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Board of Supervisors
Apache County, AZ

MAY 5, 2026

**CITIZENS' APPEAL TO APACHE COUNTY BOARD OF SUPERVISORS
FOR A MORATORIUM ON RENEWABLE ENERGY PROJECTS**

This moratorium is requested by the undersigned citizens of Apache County, District 3, who are concerned about the current revisions being made to the County's Utility Scale Renewable Energy Ordinance (Ordinance). We are requesting a 120-day moratorium to suspend County receipt of Conditional Use Permit (CUP) applications related to renewable wind, solar and battery storage energy projects in Apache County for the following reasons:

STATUTORY PROVISIONS

1. ARS §11-833 (Standards for enactment of moratorium; land development; limitations; definitions) sets forth the requirements for a County to adopt a moratorium on construction or land development.
2. ARS §11-833, subsection C, authorizes a moratorium if justified by a demonstration of compelling need for "other public facilities" which include police and fire facilities and other essential public facilities.
3. ARS §11-833, subsection I, defines "essential public facilities" to include water resources.
4. ARS §11-833, subsection C(2), authorizes a moratorium on rural land if:
 - a. Existing development ordinances are inadequate to prevent irrevocable public harm from development.
 - b. No other means exist to prevent irrevocable public harm.
5. ARS §11-833, subsection D, authorizes individual landowners to apply for a waiver of the moratorium's applicability to their property on the basis of a development agreement or vested right.

JUSTIFICATION FOR MORATORIUM

The justification for a moratorium is the failure of the existing Ordinance to adequately address the additional impacts on essential police and fire facilities and water resources in Apache County that will result from the construction of wind, solar and battery storage projects. The following concerns should be studied by a qualified independent expert before allowing renewable energy projects to proceed:

A. Greens Peak Communications Facilities are Essential for Public Safety

1. The facilities at Greens Peak are essential public facilities for police and fire and emergency response. There is substantial evidence of radio/radar communications interference caused by wind turbines, especially at the heights proposed in Apache County, which may have a serious adverse impact on all users of the public RF (radio frequency) facilities on Greens Peak, including the following:
 - Police and fire coordination during emergencies

- EMS coordination during rescue operations
- Disaster preparedness for HAM and GMRS (General Mobile Radio Service) operators who provide critical communications during widespread cell phone, Internet, and Wi-Fi outages.
2. It is critical for the County to conduct an Existing Baseline Study and Communications Impacts Analysis of the multiple wind turbines proposed in the vicinity of Greens Peak to determine the impacts they will have on RF communications. These evaluations must be conducted by qualified independent experts in coordination with all users of the essential public facilities on Greens Peak, including federal, state, county and municipal law enforcement and emergency services agencies; public utilities; businesses; and FCC-licensed citizens.
3. Without a thorough analysis of communications impacts, County decision-makers have no clear understanding of the potential harm that nearby wind projects may have on critical daily and emergency communications.
4. Wind turbines must be sited to avoid direct line-of-sight interferences between Greens Peak repeaters, TV Knoll translators and cell/microwave towers, and the agency dispatchers, mobile field units and others that rely on them for the protection and safety of Apache County citizens.

B. Wind, Solar and Battery Storage Projects Will Impact Scarce Water Resources

1. **B**illions of gallons of water will be required for the construction of concrete turbine foundations and their curing, and for road construction and dust control.
2. The State of Arizona and Apache County have been experiencing drought conditions for over 20 years. The primary source of water in Apache County is groundwater (94%) with surface water (6%) making up the remaining supply.¹ Shallow aquifers along the Little Colorado River (LCR), support surface flows and facilitate natural recharge, but the LCR is running at diminished capacity due to drought. Other water sources for Apache County, including creeks, tributaries, lakes and reservoirs, are also at diminished capacity due to drought.
3. Agriculture and ranching represent 77% of the land use in Apache County; both are heavily reliant on water. Irrigation may be adversely impacted this year due to drought.
4. The existing power plants of Apache County are heavily reliant on water for operations.
5. Apache County municipalities are heavily reliant on water for the livelihood of their residents and businesses.
6. Many property owners in southern Apache County rely on shallow wells that may be diminished or depleted by water usage during the construction of wind, solar and battery storage projects.
7. Increased fire risk resulting from drought conditions creates the likelihood of unexpected demands on Apache County water resources.

¹ Arizona Water Factsheet-Apache County; Water Resources Research Center, University of Arizona Cooperative Extension; April 2024.

- 8. Water rights and the allocation of both surface and groundwater resources impact multiple sectors including tribal and non-tribal communities, agriculture and industry, and the impact on these sectors in light of prolonged drought conditions should be studied before considering any large new development projects. Existing water resources and water use rates should be quantified, and realistic projections of future demands on the Coconino Aquifer should be made to avoid its depletion and possible permanent collapse.

OTHER REASONS FOR MORATORIUM

While not specifically authorized by ARS §11-833, there are additional reasons for the County to consider a moratorium. These additional concerns have not been addressed and should be studied simultaneously during the moratorium:

- A. A review of documented health impacts on humans, livestock, wildlife and other animals living near wind turbines. Current and proposed Ordinance setbacks are inadequate for the protection of human health.
- B. The impact on neighboring property values likely to result from industrial scale renewable energy projects.
- C. The impact on businesses that rely on a tourism economy that is dependent on our natural environment.
- D. The geologic, cultural and economic impacts on the Springerville Volcanic Field.

The process for revising the current Ordinance has been driven by non-resident representatives of the renewable energy industry, at the expense of citizens of Apache County. A moratorium would allow citizens to participate in a fair and transparent way.

Date	Signature	Printed Name	Street Address and Town
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See 359 Apache Co. citizen signatures submitted on 5/5/26
to Clerk of the Board.

(continued on following pages)