooling method and provide an estimated water demand for the applicable phase.

38. The owner shall not use once-through cooling systems and shall limit water demand for on-site power uses to an aggregate of 600 net acre feet per year of potable water.

39. The owner may elect to negotiate with the County to reduce water usage or otherwise offset usage through a separate Effluent Purchase Agreement.

40. An annual water demand and usage report shall be filed with the County Manager of Pinal County, which is allowed to be made public on the County's website.

41. Water consumption attributable to any on-site power generation equipment shall be included in the estimated water demand disclosure and shall be supplied pursuant to the same water provider agreements applicable to the remainder of the property.

42. Water use associated with any such on-site power shall not exceed the per-acre consumption benchmarks applicable to other power generation or heavy industrial uses.

43. Owner agrees that, unless and until electric utility interconnection capacity is sufficient to serve the data center use that has been constructed, commissioned, and placed in service, any data center usage shall utilize on-site generation or behind the meter power generation facilities and associated infrastructure being constructed, owned, or operated by, or on behalf of, the owner.

44. Prior to the issuance of a building permit for any on-site power generation facility, the owner shall, in addition to any requirement of the County Code, submit to the County Director of Development Services, a power generation disclosure identifying the proposed generation technology, which will include the capacity in megawatts, and the primary fuel source. The disclosure shall include a summary of all applicable federal and state environmental permits required for the installation and operation of the on-site power generation equipment.

45. All on-site power shall meet or exceed emission standards for non-attainment zones and shall comply with I-3 zoning standards and will be subject to all applicable laws, including the zoning and permitting laws of the County.

46. In the event the owner pursues interconnection with a utility provider's transmission or distribution system, owner shall bear all costs associated with such interconnections, including studies, transmission upgrades, substation or switchyard construction or modification, and distribution system improvements.

47. Any on-site power generation facilities shall comply with all applicable requirements of the Arizona Department of Environmental Quality, the U.S. Environmental Protection Agency, the Federal Energy Regulation Commission, and the Arizona Corporation Commission.

48. Prior to the issuance of a building permit for any data center or on-site power generation facility, the owner shall commission and submit to the County a noise impact study prepared by a licensed acoustical engineer. The study shall identify existing ambient noise levels at all adjacent property lines, model projected operational noise levels at all noise levels from all material noise generating equipment and specify design measures to ensure compliance.

49. The campus shall be designed and constructed so that noise generated by the datacenter, on-site power generation, and electrical infrastructure does not exceed 60dBA between the hours of 8:00 a.m. and 9:00 p.m., and 55dBA between the hours of 9:00 p.m. and 8:00 a.m.

50. Within 90 days after the data center becomes operational, the owner shall commission a post-construction noise measurement study prepared by an acoustical engineer.

51. Any Battery Energy Storage System (BESS) associated with the Subject Property shall be designed, installed, and operated in compliance with applicable fire and life safety codes, including NFPA 855, as adopted and applicable. Prior to issuance of any building permit for a BESS, the Owner shall provide documentation to the County that demonstrates that the applicable fire district has reviewed the BESS plans for compliance with applicable adopted fire and life safety requirements.

52. The Owner shall include within the required Geotechnical Report, a geologic hazards evaluation, including a land subsidence and earth fissure investigation, prepared by a qualified geotechnical professional. The Owner shall incorporate into the development design and construction all mitigation measures identified in the evaluation as necessary to address geologic hazards associated with the development, including, without limitation, impacts to site grading, foundations, and underground infrastructure, consistent with applicable engineering standards and County requirements.

Sincerely,

Taylor C. Earl

Taylor C. Earl
Managing Partner
o (602) 265-0094

We submitted 3 more stipulations and tightened language of other stipulations

— *Filed August 14, 2026*

Earl & Curley
ZONING & LAND USE LAW

Harvey Krauss
Planning Manager
301 E. 11th Street
Florence, AZ 85132
Harvey.Krauss@pinal.gov

August 14, 2026

Re: Revisions to Additional Stipulations for La Osa Project to Address Community Concerns

Pinal County Planning Staff:

On August 7, 2026 we submitted a letter to Planning Staff offering Stipulations 34 through 52 as additional conditions of approval for the above-referenced cases. Those stipulations were offered in response to the concerns raised by residents and by members of this Board.

Since that filing, we have continued to review those comments as well as the Board of Supervisor's recent work study session on August 12th. Based on that additional analysis and information, we wish to update several stipulations previously offered to tighten up the language to make sure they better meet their intent, to clarify potential ambiguities, and to correct typos. We also offer three additional stipulations that place further restrictions on the project.

Below we have provided updates in redline format. New text additions are indicated like this, and deletions are indicated like ~~this~~.

34. The number of data center buildings within the Subject Property shall be limited to eleven, plus ancillary structures associated with each data center building. Ancillary structures may not be used for data center processing or data storage.

35. No data center building shall exceed 400,000 square feet in gross floor area; plus ancillary structures associated with each data center building.

36. Owner shall comply with all applicable water-use regulations, service agreements, conservation requirements, and allocation limitations approved by federal, state, and local water providers serving the property.

37. Prior to the issuance of a building permit for any data center or battery storage structure, the owner shall submit to the County Director of Development Services, a cooling technology disclosure identifying the proposed primary cooling method and provide an estimated water demand for the applicable phase.

38. ~~The owner shall not use once-through cooling systems and shall limit water demand for on-site power uses to an aggregate of 600 net acre feet per year of potable water.~~ The Owner shall not exceed an aggregate of 600 net acre-feet per year of potable water for all on-site data center, power generation, and battery storage uses, and all data center and battery storage buildings shall utilize only closed-loop systems for cooling and shall not use evaporative cooling towers, adiabatic cooling systems, or once-through cooling systems.

39. The owner may elect to negotiate with the County to reduce water usage or otherwise offset usage through a separate Effluent Purchase Agreement.

40. An annual water demand and usage report shall be filed with the County Manager of Pinal County, which is allowed to be made public on the County's website.

41. Water consumption attributable to any on-site power generation equipment shall be included in the estimated water demand disclosure and shall be supplied pursuant to the same water provider agreements applicable to the remainder of the property.

42. Water use associated with any such on-site power shall not exceed the per-acre consumption benchmarks applicable to other power generation or heavy industrial uses.

43. Owner agrees that, unless and until electric utility interconnection capacity is sufficient to serve the data center use that has been constructed, commissioned, and placed in service, any data center usage shall utilize on-site generation or behind the meter power generation facilities and associated infrastructure being constructed, owned, or operated by, or on behalf of, the owner.

44. Prior to the issuance of a building permit for any on-site power generation facility, the owner shall, in addition to any requirement of the County Code, submit to the County Director of Development Services, a power generation disclosure identifying the proposed generation technology, which will include the capacity in megawatts, and the primary fuel source. The disclosure shall include a summary of all applicable federal and state environmental permits required for the installation and operation of the on-site power generation equipment.

45. All on-site power shall meet or exceed emission standards for non-attainment zones and shall comply with I-3 zoning standards and will be subject to all applicable laws, including the zoning and permitting laws of the County.

46. In the event the owner pursues interconnection with a utility provider's transmission or distribution system, owner shall bear all costs associated with such interconnections,

including studies, transmission upgrades, substation or switchyard construction or modification, and distribution system improvements.

47. Any on-site power generation facilities shall comply with all applicable requirements of the Arizona Department of Environmental Quality, the U.S. Environmental Protection Agency, the Federal Energy ~~Regulation~~ Regulatory Commission, and the Arizona Corporation Commission.

48. Prior to the issuance of a building permit for any data center or on-site power generation facility, the owner shall commission and submit to the County a noise impact study prepared by a licensed acoustical engineer. The study shall identify existing ambient noise levels at all adjacent property lines, model projected operational noise levels at all ~~noise levels~~ adjacent property lines from all material noise generating equipment and specify design measures to ensure compliance.

49. The campus shall be designed and constructed so that noise generated by the datacenter, on-site power generation, and electrical infrastructure does not exceed 60dBA between the hours of 8:00 a.m. and 9:00 p.m., and 55dBA between the hours of 9:00 p.m. and 8:00 a.m, as measured from the nearest property line of the Subject Property.

50. Within 90 days after the data center becomes operational, the owner shall commission a post-construction noise measurement study prepared by an acoustical engineer.

51. Any Battery Energy Storage System (BESS) associated with the Subject Property shall be designed, installed, and operated in compliance with applicable fire and life safety codes, including NFPA 855, as adopted and applicable. Prior to issuance of any building permit for a BESS, the Owner shall provide documentation to the County that demonstrates that the applicable fire district has reviewed the BESS plans for compliance with applicable adopted fire and life safety requirements.

52. The Owner shall include within the required Geotechnical Report, a geologic hazards evaluation, including a land subsidence and earth fissure investigation, prepared by a qualified geotechnical professional. The Owner shall incorporate into the development design and construction all mitigation measures identified in the evaluation as necessary to address geologic hazards associated with the development, including, without limitation, impacts to site grading, foundations, and underground infrastructure, consistent with applicable engineering standards and County requirements.

53. Any discharge of cooling-system fluid, blowdown, water treatment reject or backwash, once-through cooling water, process wastewater, or humidification wastewater from the Subject Property shall comply with all applicable governmental laws, permits, and standards. No such discharge shall be released into any wash, drainage way, or directly onto the ground surface. Within 90 days following the end of each calendar year, the Owner

shall provide an annual report to the County disclosing whether any such discharge occurred during the prior year and, if so, identifying the nature and method of such discharge.

54. If, after construction, any data center, power-generation facility, or battery energy storage facility on the Subject Property permanently ceases operations and remains unused for a period of twenty-four (24) consecutive months, the Owner of the portion of the Subject Property containing such facility(ies) shall, at the request of the County, either: (a) decommission and remove such facility(ies) and restore the site to a safe condition within 24 months or (b) actively pursue an alternative tenant or use of such facility(ies).

55. The aggregate operational electrical generating capacity of all on-site power generation facilities on the Subject Property that generate electricity through the combustion of natural gas shall not exceed 1,000 megawatts, excluding generators installed and operated solely for emergency backup power, including routine testing and maintenance, and not for normal, continuous, or peak-shaving electrical generation.

With these stipulations, the project we are proposing will be highly regulated and controlled, while at the same time yielding attractive economic and public safety benefits to the County. We believe these 55 stipulations provide a robust set of protections that appropriately balance the property interests in this case.

Please let us know if there are any questions.

Sincerely,

Taylor C. Earl
Managing Partner
o (602) 265-0094
tearl@earlcurley.com

Highly Stipulated Project

Written conditions that run with the land — enforceable by the County.

