Monarch Data Center
Planned Unit Development

150 Penrose Lane and 155 Penrose Lane
Lyon County, Nevada

PREPARED BY:

ERM

ON BEHALF OF:

Copia Power
A Carlyle Portfolio Company

DATE
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1. APPLICATION REQUEST

Copia Power DevCo, LLC ("Copia Power" or "Applicant") is seeking a **rezoning from RR-20 to Planned Unit Development** (PUD) for two parcels in Lyon County – 150 Penrose Lane (014-201-07, north, 240 acres) and 155 Penrose Lane (014-201-30, south, 265 acres), totaling approximately 505 acres, also referred to herein as the "Project Site." The Project Site is located approximately 7,000 feet east of the US-95 and Penrose Lane intersection.

The primary purpose of the PUD zoning designation is to permit the development of a proposed data center facility with ancillary uses, including a natural gas plant and battery energy storage system (BESS).

The Project Site was approved for Master Plan amendment from Agriculture to Specific Plan by the Lyon County Board of Commissioners in December 2025. While rezoning to PUD requires additional applicant due diligence and decision from Lyon County, including a number of site-specific details, a regulatory foundation for the Project has been recently supported and approved.

1.1 PROJECT DESCRIPTION

Please see **Appendix A** for a site plan indicating existing and proposed distribution, density, and intensity of land uses, including open space. Refer to **Appendix C** for a series of visual simulations to further demonstrate conceptual built conditions.

The Proposed PUD is a 1,000-megawatt (MW) data center facility (the total anticipated load across a set of buildings comprising the project campus), with ancillary energy generation and energy storage land uses (the "Project"). It is intended that the Project will interconnect with the NV Energy (NVE) electric grid at or near the Walker River Substation complex which is currently under construction and located approximately two miles north of the Project Site.

The Project will also include the following accessory components, which are land uses generally regulated by the Lyon County Land Use and Development Code (the "Code"):

- 500-MW BESS
- Natural gas energy generation system, with up to 500-MWs of capacity, including single-cycle, combined cycle-combustion turbines or reciprocating engines
- Administrative and equipment storage building(s)
- Onsite substation(s)
- Onsite switching station(s)
- Above ground electrical interconnection (to be submitted as a separate Conditional Use Permit application)

In addition to accessory uses listed above, the Project includes various infrastructure elements, which may include but are not limited to:

- Fiber infrastructure
- Backup power generation
- Load lines and communication lines

1.1.1 SITE ACCESS OVERVIEW

The Project Site will be accessed from Sierra Way, located about one mile north of the Project Site. The Project Site is not intended to be accessed from Penrose Lane, which will serve as a secondary emergency entrance/exit only. Proposed access from Sierra Way includes a north-south access road, located just west of the proposed above ground interconnection line (see **Appendix A**). The new access road from Sierra Way is proposed along the west property line of the north adjacent Nevada Department of Wildlife (NDOW) owned land. Alternatively, the new access road may be sited on privately-owned land (under the same ownership as the Project Site), parcels 014-201-32 and 014-201-18. These parcels are located just west of the aforementioned NDOW land. The proposed Sierra Way access road terminates at the northwest corner of 150 Penrose Lane. Additional information on transportation and site access is included below in **Section 3.13** and in the Traffic Impacts Study (TIS) included as **Appendix H**.

1.2 PROJECT JUSTIFICATION

The proposed land use, a data center with ancillary uses, is a compatible and complimentary land use to the planned Walker River Substation complex project. Further, existing and planned infrastructure within the immediate vicinity serves as an appropriate foundation for the Project, which includes the existing Bureau of Land Management (BLM) utility corridor, plans for the regionally significant Greenlink West and Greenlink North transmission line projects, the existing NVE 120kV electric line, and proximity to similar development projects, for example, the, Lux Solar facility, Fort Churchill Gas Plant, Winston Solar and Storage Project, and Homestretch Geothermal Project. While Homestretch Geothermal may not be currently operating, it should be noted that the use was deemed appropriately sited and compatible with its surrounding environment during the time of approval.

According to the Final Routing and Siting Study for the Greenlink West Transmission Project, *"A new Fort Churchill 525/345/230/120 kV Substation will be constructed approximately 1,600 feet west of the existing Fort Churchill 230/120 kV Substation, referred to as the Walker River Substation complex. The proposed substation will also require the construction of one new 525 kV getaway transmission line and three new 345 kV transmission line getaways, and realignment of one existing 230 kV transmission line and six existing 120 kV transmission line getaways."* As indicated by the Study, the Fort Churchill and Walker River Substations are key infrastructure components of the regionally significant Greenlink Transmission Project.[1]

The Project is strategically sited near the planned Walker River Substation Complex. The Walker River Substation Complex, currently under construction, will serve as a key interconnection "hub" for both the Greenlink West and Greenlink North projects where both 525-kV lines will meet. The Greenlink projects are designed to bring renewable energy to the west and to meet large load growth. The Walker River Substation Complex is being constructed to accommodate these new transmission lines, increased capacities, and large load growth.

