[Your Name]
[Street address]
[City], AZ [ZIP]
[Phone] · [Email]

[Date]

Christine McLachlan, AICP, Director
Cochise County Development Services
1415 W. Melody Lane, Building F
Bisbee, AZ 85603

cc: Cochise County Planning and Zoning Commission; Cochise County Board of Supervisors

Re: Request for studies under Zoning Regulations Section 2.51.240 before any hearing on the Tombstone Resources L.L.C. Special Use Authorization application (data center, approximately 747 acres, U.S. Highway 191, Cochise), filed October 30, 2026

Dear Director McLachlan:

I am a resident of Cochise County, Arizona. I am writing to ask that the County use the authority in its data center ordinance, Section 2.51.240, to require the studies listed here before the application is scheduled for a Planning and Zoning Commission hearing.

The application asks the County to approve a campus of up to 6,000 megawatts at once: nine buildings of about 493,000 square feet each, thousands of battery units, and up to about 5,500 construction workers working around the clock. Yet it defers its noise study, biological assessment, traffic impact analysis and drainage report until after approval. The Commission cannot weigh the ten Special Use factors, including compatibility, infrastructure, off-site impacts and water use, without them.

1. Studies we ask the County to require

1. **Noise impact analysis (Sec. 2.51.240.3.d).** The application gives no decibel figures and proposes to confirm a property-line level "consistent with the surrounding rural industrial area" only at building permit (application p. 10; Operations Narrative §7). We ask for a study that measures existing day and night sound levels at the nearest homes and at the Apache Station crane roost; includes low-frequency sound; models all four phases, including dry coolers, transformers, generator testing and 24-hour construction; and proposes numeric limits.
2. **Traffic impact analysis (Sec. 2.51.240.3.g).** The applicant estimates up to 80 buses, 1,000 to 1,300 cars and 150 to 250 trucks a day on U.S. 191 at peak (p. 8). The study should include the park-and-ride locations and where the construction workforce will live.
3. **Drainage and floodplain study (Sec. 2.51.240.3.g).** The concept plan places a detention facility in the 100-year floodplain at the edge of the Willcox Playa (p. 22).
4. **Wildfire and battery hazard assessment (Sec. 2.51.240.3.g and 5.d).** The AEPCO property alone shows 2,520 battery units (p. 45). The fire plan is to let an involved unit "burn out" (p. 36), and the site is outside any fire district with no response agreement in place. We ask for total battery capacity, an analysis of smoke and toxic gas from a battery fire, a neighbor warning and evacuation plan, and a confirmed agreement with a fire district that can respond.

5. **Visual impact study (Sec. 2.51.240.3.g).** It should show views of buildings about 1,900 feet long and 40 feet tall, and of the cooler banks, from U.S. 191 and from nearby homes.
6. **Biological assessment (Sec. 2.51.240.3.g).** The application commits to one only "before ground disturbance" (pp. 2, 29). The Arizona Game and Fish Department lists AEPCO's Apache Station as a sandhill crane roost, and the site borders the Willcox Playa, an Important Bird Area. We ask that the assessment be completed and reviewed by Arizona Game and Fish before the hearing.
7. **Complete water information (Sec. 2.51.240.3.e).** The water narrative leaves out construction water (pp. 11, 32). We ask for construction water by phase and its source; confirmation of whether any well will be drilled; the source of trucked water; and whether diverting Apache Station wastewater from its evaporation ponds would affect crane habitat.
8. **Utility adequacy for all phases (Sec. 2.51.240.3.c and 5.i(1)).** AEPCO confirms only that Phase 1 appears feasible; later phases "are expected to require additional generation and transmission facilities" (p. 53). We ask that the applicant show where that generation and transmission would be built, or that any approval be limited to what has been shown feasible.

2. Items missing from the application

1. A signed owner authorization and Proposition 207 waiver from Southline Transmission, owner of about 348 of the 747 acres. Only AEPCO's is included (pp. 3, 13), and the owner signature on the application form is blank (p. 5).
2. Final, dimensioned site plans. Both sheets are marked "DRAFT," with no scale, and their power totals (3,500 plus 2,800 MW) differ from the 6,000 MW stated in the text (pp. 22–23).
3. Correct code references. The application cites "Section 2.51.040" and "Ordinance 26-09"; the data center rules are Section 2.51.240, amended by Ordinance 26-06.
4. Disclosure of who owns and controls Tombstone Resources L.L.C., and who its "affiliates" are (pp. 8, 35).

3. Citizen review

The October 17 notice to neighbors did not mention the project's 6,000-megawatt demand, building sizes, 24-hour construction, workforce, battery yards or coverage request, and it stated that no fuel would be stored on site, which the application now contradicts. We ask that the applicant send a new, accurate notice and that the citizen review period start again.

4. Scheduling

We respectfully ask that the County:

1. not schedule a hearing until the studies above are complete and posted on the County's Data Centers page, with at least 30 days for public review;
2. hold the hearing in the north county, in the evening, so working residents can attend; and
3. include this letter in the record and the staff report, and give us a written response.

We also ask staff to recommend that the 24-hour construction request be denied under Section 2.51.240.4.b, and that financial assurance be required under Section 9, given the battery yards and the site's location beside the playa.

Thank you for your attention. We want the County's new data center rules to work as intended: careful review based on facts, before a decision is made.

Respectfully,

[Your Name]
Cochise, Arizona