11

DATA CENTER BUILDINGS
flat cap, Stipulation 34

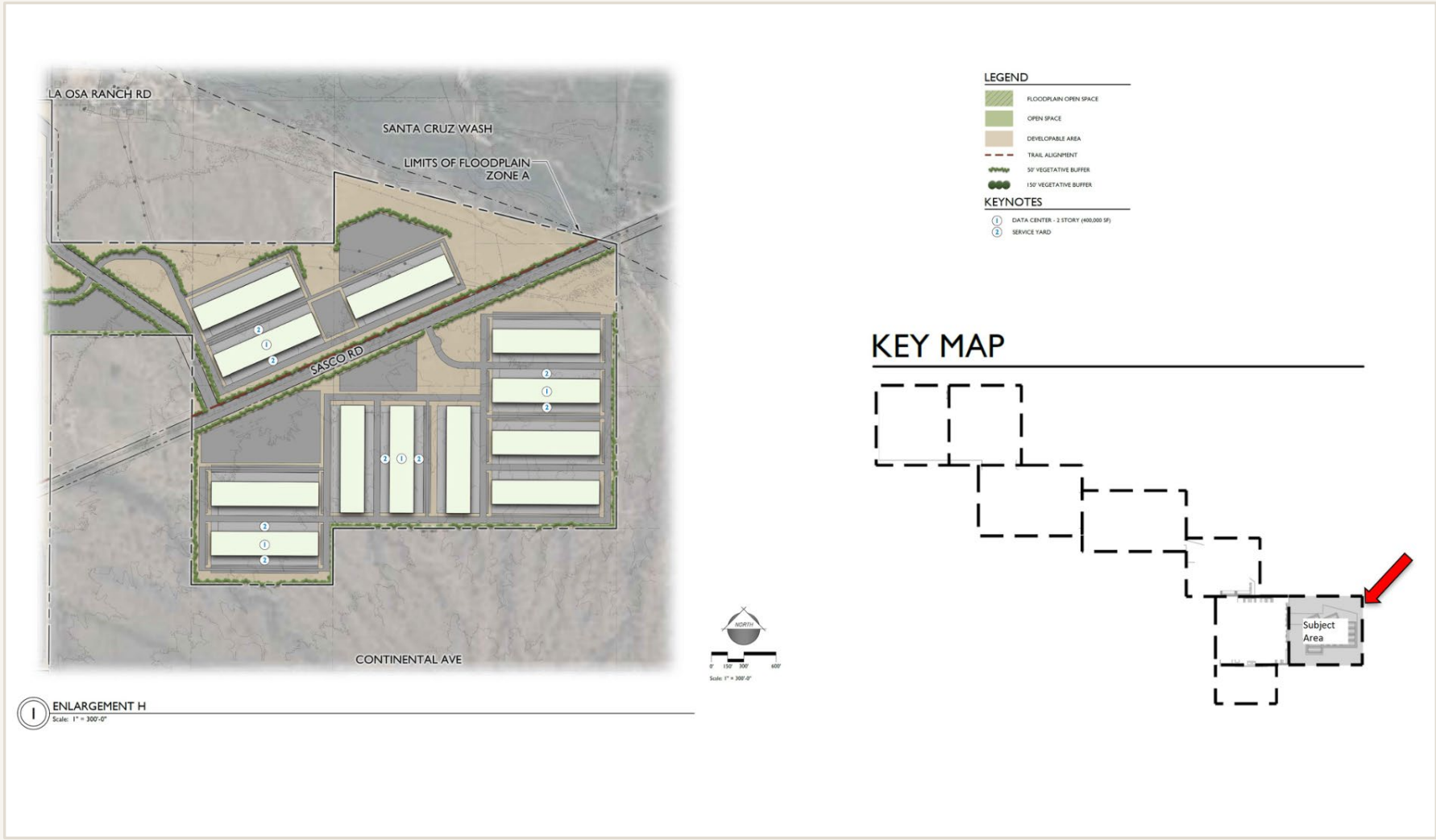
400,000 sq ft
maximum per building — Stipulation 35

Developer responsible for all power generation
on-site / gas-powered generation and funding of interconnection capacity (Stip 43)

Owner bears all costs associated with power
Including studies, transmission upgrades, substation or switchyard construction or modification, and distribution system improvements (Stip 46)

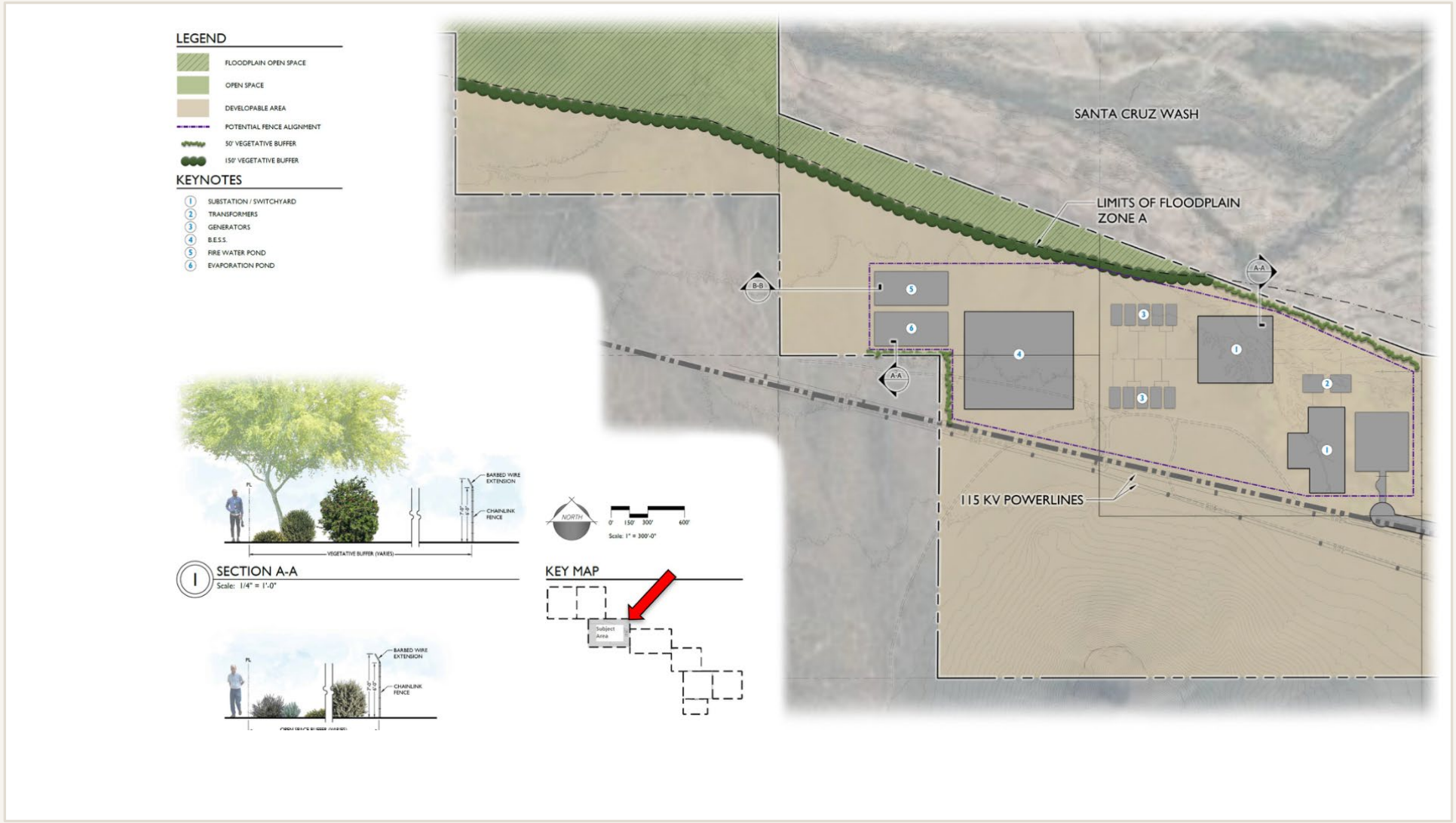
600 net AF/yr water cap for on-site power, data centers, and battery storage (Stip 38)
Disclosure before every data center or battery storage is built (Stip 37)

Example Layout — 11 Data Center Buildings



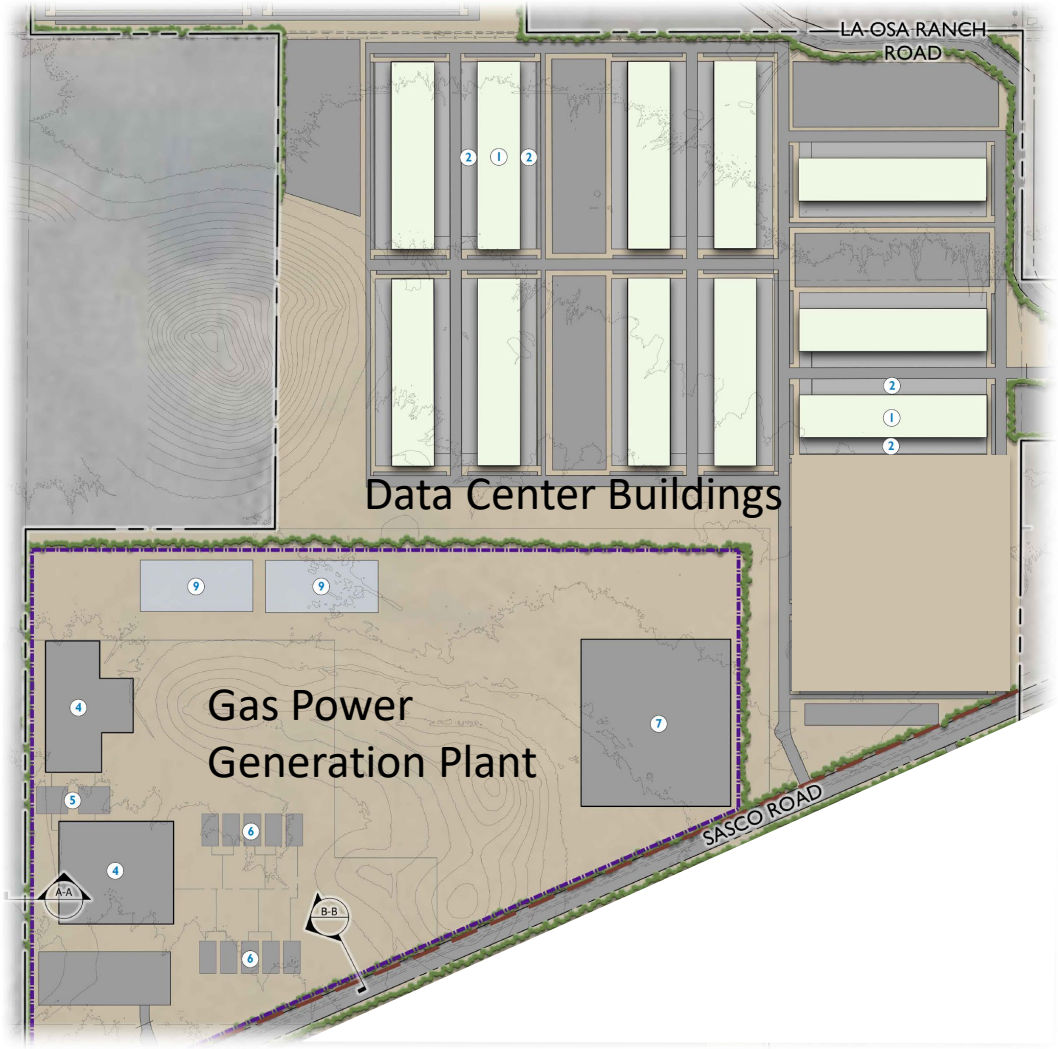
This is a conceptual example of where the 11 data center buildings may be located on the subject site. Final placement of buildings within subject property subject to future design work and County site planning and permitted process.

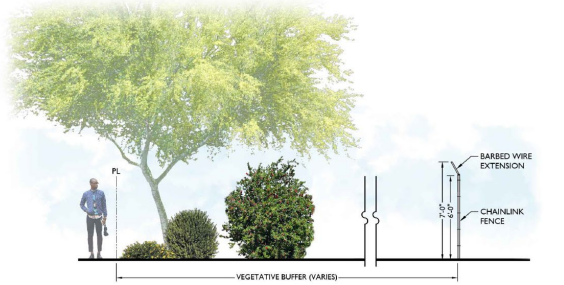
Example Layout — Gas Power Generation



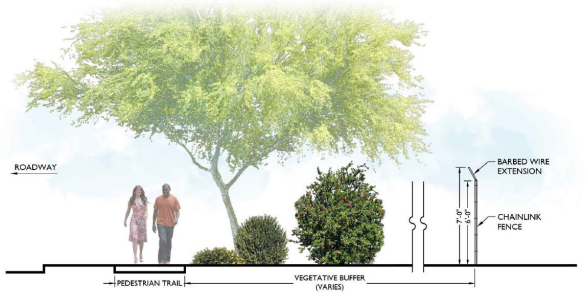
This is a conceptual example of where gas power generation may be located on the subject site. Final placement of buildings within subject property subject to future design work and County site planning and permitted process.