According to NV Energy, construction on Greenlink recently began. Greenlink West is expected to be in service by May 2027. Greenlink North is expected to be in service by December 2028. The project will also include three 345 kV lines from Yerington, NV, to the Reno, NV, area[2].

[1] Source: Final Routing and Siting Study, Greenlink West Transmission Project, June 30, 2021. Prepared by Power Engineers for NV Energy.
[2] Source: www.nvenergy.com/cleanenergy/greenlink-nevada.

The Greenlink development will likely serve as a significant driver for future investment into local communities. As such, while the Project Site is currently zoned RR-20, low-intensity complimentary land uses such as a data center with ancillary land uses are appropriate and compatible with the overall vision for the region. Further, the Project will also maintain the delicate balance between new development and economic growth and rural/agricultural preservation. See **Appendix D** for a Land Use Compatibility Analysis map of similar energy projects that are either existing or approved/future in the vicinity to demonstrate further compliance and land use compatibility.

1.3 ECONOMIC BENEFITS

Copia Power expects to engage with Lyon County to discuss a community benefits package commensurate with the nature and scale of the proposed Project. The details of this benefits package will be discussed with relevant stakeholders as information is finalized.

Additionally, Copia Power commissioned an independent third-party economic analysis of the proposed Monarch Data Center Project, conducted by the Northern Nevada Development Authority (NNDA). This section summarizes key findings and results from the economic analysis conducted by NNDA. Please note that these findings are estimates based on a variety of assumptions. Though, estimates derive from various credible sources, including current tax policies, available economic data, and existing economic structure of the Lyon County region.

According to the analyses, it is estimated that the Project will result in the following economic benefits to Lyon County over the anticipated 20-year life cycle:

- **Total Investment and Economic Impact**
  - $12 billion initial capital investment
  - Over $4 billion spent on construction labor related expenses
  - An additional $24 billion in equipment replacement and upgrades are anticipated over the life of the Project
- **Employment Impacts**
  - At least 150 direct permanent jobs
  - At least 100 indirect and induced jobs in the local economy
  - Over 2,000 annual construction jobs supported
  - Over $100 million total payroll impact
- **Local Government (County and School and Special Districts) Tax Revenue Impacts**
  - Over $1.5 billion in real and personal property tax revenues
  - Approximately $250 million in sales tax revenues

2. LYON COUNTY DEVELOPMENT CODE, CHAPTER 349, PLANNED UNIT DEVELOPMENT (PUD)

2.1 SECTION 15.349.01: PURPOSE

According to Chapter 349 of the Lyon County, Nevada Development Code, the overarching purpose and intent of a planned unit development (PUD) is to *"…provide an overall planning*

and design approach for a single use development or a development incorporating a mix of uses. PUD allows for deviation from a strict application of dimensional and use limitations of the zoning district or districts in order to provide flexibility for landowners to creatively plan for the overall development of their land to achieve a more desirable environment than would be possible through strict application of the standard requirements of the zoning district."

It is understood that Chapter 349 is primarily written for residential and/or commercial mixed-use development. While the proposed land use is not residential or commercial in nature, this proposal meets the general purpose and intent for PUDs in Lyon County for the following reasons:

- The proposed use, a data center with ancillary facilities (see Section 1.1 above), will incorporate a mix of uses that cannot be simply categorized as principal and accessory through conventional zoning mechanisms as required by the RR-20 Zoning District.
- The proposal includes consolidation of land uses, notably a defined data center campus and supporting infrastructure, that reflects condensed development patterns and will not serve as a catalyst for further sprawl into the County's agricultural areas.
- The Project will include BESS, which will require deviation from setback requirements as adopted by the Lyon County Board of Commissioners in June 2025.
- The Project will incorporate modern technology and land uses that are not specifically regulated by the Lyon County Development Code. Therefore, the Project includes special circumstances that are not addressed or provided for through conventional zoning district regulations.
- The Project directly supports flexibility in land uses and creative planning, considering the mix of onsite uses, consolidation of uses and structures, as well as supporting emerging technologies and economic diversification in Lyon County.

