COMMUNITY WATERSHED ALLIANCE

of the San Pedro Valley

Dear P & Z Commissioner:

Re: Conditional Permitting of Solar Farm

We appreciate your efforts to become familiar with this major opportunity coming to Benson.

Developing Solar Energy from the watershed perspective has been on the radar of the Community Watershed Alliance. We are a 501 © 3 promoting collaboration, scientific research and education in the Benson Subwatershed since 2006.

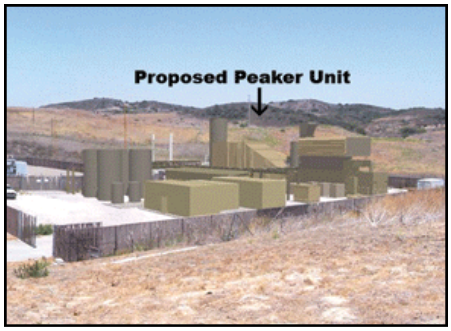
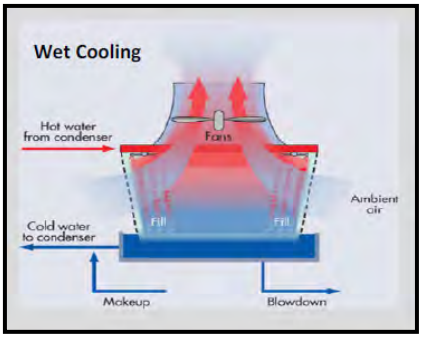
CWA is well aware of the value in developing renewable energy. We wish to encourage the Commission to establish guidelines/ conditions that will provide long term protection to the watershed and residents of the valley.

The level of responsibility given this Commission may be elevated since there is the possibility this project will have limited/ if any review by the Arizona Corporation Commission. Since partners are not requesting Federal Incentives, at first check, it appears the Solar Farm is outside the ACC purview. It also appears that it will be the size of the gas-fired peaker plant that will determine if it comes under the ACC regulatory process.

The decision you are being asked to make on March 6th, has many critical elements. Please take all the time necessary to fully understand the scope of the watershed implications, associated water demands, and land use issues in order to provide the best guidance within your authority.

We would like to respectfully present a list of conditions that include those developed by other communities that have had similar opportunities and associated challenges. Perhaps these suggestions might be tweaked/ adjusted or inspire others that address concerns specific to this proposal.

CONCERN	**SUGGESTION 1**	**SUGGESTION 2**
Project is upslope of portion of San Pedro identified as impaired and is a part of the ADEQ water quality improvement effort called the Total Maximum Daily Load Program. Upland projects contribute to excedences of total maximum loads for sediment. Movement of 700-800,000 yards of dirt with ground cover disturbance presents a major issue for stormwater protection, erosion control, invasive species management if project is abandoned. Who will assume financial responsibility for stormwater protection, erosion control , invasive species management if project is abandoned?	If a ground mounted solar energy system and grounds have been abandoned (meaning not having been in operation for a period of six (6 months) or is defective or is deemed to be unsafe by _____ Building Code Official, the solar energy system and ground stabilization structures shall be required to be repaired by the owner to meet federal, state and local safety standards, or be removed by the property owner with the time period allowed by the _____Building Code Official. If the owner fails to remove or repair the defective or abandoned solar energy system and ground stabilization structures, the City may pursue a legal action to having the system removed and or/repairs made at the owner's expense.	Company is required to post reclamation monies as bond to restore ground cover, control invasive species, stabilize eroding lands, conduct removal of hazardous materials, etc. if project is abandoned. Preferred scenario due to many Solar Companies going bankrupt or not fulfilling financial commitments.

CONCERN	SUGGESTION 1	SUGGESTION 2
Limited information is available regarding the design of the natural gas-peaker plant, cooling technology, hours of operation, emissions - each element has significant resource implications. Gas-fired plants frequently use a combo with steam turbines.  **SAN DIEGO - 48 KW gas-fired peaker plant expected to run 200 hours a year but permitted for 2,400 hours a year. Typical stacks 80' tall, drawing at 50' to accommodate aesthetics.**	Applicant must submit design concept for peaker plant that uses most current industrial standard for dry cooling. Hours of operation are limited so that gas-plant is restricted to only supplementing solar system.  **Larger cooling units use 1 acre foot of water a day - 325,851 gallons or 118,935,615 gallons a year.**	Use industrial standard for hybrid system incorporating air cooling with use of non-potable water – grey water, not contaminated with other toxic substances. Use blowdown reclamation systems – water treatment and filtration systems to take solids out of the blowdown and reduce contaminants at discharge.

CONCERN	SUGGESTION 1	SUGGESTION 2
Assurance of PV System, Panel Height 	Group – or-pole mounted PV solar panels shall not exceed 7' in height when oriented at maximum tilt. Waterless cleaning preferred. **Facility just slightly bigger than two of the proposed phases in Benson - 48 MW facility on 380 acres with 775,000 panels in Boulder City, Nevada.**	
Limited assurance of project integrity	Applicants to provide business profile, project - track record, financial capacity, prospectus and evidence of communication/purchase agreements with utilities for power before construction of peaker plant and installation of phase two panels.	

Respectfully Submitted,

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