Example Layout of Gas Power Generation and 11 Data Center Buildings





2 SECTION A-A
Scale: 1/4" = 1'-0"



3 SECTION B-B
Scale: 1/4" = 1'-0"

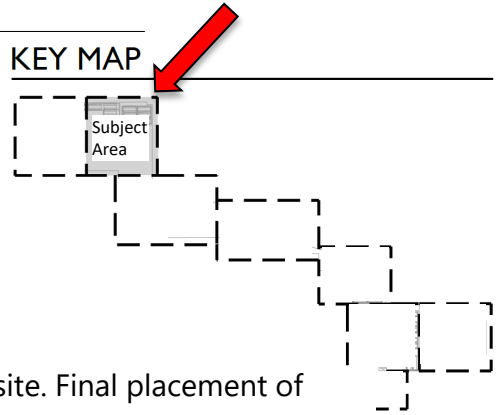
LEGEND

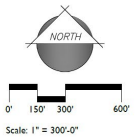
- FLOODPLAIN OPEN SPACE
- OPEN SPACE
- DEVELOPABLE AREA
- POTENTIAL FENCE ALIGNMENT
- TRAIL ALIGNMENT
- 50' VEGETATIVE BUFFER
- 150' VEGETATIVE BUFFER

KEYNOTES

1. DATA CENTER - 2 STORY (400,000 SF)
2. SERVICE YARD
3. EVAPORATION POND
4. SUBSTATION / SWITCHYARD
5. TRANSFORMERS
6. GENERATORS
7. B.E.S.S.
8. FIRE WATER POND

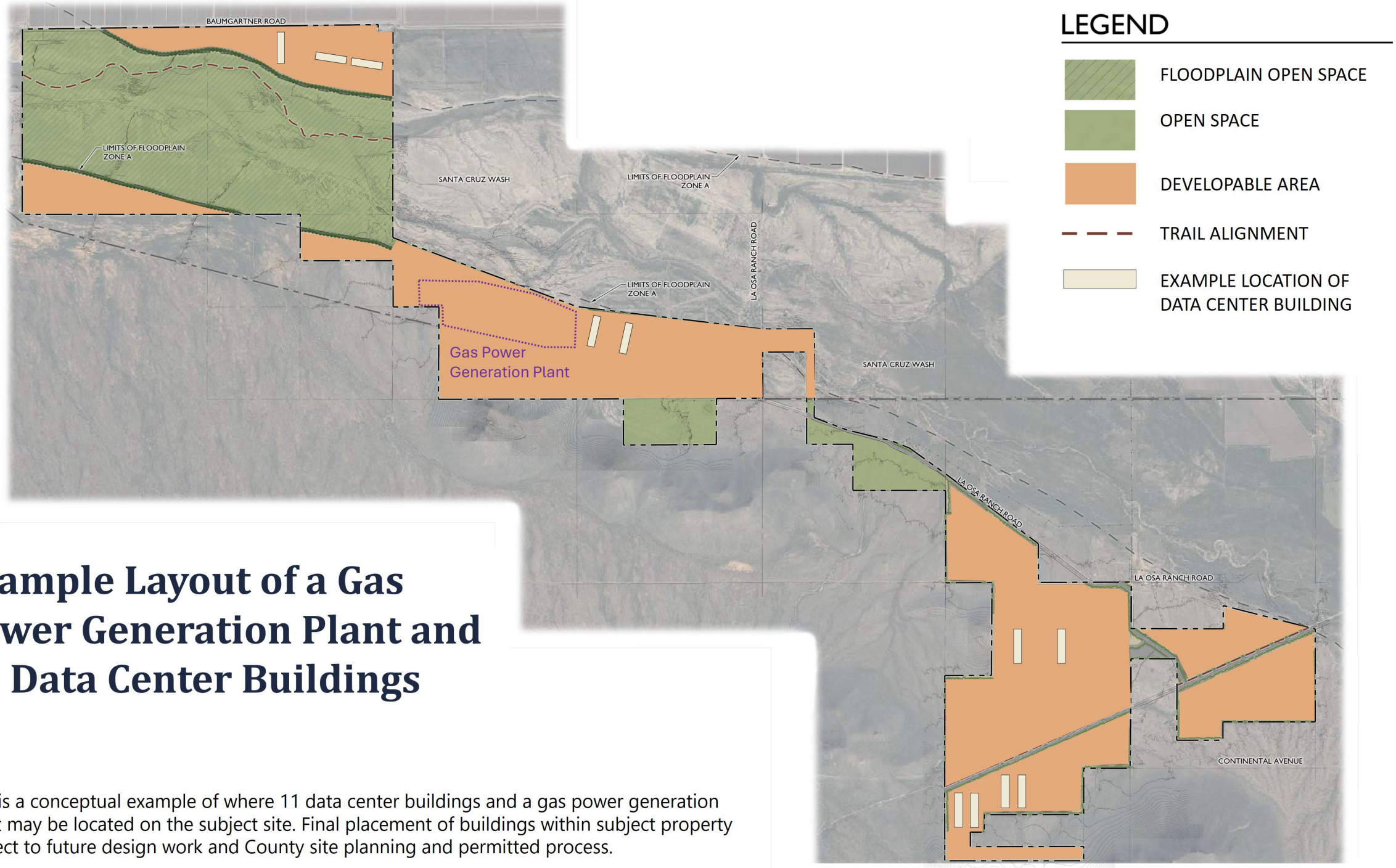
KEY MAP





Scale: 1" = 300'-0"

This is a conceptual example of where the 11 data center buildings and gas power generation may be located on the subject site. Final placement of buildings within subject property subject to future design work and County site planning and permitted process.

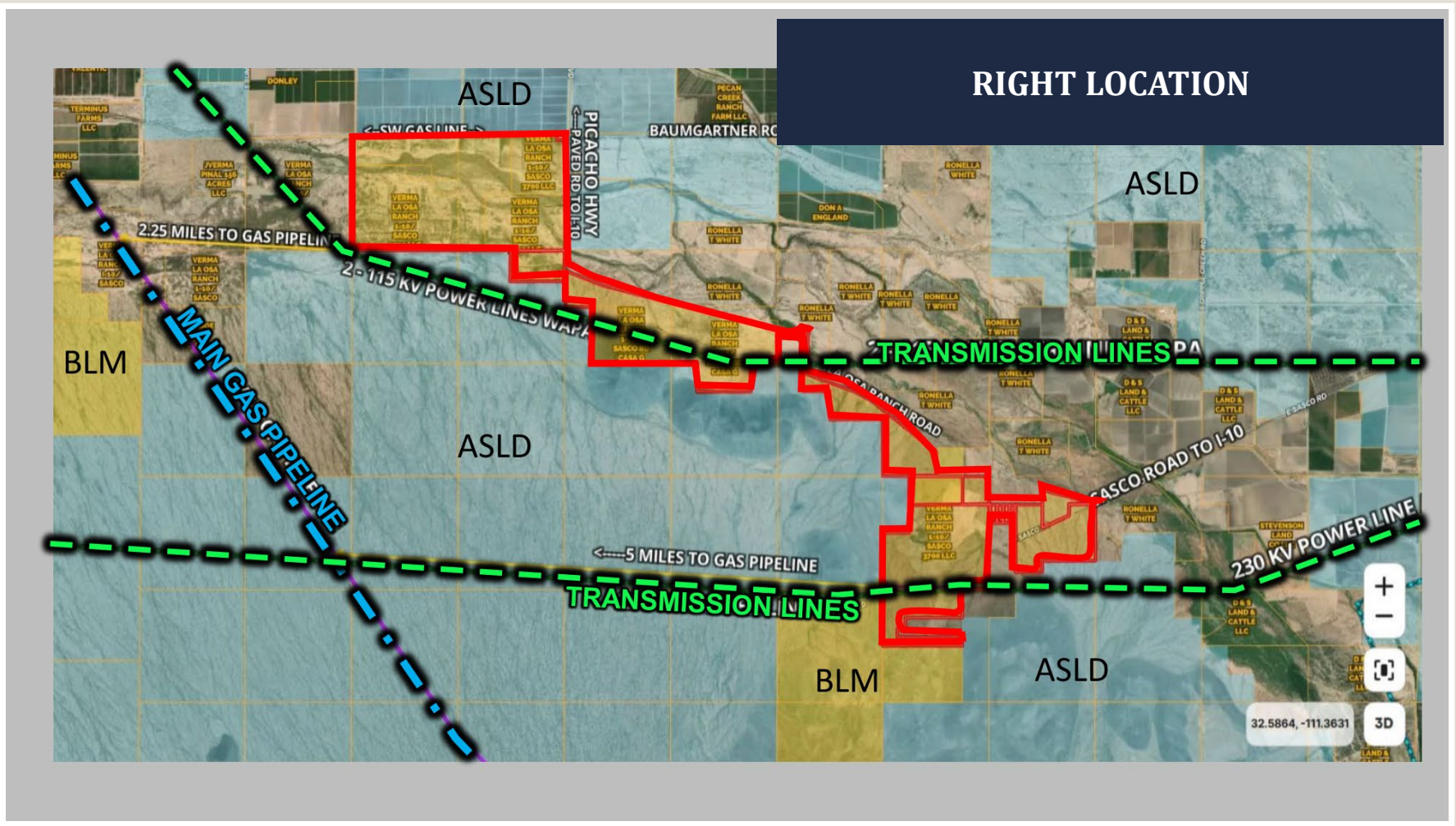


Example Layout of a Gas Power Generation Plant and 11 Data Center Buildings

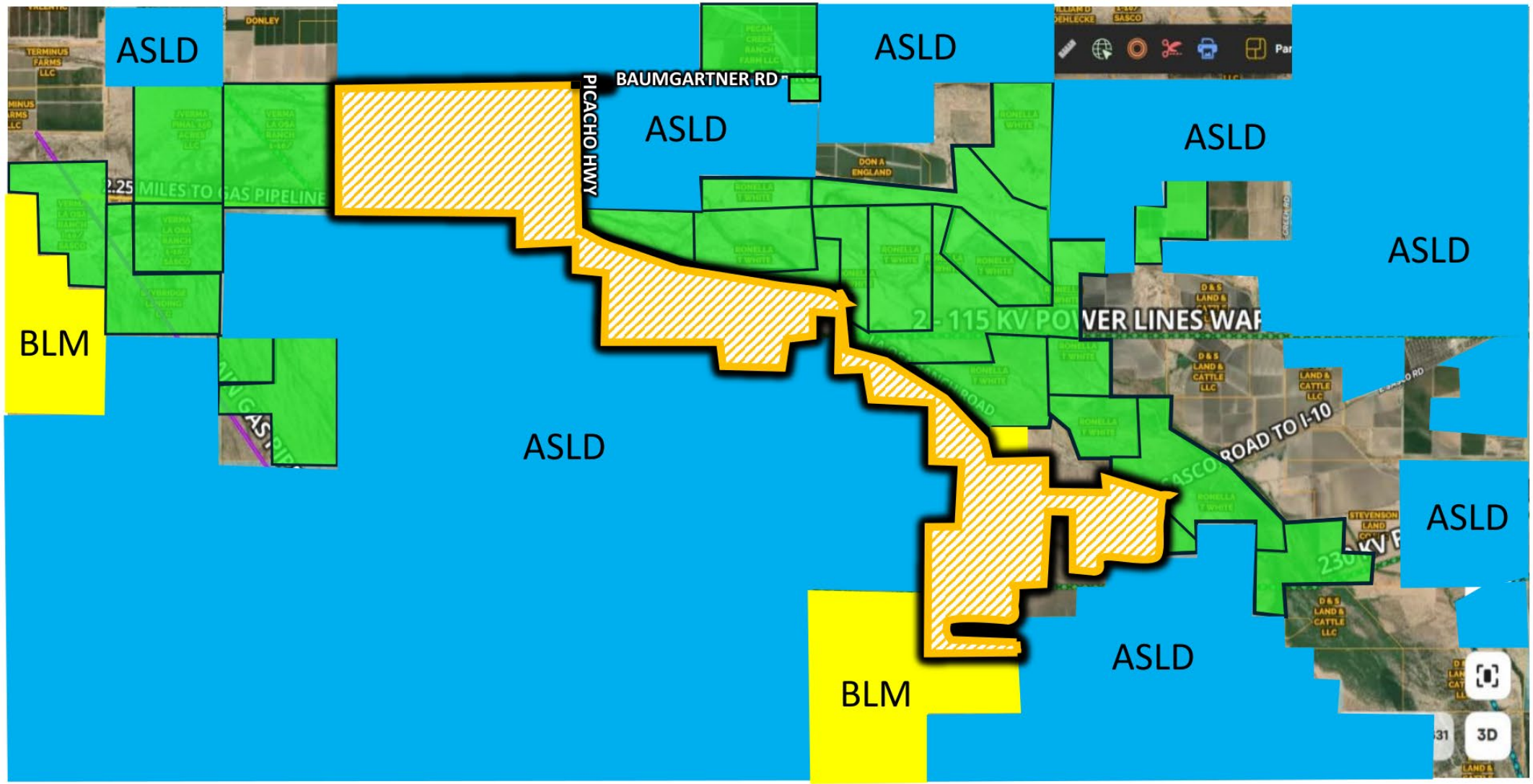
This is a conceptual example of where 11 data center buildings and a gas power generation plant may be located on the subject site. Final placement of buildings within subject property subject to future design work and County site planning and permitted process.