2.2 SECTION 15.349.02: APPLICABILITY

The Project Site is within the Rural Character District designation, as per the 2020 Master Plan. As noted above (Section 1.1), the Project Site has been approved for a Master Plan amendment from Agriculture to Specific Plan in December 2025. Both parcels that comprise the Project Site are currently zoned RR-20. The Lyon County Development Code permits PUDs in both the Suburban and Rural Character Districts (Section 15.349.02).

Chapter 349 of the Development Code requires PUDs to be designed and developed in harmony with the surrounding environment. The Project aligns with this general requirement as demonstrated throughout this narrative.

2.3 SECTION 15.349.03: STANDARDS AND CRITERIA

Table 2 below includes an analysis of Lyon County's PUD Standards and Criteria with a corresponding explanation for how the Project complies with each of these standards.

TABLE 2: DEMONSTRATION OF COMPLIANCE WITH PUD STANDARDS AND CRITERIA

Standards and Criteria	Demonstration of Compliance
Proposed Uses: The use (or uses) proposed is (are) consistent with the goals and	• **Goal C 2: Rural Character, Policy C 2.1 - Rural Land Uses and structure**

Standards and Criteria	Demonstration of Compliance
policies of the Lyon County Comprehensive Master Plan.	○ The proposed use does not require a land character designation change from the current Rural Character designation. Existing and surrounding rural land uses will prevail. • **Goal LU 1: Orderly Growth Patterns, Policy LU 1.4** ○ The Land Use and Development Code supports several compatible uses in the Rural Character designation and rural residential zoning districts, which comprises the surrounding properties and the Project Site's underlying zoning. The PUD will result in similar uses already permitted in the RR-20 District (e.g., energy production and distribution) without setting an unnecessary or incompatible precedent. • **Goal LU 3: Diverse Economy, Policy LU 3.1 - Diverse Economic Base** ○ The Project serves as a prime opportunity to bring jobs, both temporary and long-term, to Lyon County. The Project also responds to the needs of a growing industry, while existing (and planned) energy infrastructure sets a foundation for complimentary land uses. While the Project Site is not located within the County's primary commercial or industrial centers, it is still a reasonable commute distance for construction and long-term staff. • **Goal NR 1: Public Access, Policy NR 1.1** ○ The Project is located adjacent to the Mason Valley Wildlife Management Area (north and east) but does not close off any key access points to the area or prohibit or diminish the use of any recreation amenities. • **Goal FS 5: Utility Corridors, Policy FS 5.1** ○ The Development Code outlines approval mechanisms and processes for power distribution lines, substations, and other energy production/distribution land uses. The PUD is reflective of a working partnership between Copia Power and Lyon County residents, staff, and decision-makers to ensure a mutually beneficial development pattern and aesthetic environment. • **Goal FS 5: Utility Corridors, Policy FS 5.2** ○ The Project aligns with this goal in that the PUD will not disrupt surrounding land use patterns and incorporates interconnection within proximity to the designated utility corridor. The proposed interconnection is consistent with existing land uses and regional energy infrastructure plans. ○ It is understood that the interconnection route, as proposed, will require a Conditional Use Permit from Lyon County. • **Goal FS 5: Utility Corridors, Policy FS 5.3**

Standards and Criteria	Demonstration of Compliance
	○ The Project enhances and is consistent with existing and planned infrastructure and utility projects. The Project compliments the Walker River Substation project, Winston Solar project, as well as the regionally significant Greenlink Transmission Project. ○ The Project is located within a rural portion of Lyon County. The Project is not sited within proximity of existing residential neighborhoods, community gathering spaces, or commercial nodes. These conditions support land use and aesthetic consistency considering little disruption to frequently visited areas of Lyon County or community hubs. Additionally, due to the sparse population within the immediate vicinity, the Project is unlikely to create incompatible conditions that could be observed from major County thoroughfares.
Site Area: The minimum site area required for a proposed PUD is five (5) acres. The tract or tracts of land included in a proposed PUD must be in a single ownership or under the development control of a joint application of owners or authorized agents of the property involved.	The Project Site is a total of approximately 505 acres. Of that, approximately 20-40% will be undeveloped open space. Therefore, the PUD site is compliant with the 5-acre minimum requirement. Both parcels are under Copia Power's control.
Design: The PUD will comply with the Lyon County Design Criteria and Improvement Standards and specifications contained in appendix B on file in the County.	Lyon County staff have previously stated that Lyon County has not adopted any Appendix B regulations. As such, this requirement is not applicable. However, the Project design and site layout complies with applicable Lyon County standards, in terms of land use consistency, aesthetic compatibility, bulk requirements for principal structures, conservation of natural features, and other elements.
Density: The allowable residential density shall be established for the subject property, using the net density acreage as defined in chapter 1200 of this title, appendix A.	Not applicable. The Project does not include residential components.
Bulk Requirements: Building and parking area setbacks, minimum lot area, lot coverage and building height must conform to the requirements of the equivalent zoning district or the existing underlying zoning for a majority of the PUD unless deviations from those underlying zoning	• Project Site Bulk Conditions: ○ Approximately 505 total acres ○ 60-80% lot coverage • Data Center Bulk Conditions: ○ East setback: Minimum 30 feet with additional setback depending on building height (see below); ○ West setback: Minimum 30 feet with additional setback depending on building height (see below); ○ Minimum 30-foot rear yard setback ○ Per Section 15.314.01.F.2., an additional 2 feet of setback for every 1 foot of building height in excess