Right Location

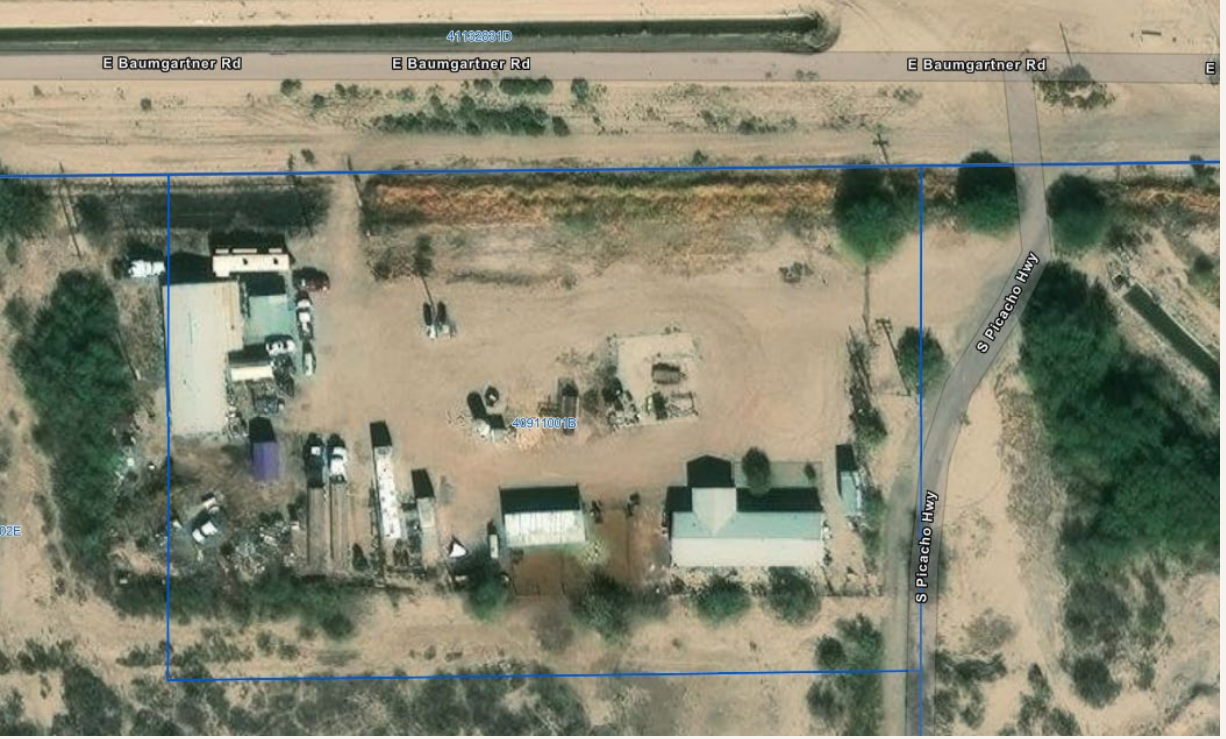
- Surrounded by State Trust and BLM land — not neighborhoods.
- 4 miles from Eloy's city limits, 12 from downtown
- *A century of irrigated farmland — not pristine land, and the first major investment here in two decades.*



Neighboring Property Owners Support La Osa Project



Green = supporting owners around the site · Pinal County Assessor / GIS parcel data, July 29, 2026

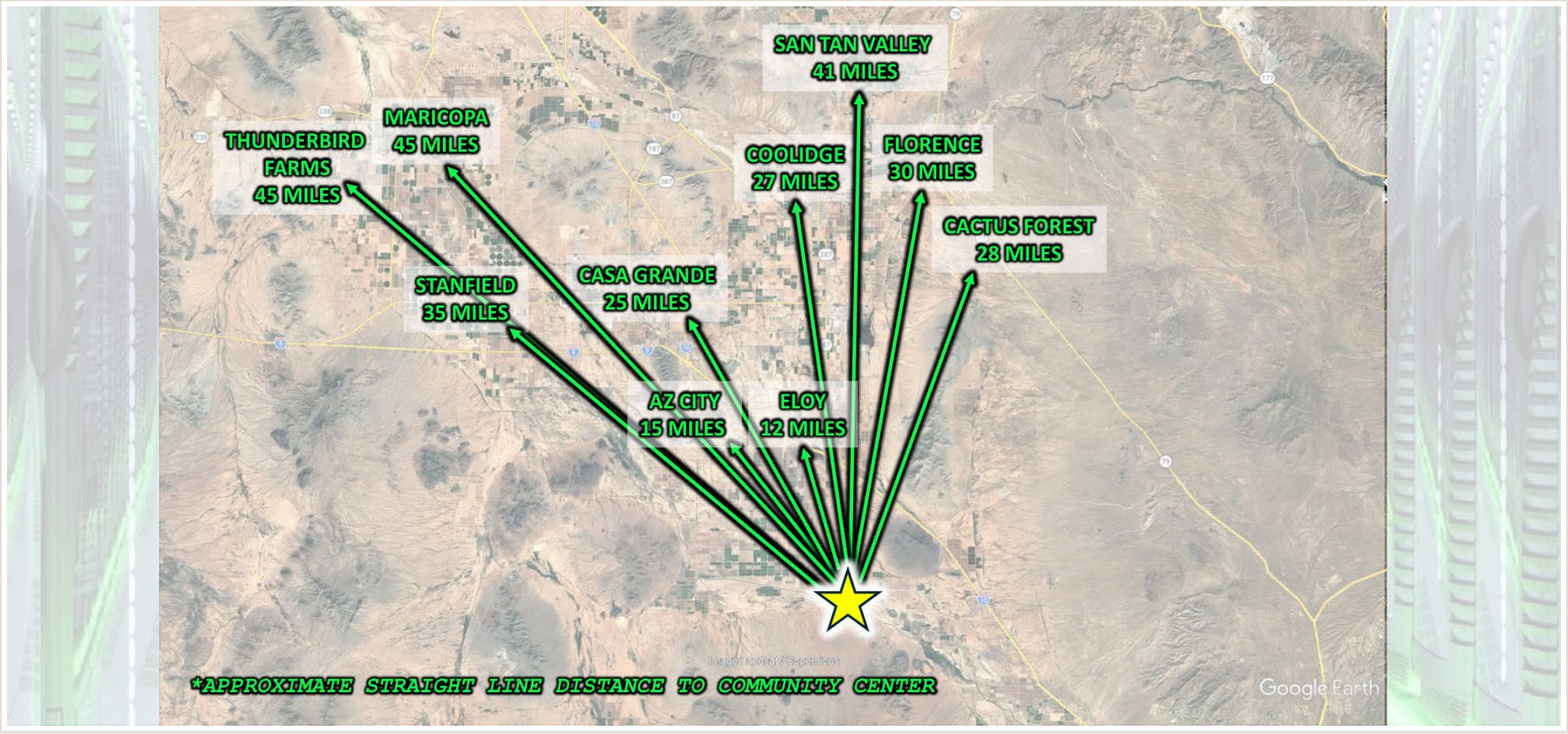


New Stipulation:

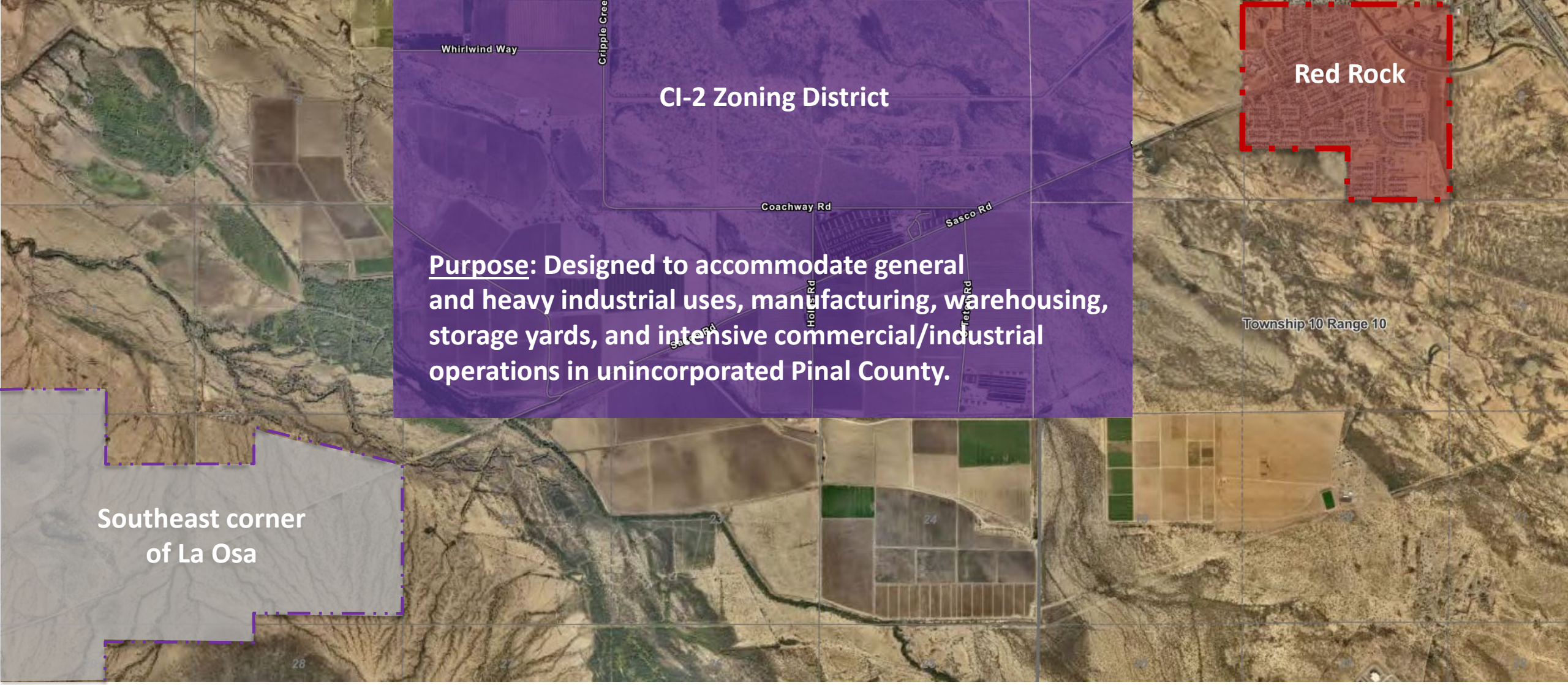
All data center buildings, power generation facilities, and accessory buildings shall be set back a minimum of 200 feet from, and a minimum 30-foot-wide landscape setback with trees planted a maximum of 20 feet on center shall be provided along, any property line shared with APN 409-11-001B.



If Not Here.... *then WHERE?*



Approximate straight-line distances to community centers ·



CI-2 Zoning District - Allowed Uses (All uses in CB-1, CB-2 and CI-1) along with the following uses:

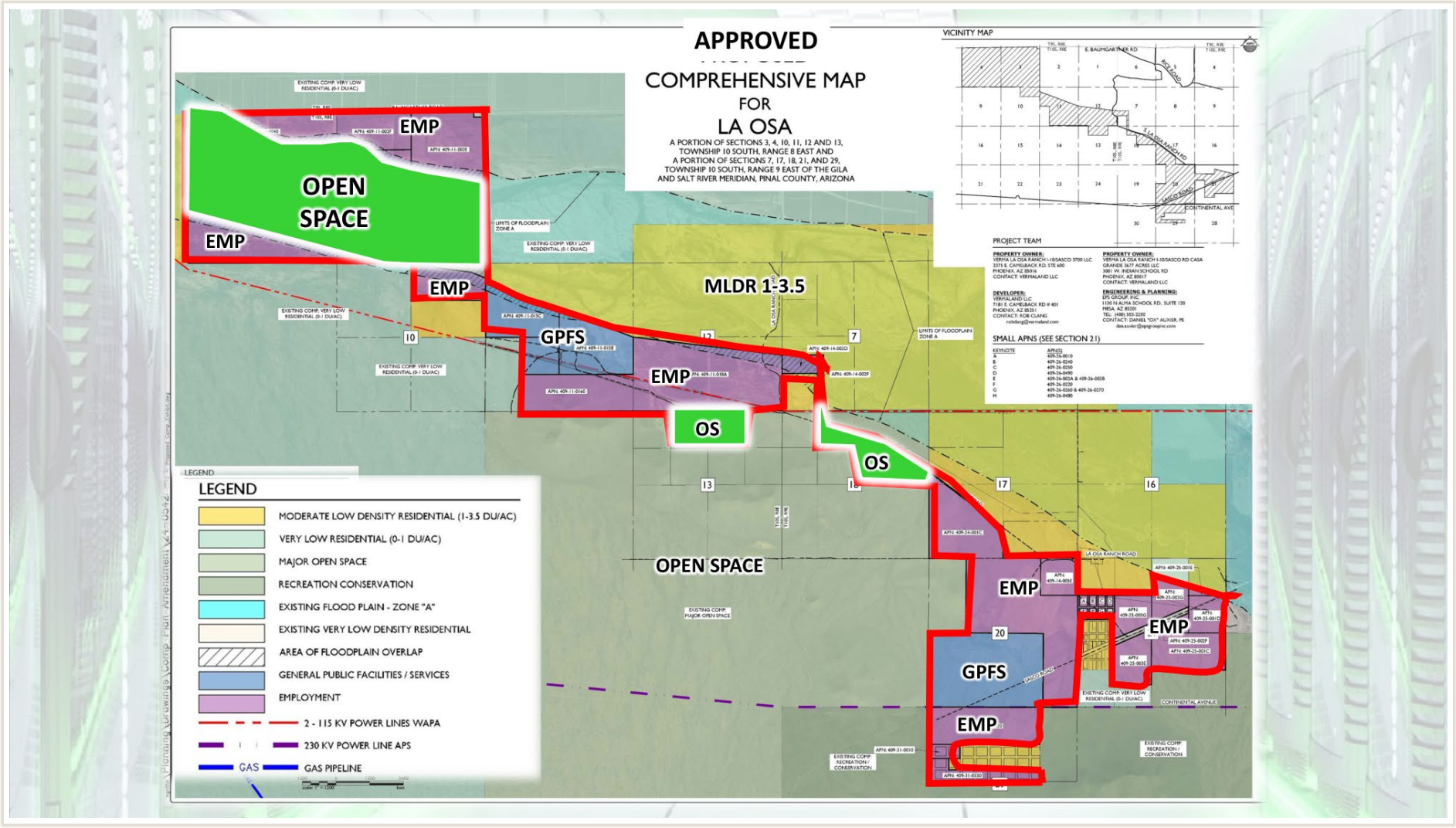
- Heavy Commercial
- Wholesale Business
- Meat packing
- Rock Crushing/Ore Plant
- General Industrial Operations
- Wholesale Business
- Manufacturing (Fertilizer, explosives)
- Sewer Farm/Smelting
- Slaughterhouse
- Auto wrecking/junk yard
- Blast Furnace/ Boiler Shops
- Fat Rendering/Hog yard
- Gravel Pit
- Petroleum Refinery
- Rubber Plant

Every Prior Vote on This Project Was Yes

11–4	**Pinal County Citizens Advisory Committee** Comprehensive Plan Amendment	September 4, 2025
7–3	**Pinal County Planning & Zoning Commission** Comprehensive Plan Amendment	October 16, 2025
5–0	**PINAL COUNTY BOARD OF SUPERVISORS** Comprehensive Plan Amendment — UNANIMOUS	**November 19, 2025**
7–2	**Pinal County Planning & Zoning Commission** Rezoning (PZ-003-26) and PAD	April 16, 2026

Approved Comprehensive Map

The land-use map this Board approved 5–0 on November 19, 2025 — employment, open space, and public-facility designations across the site.



Neighbors and Key Stakeholders Support

The people closest to the site are its strongest advocates.

GOVERNMENT & DISTRICTS

- **Electrical District 4 (ED4)**
- **CAIDD — Central Arizona Irrigation & Drainage District**
- **Avra Valley Fire District**
- **Arizona Commerce Authority**
- **Arizona Tech Council**

NEIGHBORS & LANDOWNERS

- **Pecan Ranch Farm**
- **Kyrene White**
- **Benning Farm**
- **Jim Hunter**
- **3 Rivers Ag Investments**
- **Louis & Mary Wagner**
- **Suncloud Ventures, LLC**
- **Petersen Property Management**
- **Ronella White**

Size and Scope of Project

New Stipulations

STIP 34 — CAP ON DATA CENTER BUILDINGS

Number of data center buildings capped at 11, plus ancillary structures.

STIP 35 — CAP ON SIZE

No data center building may exceed 400,000 SF, plus ancillary structures.

Water and Groundwater

Data Center Cooling

Per New Stipulation, Data Centers Will Use Only Closed-Loop Cooling

System filled — recirculates	**No evaporative cooling · no cooling towers · no plumes**	**All 11 buildings combined: ~2 AF/yr (Stip 37 disclosure)**

Derek McEachern, General Manager, ED-4 & CAIDD — signed letter to this Board, Aug 5, 2026:

"I am pleased that the project will be bound to use a closed loop cooling system that eliminates the need for active water use for cooling… these modern centers that are designed this way use far less water than other uses that could go in these locations."

Air Chilled Technology Increasingly Used in Arizona Market



- **Metro Phoenix's newest campuses are built around air-cooled, closed-loop systems** (*Uses little or no water for cooling — becoming an industry standard*)
- **Approx. ½ acre-foot per year** — total water use at a 2-million-sq-ft air-cooled Chandler campus (*Roughly two or three Arizona homes' use in a year)*
- **Five Major Data Centers in AZ**—Now using Air Chilling rather than Water to cool CPU's

At La Osa, these types of water protections will be required via stipulation, guaranteeing water protections

New Stipulations

STIP 36 — COMPLIANCE WITH WATER USE CONTROLS

Must comply with all applicable water-use regulations, service agreements, and conservation requirements and any allocation limits

STIP 37 — PROVE IT BEFORE YOU BUILD

Cooling-technology disclosure to the County before any data center or battery storage building is permitted.

New Stipulations

STIP 38 — THE BAN AND THE CAP

Closed-looped systems for data centers and battery storage; water use capped at 600 net acre-feet per year of potable water.

STIP 39 — USE OF EFFLUENT TO REDUCE WATER USAGE

May negotiate with County to reduce water usage using a separate Effluent Purchase Agreement.

STIP 40 — PROVE IT EVERY YEAR

Annual water demand and usage report — publishable on the County's website (including power generation (Stip 41)).

ED-4: “the aquifer easily accommodates this use”

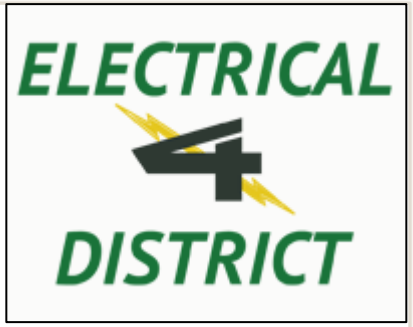
Derek McEachern, General Manager, CAIDD — signed letter to this Board, August 5, 2026 :“Further, even the predicted 600-acre feet of water to be used for the gas generation will easily be accommodated by our district. The water basin in the area has been historically healthy and maintained water levels that allow for easy access and ample use. We believe the aquifer can easily accommodate this use.”

Power & Rates

ED-4 Connection

Electric service will come from ED-4.

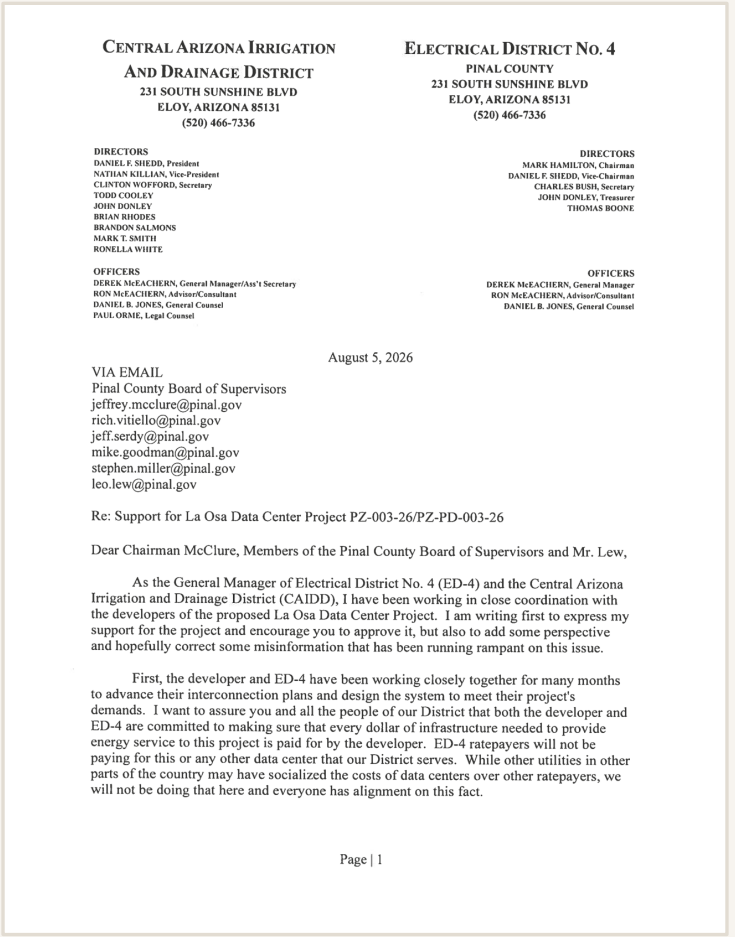
Three extensive interconnection studies already completed with ED-4



Project Will Pay for Its Own Power

FROM ED-4's GENERAL MANAGER, TO THIS BOARD on August 5, 2026:

"I want to ensure you and all the people of our District, that both the developer and ED-4 are committed to making sure that every dollar of infrastructure needed to provide energy service to this project is paid for by the developer. ED-4 ratepayers will not be paying for this or any other data center that our District serves. While other utilities in other parts of the country may have socialized the costs of data centers over other ratepayers, we will not be doing that here and everyone has alignment on this fact."