Standards and Criteria	Demonstration of Compliance
development standards are proposed, considered and approved as a part of the review process. Any such deviation(s) must be justified by the applicant by addressing the allowable modifications contained in chapters 340 through 349 of this title where appropriate.	of 35 feet will be accommodated in final design and building permits. The enclosed Site Plan (**Appendix A**) includes a 150-foot and 175-foot on the east and west boundaries, respectively, to accommodate an up to 95-foot building height. ▪ *Note:* Actual building height may vary, depending on the final building design and Issue For Construction civil designs prior to ministerial permitting. Buildings may be constructed as single-story or two-story. Regardless, data center buildings will not exceed more than 4.6M square feet, as approved by the Specific Plan. All applicable conditions of the Specific Plan will be adhered to. • Natural Gas Plant Bulk Conditions: o Minimum 30-foot rear yard setback o Minimum 30-foot side yard setback o Minimum 30-foot front yard setback • BESS Bulk Conditions: o Minimum 30-foot rear yard setback o Minimum 30-foot side yard setback o Minimum 30-foot front yard setback o Refer to **Appendix Q**, BESS Setback Exhibit, for a demonstration of the proposed setback distance between the proposed BESS area from the nearest residential land use.
Commercial Design: Commercial building placement and architectural design shall conform to the intent of chapter 360 of this title, commercial design standards.	Not applicable. The Project is not a commercial building or land use.
Residential Design: Multi-family housing placement and design shall conform to the intent of chapter 348, "Multi-Family Residential Design Standards", of this title.	Not applicable. The Project does not include residential components.
Parking: Parking shall be provided as required by chapter 401 of this title, parking and loading. Further reductions in the amount of parking to be provided may be proposed by the applicant but shall be approved only if they meet the exceptions criteria of subsection M3 of this section.	The Lyon County Code does not include parking requirements specific to data centers. Table 15.401-2 of the Code includes parking requirements for warehousing, which is the most similar land use. The Code requires 1 space per every 1,500 square feet (Table 15.401-2). As such, the Code would require over 3,000 parking spaces, if the requirements for warehousing are enforced. Copia Power commissioned a Parking Study, developed by engineers at Kimley-Horn. Results of the Parking Study can be found in **Appendix P**. Section M.3.b.1 permits deviations for parking for uses that are "permanent in nature and has low demand for off-street parking." The proposed data center will not require robust onsite staffing and will be largely self-sustaining. Considering the Development Code does not include

Standards and Criteria	Demonstration of Compliance
	provisions for data centers, the Project requires minimal onsite staffing, provides no public access, and requires minimal onsite visits, minimal parking is proposed. Based on the results presented in **Appendix P**, the Project will include approximately 920 parking spaces, intended to accommodate future onsite staffing and/or maintenance personnel.
Open Space: The minimum amount of area to be designated and preserved as common open space in any planned unit development shall be twenty percent (20%).	The Project proposes 20-40% open space. This is compliant with PUD requirements of Chapter 349.
Connectivity: Planned unit developments shall provide vehicular, bicycle, pedestrian or equestrian connections to adjacent and nearby residential areas, transit stops, neighborhood activity centers and other neighborhood facilities	The proposed PUD is located within the County's Rural Character designation and therefore absent of existing sidewalks or bicycle infrastructure. This results in a lack of need for sidewalk or bicycle connectivity. Further, while the Project is situated near a few rural residential homes, it is not located within proximity to any neighborhoods, activity centers, transit stops, or community gathering spaces. Moreover, the TIS (**Appendix H**) includes recommendations for enhanced vehicular conditions. The Project considers traffic patterns and vehicular access in both the TIS (**Appendix H**) and Site Plans (**Appendix A**). Discussion with Lyon County resulted in enhanced vehicular patterns by proposing primary site access from Sierra Way, rather than Penrose Lane. Refer to **Appendix H** for more traffic details. Considering the Project's location, land use type, lack of public access, and surrounding rural environment, enhanced pedestrian and bicycle connectivity are not proposed as component of the proposed PUD. Existing equestrian activities and opportunities that may occur on the adjacent MVWMA will remain unchanged.
Employment Or Commercial Designations: Planned unit development in areas designated employment or commercial on the Lyon County Comprehensive Master Plan Map may allow mixed industrial, commercial, and residential uses.	Not applicable. The Project is not designated as Employment or Commercial, per the Lyon County Master Plan.
Buffers: Planned unit developments shall establish adequate buffer zones between dissimilar uses within the development and between	The Project incorporates a minimum 30-foot side yard buffer along the west property line. The buffer consists of native vegetation and includes a mixture of trees and shrubs. The remainder of the Project Site will consist of native landscape, consistent with current site conditions.

Standards and Criteria	Demonstration of Compliance
dissimilar uses and/or densities exterior to the planned unit development. Special design considerations such as height controls, density controls, architectural modifications, and landscaping buffers shall be incorporated in any portion of the development which adjoins a previously approved land use or division of land.	See **Appendix A**, Site Plans, for further detail on proposed landscaping and screening details. Considering the Project location in a rural area of Lyon County with lack of neighbors or public establishments, as well as to preserve water resources, the PUD application package includes a high-level Landscaping Plan. The high-level Landscaping Plan is intended to maintain existing open space and natural area conditions. Further, given the Project's remote location, it is not anticipated that robust site screening measures will be necessary, as the Project is not visible from County throughfares, suburban areas, or neighborhoods. Further, the Project's architectural design intentionally considers Lyon County's unique rural landscape and surrounding aesthetic character. Proposed buildings will be comprised of a natural color, consistent with its surroundings. Refer to **Appendix G,** Building Elevations, for further detail.
The development would provide for the implementation of a master plan goal in a significant manner (e.g., provides that a quarter of the proposed residential units are to be reserved to address the County's need for affordable workforce housing).	See Master Plan goals and policy analysis above for demonstration of compliance.

3. ADDITIONAL PROJECT DETAILS

3.1 EXISTING LAND USE SUMMARY

Both existing land uses and planned land uses consist of agriculture or farmland. However, it should be noted that the Project Site is currently unfarmed and has not been utilized for agricultural purposes for several years. The Project Site is no longer viable for farming activities due to increased costs to maintain it as farmland, poor soil quality (see **Appendix K**, Soil Report), and substantial water demand that far outweighs return.

Current use of the site includes unimproved vacant land without any structures or homes. The 2020 Master Plan designates both parcels comprising the Project Site as Specific Plan (approved December 2025) within the Rural Character Designation. As previously noted, the Lyon County Development Code does not include provisions specific to data centers or data center development.

The proposed PUD is consistent with the goals of the 2020 Master Plan, as described in **Table 2** above. Further, the Lyon County Land Use and Development Code supports some light industrial land uses (e.g., warehousing, research, light industrial, distribution, etc.) in the Rural Character designation, as noted in the District Purpose described Section 15.314.01. The

Project will result in use of land and built conditions that are supported by both the Master Plan and the Lyon County Development Code for the following reasons:

- The proposed use is complimentary to the Rural Character designation.
- The use is consistent with existing and planned energy infrastructure and other regionally significant energy projects.
- The Project supports economic growth and will result in substantial tax revenue to Lyon County and associated community programming.
- The Project Site is situated over 1 mile from major throughfares, commercial spaces, residential neighborhoods, and community gathering spaces. Thus, the Project will not create substantial visual impacts to the Lyon County community.
- Proposed bulk conditions and placement standards are compliant with Chapter 311 (Rural Residential Zoning Districts) and Chapter 349 (PUDs), as applicable.

TABLE 3: EXISTING AND PLANNED LAND USES

Parcel Address	Existing Land Use	Zoning	Planned Land Use/Character Designation (2020 Master Plan)
150 Penrose Lane	Unimproved agriculture	RR-20	Specific Plan/Rural Character
155 Penrose Lane	Unimproved agriculture	RR-20	Specific Plan/Rural Character

3.2 SURROUNDING LAND USE ANALYSIS

Historically, onsite existing land uses include agricultural operations. Though, it is important to note that adjacent land uses would likely experience limited impacts from the proposed data center and ancillary uses, considering the area's low population and lack of surrounding structures.