CENTRAL ARIZONA IRRIGATION AND DRAINAGE DISTRICT
231 SOUTH SUNSHINE BLVD
ELOY, ARIZONA 85131
(520) 466-7336

DIRECTORS
DANIEL F. SHEDD, President
NATHAN KILLIAN, Vice-President
CLINTON WOFFORD, Secretary
TODD COOLEY
JOHN DONLEY
BRIAN RHODES
BRANDON SALMONS
MARK T. SMITH
RONELLA WHITE

OFFICERS
DEREK McEACHERN, General Manager/Ass't Secretary
RON McEACHERN, Advisor/Consultant
DANIEL B. JONES, General Counsel
PAUL ORME, Legal Counsel

ELECTRICAL DISTRICT NO. 4
PINAL COUNTY
231 SOUTH SUNSHINE BLVD
ELOY, ARIZONA 85131
(520) 466-7336

DIRECTORS
MARK HAMILTON, Chairman
DANIEL F. SHEDD, Vice-Chairman
CHARLES BUSH, Secretary
JOHN DONLEY, Treasurer
THOMAS BOONE

OFFICERS
DEREK McEACHERN, General Manager
RON McEACHERN, Advisor/Consultant
DANIEL B. JONES, General Counsel

August 5, 2026

VIA EMAIL
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jeff.serdy@pinal.gov
mike.goodman@pinal.gov
stephen.miller@pinal.gov
leo.lew@pinal.gov

Re: Support for La Osa Data Center Project PZ-003-26/PZ-PD-003-26

Dear Chairman McClure, Members of the Pinal County Board of Supervisors and Mr. Lew,

As the General Manager of Electrical District No. 4 (ED-4) and the Central Arizona Irrigation and Drainage District (CAIDD), I have been working in close coordination with the developers of the proposed La Osa Data Center Project. I am writing first to express my support for the project and encourage you to approve it, but also to add some perspective and hopefully correct some misinformation that has been running rampant on this issue.

First, the developer and ED-4 have been working closely together for many months to advance their interconnection plans and design the system to meet their project's demands. I want to assure you and all the people of our District that both the developer and ED-4 are committed to making sure that every dollar of infrastructure needed to provide energy service to this project is paid for by the developer. ED-4 ratepayers will not be paying for this or any other data center that our District serves. While other utilities in other parts of the country may have socialized the costs of data centers over other ratepayers, we will not be doing that here and everyone has alignment on this fact.

Page | 1

SIGNED — August 5, 2026 — sent to all five Supervisors

Power — Extensive Analysis Already Done

ENGINEERING FEASIBILITY STUDY

A full transmission feasibility analysis was completed in February 2026 by an independent power-engineering firm: this site can be served, and every upgrade required to serve it is identified.

DONE

ED-4 UTILITY WITH ON-SITE GENERATION

ED-4 will be the utility for this project and on-site generation is part of the proposal.

DONE

INTERCONNECTION PLAN

Every required line, substation, and transformer identified and sequenced in coordination with ED-4. Upgrades will provide stability to grid.

DONE

COST ESTIMATES

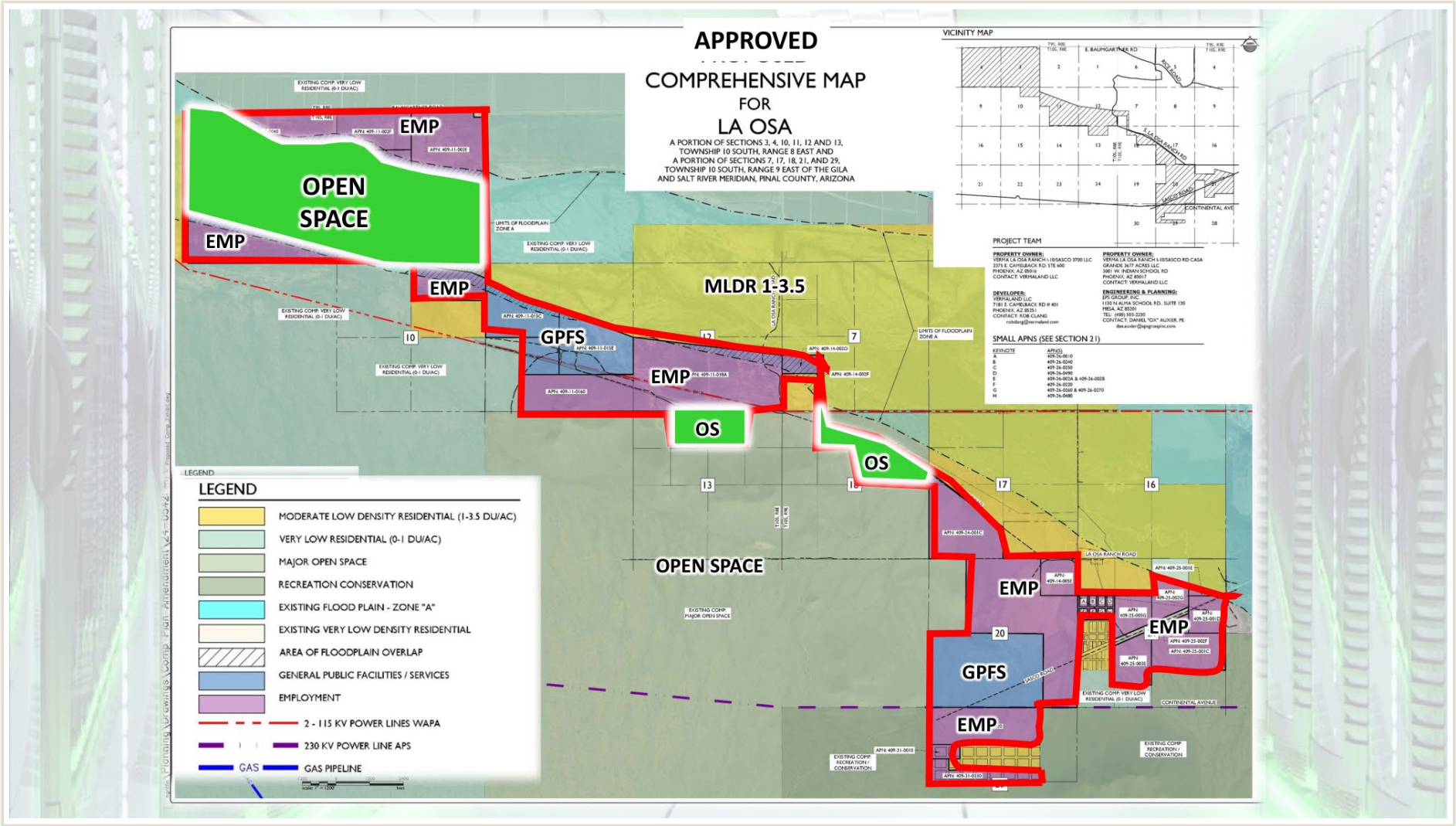
Every grid upgrade priced — roughly $150 million to serve this project — 100% funded by the project. Not one dollar from ratepayers.

DONE

Gas & Equipment for On-Site Power— *Ready*

IN PLACE	**INTERSTATE GAS AT THE SITE** The site sits on the Kinder Morgan El Paso Natural Gas system.
TERM SHEET	**FIRM 15-YEAR GAS SUPPLY** A 15-year enhanced firm gas supply is arranged with a national supplier, starts Nov 2027, delivered at the El Paso interconnect; up to 100,000 MMBtu/day.
READY	**TURBINES — QUEUE POSITION HELD** 200 MW of zero-hour, fully OEM-warrantied aeroderivative turbines confirmed available (supplier confirmed) — delivered and installed within 24 months.
FIBER CONNECTIVITY	**FIBER CONNECTIVITY** Fiber-optic connection achievable in approximately one year.

Approved Comprehensive Map



Recent Approval: Sunridge Gas Powered Plant

Sunridge Energy Center: 1,360 MW gas plant— approved 4–0 by Pinal County BOS on June 17, 2026.

SUNRIDGE STIPULATIONS OF APPROVAL	WHAT LA OSA WOULD BE STIUPLATED TO
No hard cap on water amount	Cap on water (600 AF/year) Water demand disclosed before EVERY data center bld Annual public water report
Decibel limits of 70 dba (day) and 65 dba (night)	Decibel limits of 60dba (day) and 55 dba (night)

Fire Infrastructure

Major Public Safety Support

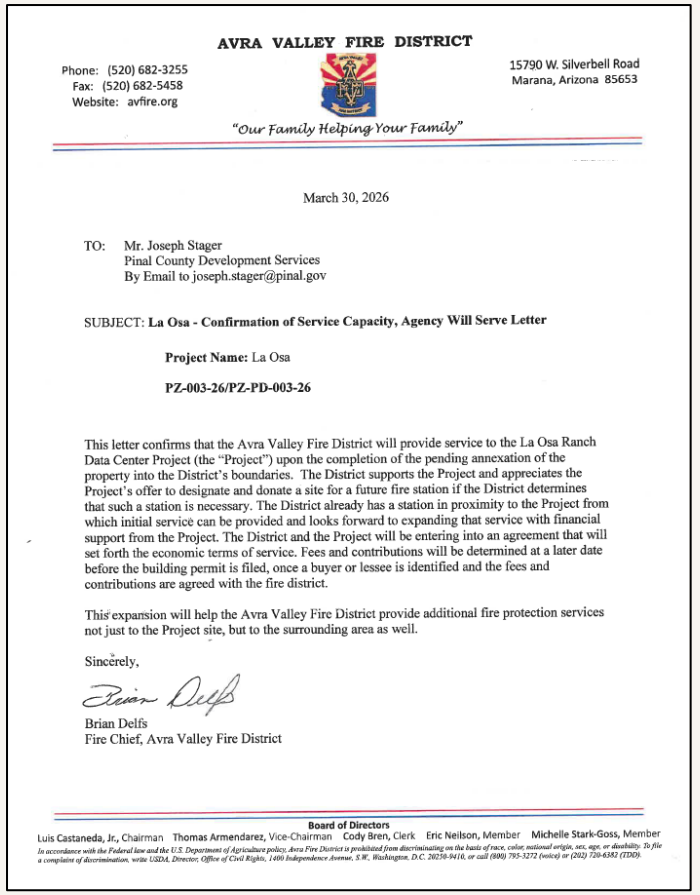
Will Service Letter and Donation of Fire Station site to Avra Valley Fire District

Signed Agreement to Fund Fire District Expansion

Expanding Fire service is Good for the region!

The District Provided Will-Serve letter (March 30, 2026) confirming service to the project upon annexation.

Developer commits to donation of site for a future fire station.



AVRA VALLEY FIRE DISTRICT

Phone: (520) 682-3255
Fax: (520) 682-5458
Website: avfire.org

15790 W. Silverbell Road
Marana, Arizona 85653

"Our Family Helping Your Family"

March 30, 2026

TO: Mr. Joseph Stager
Pinal County Development Services
By Email to joseph.stager@pinal.gov

SUBJECT: **La Osa - Confirmation of Service Capacity, Agency Will Serve Letter**

Project Name: La Osa

PZ-003-26/PZ-PD-003-26

This letter confirms that the Avra Valley Fire District will provide service to the La Osa Ranch Data Center Project (the "Project") upon the completion of the pending annexation of the property into the District's boundaries. The District supports the Project and appreciates the Project's offer to designate and donate a site for a future fire station if the District determines that such a station is necessary. The District already has a station in proximity to the Project from which initial service can be provided and looks forward to expanding that service with financial support from the Project. The District and the Project will be entering into an agreement that will set forth the economic terms of service. Fees and contributions will be determined at a later date before the building permit is filed, once a buyer or lessee is identified and the fees and contributions are agreed with the fire district.