Further, the data center will not significantly impact surrounding properties in terms of availability of farmland or viability of agricultural land, or require excessive water usage, more than what is typically required for regular farming operations. Additionally, the utilities required to support the Project, once operational, are right sized for the proposed land use in terms of the lack of municipal infrastructure needed, the complimentary regional Greenlink and Walker River Substation projects, and secured not-to-exceed water rights. Utility needs and usage are described further in this section below.

As previously noted, the Project is not sited within areas of the County with high population or high-density development, though visual impacts to nearby residents were analyzed. The results of a visual simulation are included in **Appendix C**. Refer to **Appendix O**, Site Photographs, for further demonstration of existing site conditions.

Regarding potential impacts on the adjacent MVWMA, Copia Power has engaged with NDOW early in the planning process for the Project. As a component of the Project and discussion with NDOW, Copia Power intends to conduct several onsite surveys including a small mammal survey, acoustic bat survey, reptile survey, burrowing owl survey, raptor nest survey, and avian point count survey. Results of these surveys will be coordinated with NDOW to determine further action. However, it should be noted that proposed data center operations will not

impact the availability or viability of hunting or other recreational activities in the MVWMA. **Table 4** below includes an existing land use analysis of properties surrounding the Project Site.

TABLE 4: SURROUNDING LAND USE ANALYSIS

Adjacent Parcel Direction	Existing Land Use	Zoning	Planned Land Use (2020 Master Plan)
North	Mason Valley Wildlife Area	RR-20	Public Land
South	Agriculture	RR-20	Agriculture
West	Rural/single-family Residential Agriculture	RR-20	Rural Residential Agriculture
East	Mason Valley Wildlife Area	RR-20	Public Land (includes transmission corridor)

Moreover, as described in Section 1.2, Project Justification, nearby surrounding land uses that serve as complimentary to the Project include the Walker River Substation Complex, Greenlink transmission line, BLM utility corridor, solar and BESS projects, and geothermal projects. Refer to **Appendix D**, Land Use Compatibility Analysis, for a spatial demonstration of the Project's compatibility with surrounding land uses.

3.3 ZONING ANALYSIS AND PROPOSED BUILT CONDITIONS

The Applicant developed this application narrative to demonstrate compliance with applicable Lyon County standards. The proposed primary and ancillary land uses are not clearly addressed in Lyon County's zoning policies. As such, the PUD process is intended to support creative land uses and associated site design while offering opportunities to deviate from RR-20 District zoning specifications (e.g., setbacks and onsite uses) with input from the Applicant, the County, and public stakeholders during the PUD development and review process.

Refer to Table 5 below for further information regarding proposed built conditions, including setbacks, open space calculations, parking, landscaping, lighting, and other features.

3.4 WATER

The data center will prioritize the use of an air-cooled, closed-loop cooling system that removes heat using ambient air rather than evaporating water. This approach balances water use, energy efficiency and spatial efficiency; any water required for cooling will be sourced from privately held water rights on site. Water usage for the cooling activities will be limited primarily to cleaning the condenser coils and otherwise will not be consumed daily.

Other sources of water consumption include domestic, potable and maintenance activities, gas plant operation, landscaping and firewater storage[3]. It is anticipated that water consumption,

[3] Initial discussions with fire department suggest that a 1 million-gallon water storage tank will likely be required.

including that required for the data center cooling and other uses mentioned above, would be below 100 acre-feet/year across all use types.

Water rights acquisition and any modifications to the groundwater well sourcing water for the Project are subject to approval by the Nevada State Engineer. Any modifications to Walker River Irrigation District (WRID)-maintained drains or ditches within the Site will be coordinated closely with WRID to maintain adequate flood control and water conveyance. Based on initial conversations with the landowner, drains providing water to the Site can be decommissioned given the change in proposed use for the land. The single carrier ditch running north/south within parcel 014-201-07 will be re-routed to the east of the property as shown on the Grading and Drainage Plan (**Appendix B**). This ditch will continue to provide water to the farmed portion of parcel 014-312-01 (MVWMA).

The Project Site is comprised of previously farmed land which has been consistently unproductive due to its poor soil quality. According to the landowner, despite continued effort, crop yields have remained low, making the ground unsustainable for long-term agricultural use; resulting in the Site not being actively farmed for several years. In addition, agriculture is highly water-intensive, and the significant water demand for agricultural uses far outweighs the returns from this unproductive land. By shifting the Project Site from agricultural uses, water usage will be substantially reduced. Agricultural production has become less viable to continue operating over time as costs outweigh revenue. The Project does not diminish active farmland in Lyon County, considering that the Project Site cannot yield high value crops and farming has been increasingly difficult and unproductive.

3.5 WASTEWATER

Wastewater from operations will be disposed of via either septic or an on-site treatment facility subject to further analysis of geotechnical conditions. If treatment is provided, any byproducts (e.g., sludge) will be removed from the site in accordance with relevant regulations.

3.6 SEWER

The Project will not require extensions or hookup to the municipal sewer system. The Project Site is not within an existing utility service territory for sewer. Any sewer needs would be serviced independently via an onsite septic system or other means.

3.7 POWER

The Project will interconnect at or near the expanded Walker River Substation complex (525/345/230/120 kV), located about two miles north of the Project Site. The proposed gen-tie route to the Substation is anticipated to traverse north-south, along the western portion of NDOW owned land, west of the designated utility corridor, as noted in the Lyon County Master Plan. Anticipated energy consumption will be allocated by Nevada Energy based on a load study that considers available energy resources, potential impacts to the electric grid and upgrades that may be needed to mitigate impacts. The data center energy usage and rates paid for energy will include all required upgrade costs associated with serving its load, so that energy rates for other customers are not impacted. Copia Power is also developing energy generation on-site and elsewhere on the electric system to help power the data center directly.

3.8 STORM DRAINAGE

The Project will be designed to keep stormwater drainage onsite. Refer to **Appendix A**, Site Plans, for further information on proposed storm drainage conditions. According to the site plan, the Project proposes adequate stormwater retention/detention basins to mitigate hydrology impacts per County requirements.

3.9 NATURAL GAS

The proposed natural gas energy generation system will provide up to 500 MW of capacity using either combined-cycle, single-cycle combustion turbines or reciprocating engines. The proposed natural gas plant will require additional state level permitting, which Copia Power is in the process of obtaining. It is understood that the natural gas facility will not be constructed or operational until applicable permits, reviews, and approvals have been acquired. The natural gas supply to the project is anticipated to come from a new lateral line connecting existing natural gas pipelines in the region, either approximately three miles north or five miles west of the project site. This new lateral pipeline connecting to existing pipelines will be permitted at a future time in coordination with the pipeline company.

3.10 BESS MONITORING, DETECTION, AND EMERGENCY RESPONSE

During public comment and outreach through the Specific Plan process, as well as from Lyon County staff and decision-makers, concerns were raised regarding the safety and reliability of BESS equipment. Copia Power is committed to utilizing modern BESS technologies that result in safe, reliable, and compliant conditions.

Once operational, the BESS will be monitored 24/7 by a remote-operations control center (ROCC). The Project will be equipped with a battery management system (BMS), informing automated systems and personnel through supervisory control and data acquisition (SCADA) systems. The BMS can disconnect the battery from the grid under certain conditions, as per the control system design. The system is equipped to detect anomalies and ensure appropriate personnel are notified in response to an unlikely emergency condition. As needed, controls are designed to allow isolated modules, individual containers, or the full system to be shut down remotely. In addition, each BESS container is equipped with:

- Heat detectors
- Smoke detectors
- Combustible gas detectors

If any of the above detectors are triggered, the impacted component of the system will be shut off and the Fire Alarm Control Panel (FACP) will send signals to the central station associated with the FACP monitoring company and/or the ROCC or other appropriate entity in order to initiate the appropriate internal response. Alarms requiring dispatch of the local fire department will immediately be relayed to the local fire department dispatch station. Copia Power understands that the area is remote and that emergency response times can vary and therefore will design the facilities with appropriate onsite emergency water storage and access and will establish a coordinated emergency response plan with the local fire department.

A detailed Emergency Response Plan (ERP) will be designed and implemented prior to the receipt of building permits for the project. At this stage of project development, a specific ERP cannot be developed because the specific technology has not yet been finalized. Technology selection typically occurs approximately one year before deliveries, which follows industry

standard procurement practices. Once the specific technology and equipment vendors are selected for the project, the ERP will be designed specifically to those selections, and prepared in conjunction with local first responders, ensuring the most effective and appropriate emergency response protocols. Safety training for first responders will also be provided prior to operations.

3.11 DEVELOPMENT PHASING

The Project will consist of a data center supported by onsite natural gas energy generation and BESS ancillary facilities that will be constructed in a general phased approach. Development phases are largely dependent on factors such as utility infrastructure availability, upgrades and schedule. A significant driver of the Project includes the completion of the Walker River Substation complex and Greenlink transmission infrastructure, which serve as the primary catalysts for the Project. The Project is anticipated to be fully constructed within 3-4 years. Though, this schedule is subject to change, due to ongoing coordination with NV Energy and timeline(s) for substation improvements.