This expansion will help the Avra Valley Fire District provide additional fire protection services not just to the Project site, but to the surrounding area as well.

Sincerely,

Brian Delfs
Fire Chief, Avra Valley Fire District

Board of Directors
Luis Castaneda, Jr., Chairman Thomas Armendarez, Vice-Chairman Cody Bren, Clerk Eric Neilson, Member Michelle Stark-Goss, Member

In accordance with the Federal law and the U.S. Department of Agriculture policy, Avra Fire District is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W. Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD).

Avra Valley Fire District — Confirmation of Service Capacity, Will-Serve letter, March 30, 2026

Example Layout of Data Center Buildings and Target Fire Station Site

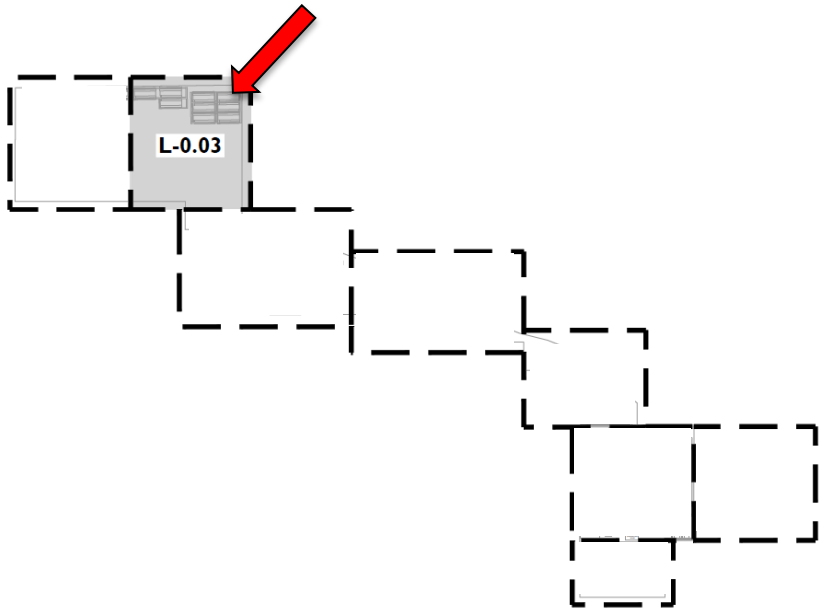


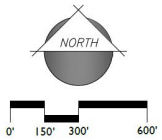
LEGEND

- FLOODPLAIN OPEN SPACE
- OPEN SPACE
- DEVELOPED AREA
- TRAIL
- 50' VEGETATIVE BUFFER
- 150' VEGETATIVE BUFFER

KEYNOTES

1. DATA CENTER - 2 STORY (400,000 SF)
2. SERVICE YARD
3. FIRE STATION





This is a conceptual example of where the fire station site and six data center buildings may be located on the subject site. Final placement of fire station site and data center buildings within subject property subject to future discussion with Avra Valley Fire District (for fire station site), design work, and County site planning and permitted process.

Updated Public Safety Support Letter

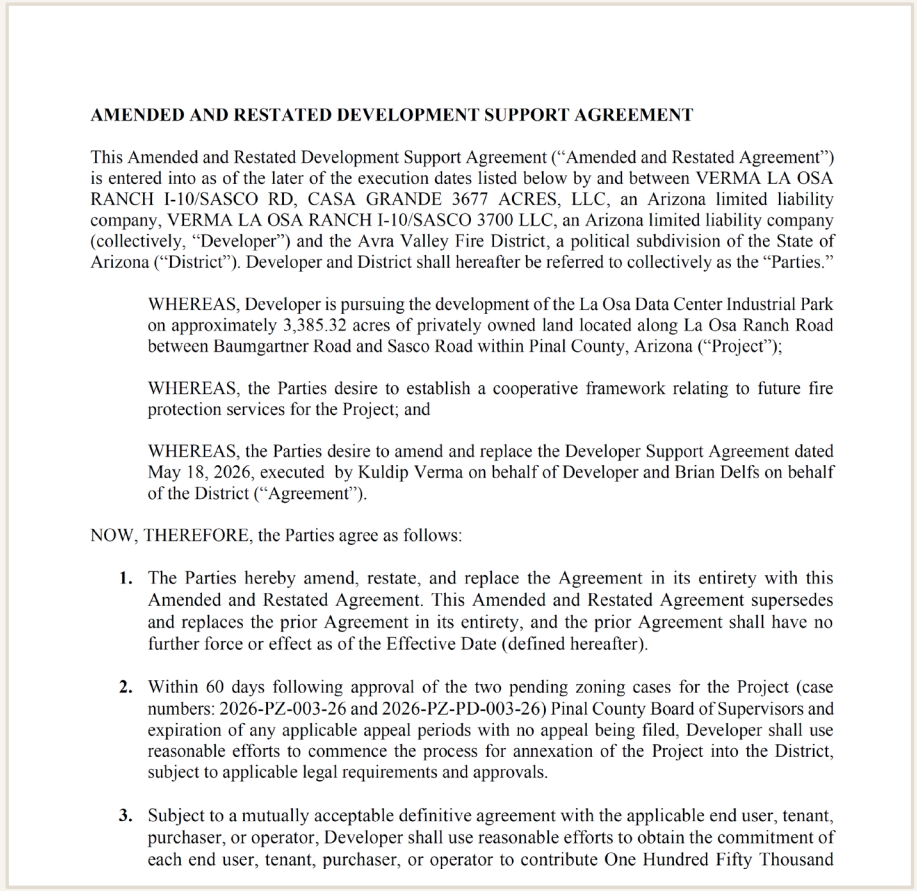
Will Service Letter and Donation of Fire Station site to Avra Valley Fire District

Signed Amended Agreement to Fund Fire District Expansion

Expanding Fire service is Good for the region!

Amended Development Support Agreement

Pursue annexation within 60-days of zoning vesting



AMENDED AND RESTATED DEVELOPMENT SUPPORT AGREEMENT

This Amended and Restated Development Support Agreement ("Amended and Restated Agreement") is entered into as of the later of the execution dates listed below by and between VERMA LA OSA RANCH I-10/SASCO RD, CASA GRANDE 3677 ACRES, LLC, an Arizona limited liability company, VERMA LA OSA RANCH I-10/SASCO 3700 LLC, an Arizona limited liability company (collectively, "Developer") and the Avra Valley Fire District, a political subdivision of the State of Arizona ("District"). Developer and District shall hereafter be referred to collectively as the "Parties."

WHEREAS, Developer is pursuing the development of the La Osa Data Center Industrial Park on approximately 3,385.32 acres of privately owned land located along La Osa Ranch Road between Baumgartner Road and Sasco Road within Pinal County, Arizona ("Project");

WHEREAS, the Parties desire to establish a cooperative framework relating to future fire protection services for the Project; and

WHEREAS, the Parties desire to amend and replace the Developer Support Agreement dated May 18, 2026, executed by Kuldip Verma on behalf of Developer and Brian Delfs on behalf of the District ("Agreement").

NOW, THEREFORE, the Parties agree as follows:

1. The Parties hereby amend, restate, and replace the Agreement in its entirety with this Amended and Restated Agreement. This Amended and Restated Agreement supersedes and replaces the prior Agreement in its entirety, and the prior Agreement shall have no further force or effect as of the Effective Date (defined hereafter).

2. Within 60 days following approval of the two pending zoning cases for the Project (case numbers: 2026-PZ-003-26 and 2026-PZ-PD-003-26) Pinal County Board of Supervisors and expiration of any applicable appeal periods with no appeal being filed, Developer shall use reasonable efforts to commence the process for annexation of the Project into the District, subject to applicable legal requirements and approvals.

3. Subject to a mutually acceptable definitive agreement with the applicable end user, tenant, purchaser, or operator, Developer shall use reasonable efforts to obtain the commitment of each end user, tenant, purchaser, or operator to contribute One Hundred Fifty Thousand

Amended Development Support Agreement — signed August 21, 2026

Public Safety Support

Will Service Letter and Donation of Fire Station site to Avra Valley Fire District

Signed Agreement to Fund Fire District Expansion

Expanding Fire service is good for the region

Benefits to County:

- A reserved fire-station site inside the project for expansion as necessary
- Funding that grows with every building permit
- Support for faster responses for Red Rock and the I-10 corridor

Public safety grows with the project — by signed agreement.

Sound, Air Quality & Fissures

Measured, Permitted, Studied — *and Bound*

SOUND

EXISTING (P&Z 28)

Best available sound-mitigation technology

NEW (48)

Independent acoustical study by a licensed engineer BEFORE any permit — ambient levels at every adjacent property line.

NEW (49)

Hard limits: 60 dBA (8am–9pm) / 55 dBA (9pm–8am) — campus-wide, including power generation.

NEW (50)

Post-construction noise measurement within 90 days of operation.

ENVIRONMENTAL

EXISTING (P&Z 31–32)

Industrial air permit required for generators; all construction under County earthmoving / dust rules.

NEW (44)

Full generation disclosure before any power-plant permit — technology, megawatts, fuel, and every required federal and state permit.

NEW (45, 47)

Emissions must meet or exceed non-attainment-zone standards and comply with requirements of ADEQ, EPA, FERC, and ACC.

FISSURES & GROUND

EXISTING (P&Z 6)

Geotechnical report reviewed and approved at site-plan stage.

NEW (52)

The geotechnical report must include a dedicated land-subsidence and earth-fissure investigation — with mitigation.

Measured, Permitted, Studied — *and Bound*

DISCHARGE	DECOMMISIONING	AGGREGATE POWER
NEW (53) Regulation of discharge to protect environment	**NEW (54)** Removal or replacement if power generational facility, data center, or battery storage building cease operation	**NEW (55)** Project's aggregate power generation capped at 1,000 megawatts

The 33 Original P&Z Commission Stipulations

Recommended with the rezoning on April 16, 2026 — every one stays in force. The 23 new stipulations add to them: 56 binding conditions in all.

ROADS & ACCESS 9 conditions	28-ft paved all-weather public access · Baumgartner as Regionally Significant Route · right-of-way dedicated free and unencumbered · offsite improvements per the traffic and drainage studies
ENGINEERING STUDIES 3 conditions	Drainage report · Traffic Impact Analysis · geotechnical report — each reviewed and approved at site-plan stage
ENVIRONMENT & HABITAT 12 conditions	150-ft Santa Cruz River / Greene Wash buffers · 50-ft riparian buffers · washes preserved · no invasive species · saguaro salvage and on-site replanting · wildlife-friendly fencing · native revegetation
CULTURE & TRAILS 4 conditions	Archaeological survey with mitigation · regional multi-use trails along Greene Wash and Sasco Road
OPERATIONS 5 conditions	Approved site plan required · best-available sound mitigation · dark-sky lighting (Zones 1–2, motion-sensored) · industrial air permit for generators · County dust and earthmoving rules

Full staff report and all 33 conditions: pinal.gov/1228/Planning-Zoning-Commission-Agendas → April 16, 2026 packet, cases PZ-003-26 / PZ-PD-003-26

56 stipulations being proposed

P&Z Commission Stipulations

- ROADS AND ACCESS
- ENGINEERING STUDIES
- ENVIRONMENTAL & HABITAT
- CULTURE & TRAILS
- OPERATIONS

New Stipulations

- SIZE AND SCALE
- WATER
- POWER & RATES
- FIRE SAFETY
- NOISE
- ENVIRONMENTAL
- GEOLOGICAL
- DISCHARGE
- DECOMMISIONING
- AGGREGATE POWER

We Said It on May 27 — *Then We Did It*

MAY 27	JUNE – JULY	AUGUST 7	AUGUST 26
We listened — and moved first Before a single speaker reached the podium, the applicant announced an 80% cut: 59 buildings down to 11 — and asked for time to put every commitment in writing.	**We did the homework** All 134 comment cards reviewed. Every speaker heard — the full hearing transcribed and catalogued. Independent economic studies updated for the smaller project. ED4 + CAIDD signed: ratepayers pay nothing; the aquifer accommodates 600 net acre-feet.	**We made it binding** 23 additional stipulations filed — 56 conditions in all	**The project the public asked for** Smaller. Highly regulated. Enforceable commitments.

Jobs & Economic Impact

Creating High-Wage Jobs – and Keeping More Pinal County Talent Close to Home

~360	~740	~13,000	$18.6B
direct jobs onsite	**Combination of direct and indirect permanent jobs**	**construction person-years** $1.0B construction wages	**total capital investment** 1,000 MW campus

Source: Elliott D. Pollack & Co.

- Once operational, the project will employ approximately **360 direct onsite jobs** with average wages exceeding **$83,300 annually** – helping provide local career opportunities and reduce the need for Pinal County residents to commute outside the county for quality employment.

- Every direct onsite position supports additional jobs among local suppliers, contractors, and consumer-facing businesses – supporting approximately **380 indirect and induced jobs** throughout the region.

More high-value careers in Pinal County = fewer workers forced to leave the county for opportunity.

Jobs per Acre-Foot: The Same Water Supports Nearly 150x More Jobs at La Osa

Estimated employment supported using the same annual acre-feet of water.
Note: Not all agriculture land is an extensive water user (grazing).

LA OSA	PINAL COUNTY AGRICULTURE
~740	**~5**
Total jobs supported	**Jobs supported**
Elliott D. Pollack Study (Updated Aug. 2026)	

A Lasting Source of Public Revenue

$31.6 MILLION in public tax revenue — every single year

$11.6M	$9.6M	$5.6M	$4.6M
School Districts	**Pinal County**	**Special Districts**	**State of Arizona**
largest annual share	sales, property taxes, others	fire, flood, college	annual at buildout

PLUS ONE-TIME CONSTRUCTION REVENUES

$129.4M all jurisdictions · **$100.8M** State · **$28.6M** Pinal County

Schools receive the largest annual share — $11.6M a year

Source: Elliott D. Pollack & Co.

Property Tax Impact: A Larger Tax Base Can Lower Rates for Residents

The project expands the tax base – reducing the burden on residents and other property owners.

$135.4M
new net assessed value
added to the local property-tax base

$20.4M/yr
gross property taxes
paid by the project at build out

$9.4M/yr
resident & business SAVINGS
same levies, lower rates

ESTIMATED SAVINGS FOR AN AVERAGE HOMEOWNER, BY WHERE THEY LIVE		
Pinal County (countywide average)	$23.48 / yr	1.1% lower
Eloy Elementary School District	$86.90 / yr	16.0% lower
Santa Cruz Valley Union High School District	$188.08 / yr	20.2% lower
Avra Valley Fire District	$489.51 / yr	30.6% lower

Source: Rounds Consulting Group, Inc.

Some Pinal residents could see their property tax rates fall by up to 30%.

Rewards: A High-Value Investment in Pinal's Future

- Creates high-wage, skilled jobs close to home.
- Generates annual revenue for schools and essential public services.
- Expands the tax base and reduces pressure on existing taxpayers.
- Developing a private sector partner for additional high-tech discussions.

Risks: Signals and Procedures

- Take great care in the signal that is sent to the private sector, other communities will be monitoring as well.
- Data centers and high-tech tend to cluster with one another, make sure not to miss any opportunities for high-wage job development.
- Economic development vs data center procedural plan (similarities or differences).
- Take care to not miss opportunities for collaboration with the private and academic sectors (UA).

The Public Process Worked

PUBLIC HEARINGS

La Osa has been reviewed and voted on in four public hearings. All have approved.

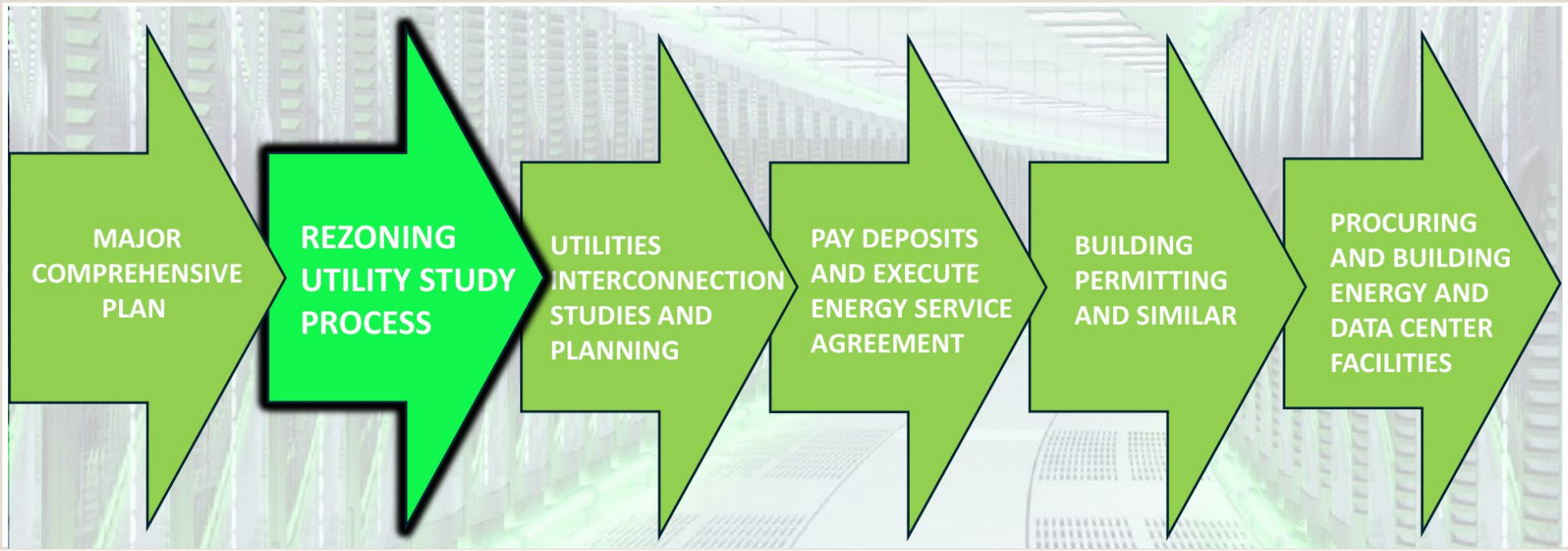


EFFECT OF PUBLIC REVIEW

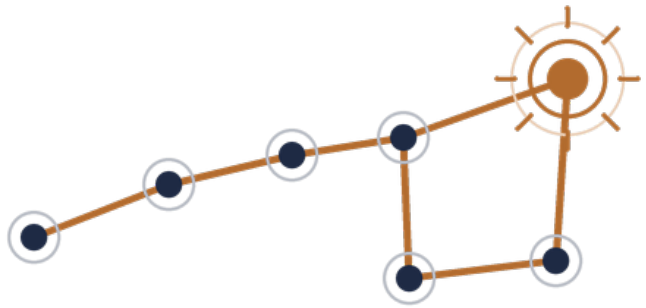
SCOPE REDUCED TO 11 BUILDINGS

56 PROPOSED STIPULATIONS

Datacenter Development Process



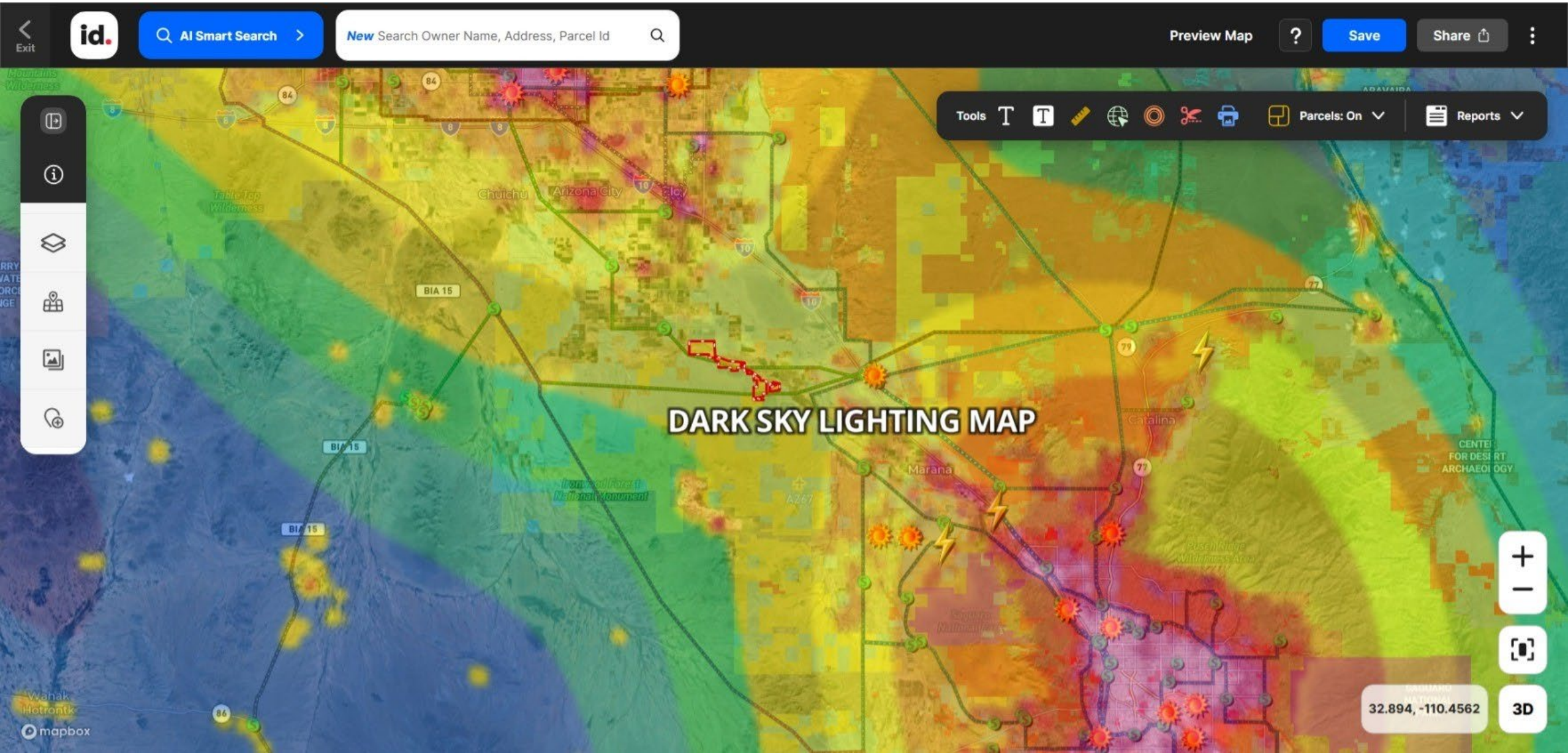
Approving the rezoning starts the studies — it does not start construction.
Every later step carries its own permits, deposits, and County review.



Thank You

The mark: La Osa — the Great Bear. The seven stars of the Big Dipper (Osa Mayor), redrawn as a power grid: six grid nodes tracing the constellation, converging on Dubhe, its brightest star — here, the generation node that powers the campus and strengthens the grid that the county already relies on.

LA OSA · AI COMPUTE · PINAL COUNTY, ARIZONA


Exit
id.
AI Smart Search
New Search Owner Name, Address, Parcel Id
Preview Map
Save
Share
Tools
Parcels: On
Reports
DARK SKY LIGHTING MAP
Chuichu
Arizona City
Marana
Catalina
BIA 15
32.894, -110.4562
3D
mapbox