3.12 PUBLIC ENGAGEMENT SUMMARY

Copia Power has initiated early outreach to local leaders, neighboring landowners, and community members. Public engagement activities, to date, include the following:

- Local Collaboration
    - Two (2) community meetings
    - Community feedback received and incorporated into modified site access plans
    - Public education material on project water use and access
    - Delivered project overview presentation to the Northern Paiute/Yerington Paiute Tribe
    - Sponsorship of the local Boys and Girls Club
- Local Support:
    - The City of Yerington
    - The Yerington Chamber of Commerce
    - The Office of Nevada Governor Lombardo
    - The Northern Nevada Development Authority
    - The Boys and Girls Club of Mason Valley
    - South Lyon Medical Center
    - And a cohort of local community members collaborating to share project benefits and facts

3.13 TRANSPORTATION

3.13.1 SITE ACCESS

The project would require vehicular access during construction, and during operation and maintenance of the facility. An existing public road, Sierra Way, will provide access to the project site from US-95A. A proposed 2 lane access road will provide direct access to the

project site from Sierra Way. The access will be used to accommodate equipment deliveries, the construction workforce, and ultimately, the operational needs of the project. Construction traffic, which primarily consists of construction workers and truck deliveries, will necessitate traffic management at the intersections of US-95A and Sierra Way, US-95A and SR-339, and US-95A and Bowman Lane.

The project has completed a Traffic Impact Study (TIS) that has been reviewed by the Nevada Department of Transportation (NDOT). The study evaluated the following three scenarios:

- **Construction Scenario 1:** Analyzing the traffic impact generated by the construction of the Monarch Data Center with the distribution of construction traffic using Sierra Way and Bowman Lane as access to the project site.
- **Construction Scenario 2:** Analyzing the traffic impact generated by the construction of the Monarch Data Center with the distribution of construction traffic using Sierra Way as the only access to the project site.
- **Typical Operations:** Analyzing the traffic impact generated by the typical operations after construction of the Monarch Data Center is complete.

The scenarios are considered conservative, assuming that the peak project traffic will occur in the same peak hour as the surrounding road network. The TIS identified expected mitigation measures likely to be required for the intersections analyzed. The project is committed to facilitating the identified improvements for the US-95A and Sierra Way, US-95A and SR-339, and US-95A and Bowman Lane intersections, in conjunction with other projects contributing to the need for off-site traffic improvements. A Reimbursement Agreement or Cost Sharing Agreement with other projects and the County, if required, would be finalized to the satisfaction of Lyon County, consistent with applicable development code provisions and state statute, prior to issuance of construction permits for the project.

3.13.2 NDOT REQUIREMENTS

The TIS mentioned above determined the following infrastructure improvements to mitigate impacts from the Monarch Data Center project:

1. US-95A and Sierra Way
    a. Install a temporary signal during the construction period for both Construction Scenario 1 and 2. Once the construction phase of the project is completed, the signal is not expected to be warranted.
    b. Install a northbound right turn lane per NDOT's Access Management System and Standards (AMSS).
    c. Install a southbound left turn lane per NDOT's AMSS.
    d. Install a westbound left turn lane per NDOT's AMSS.
2. US-95A and SR-339
    a. Install a temporary signal during the construction period for both Construction Scenario 1 and 2. Once the construction phase of the project is completed, the signal is not expected to be warranted.
    b. Install a southbound left turn lane per NDOT's AMSS.
3. US-95A and Bowman Lane

a. Install a temporary signal during the construction period for only Construction Scenario 1. Once the construction phase of the project is completed, the signal is not expected to be warranted

4. Install Signing and Striping per NDOT and MUTCD standards

The Monarch Data Center project is committed to making the necessary improvements to mitigate any significant traffic impacts of the project.

3.13.3 OTHER TRAFFIC-RELATED COMMITMENTS

Further, guidance from Lyon County Planning Department staff, the Lyon County Planning Commission, and the Lyon County Board of Commissioners, indicated that coordination with other local proposed new development projects on construction of a new passing lane up Wabuska Hill, on Highway 95, may be required for PUD approval. This is due to several proposed new development projects with similar construction timelines within the Project's vicinity.

As part of this Project, Copia Power is committed to meaningfully participating in the planning and providing commensurate financial support of recommended improvements specifically for the US 95/Sierra Way intersection. Copia Power will execute a formal Reimbursement Agreement or a Cost Sharing Agreement, as applicable, with other development projects that have been determined to affect NDOT and local roadways, necessitating off-site improvements.

Before the issuance of construction permits for the Project, agreements facilitating all necessary improvements to mitigate traffic impacts in the area will be finalized, consistent with Lyon County Code and State statute or otherwise in a condition acceptable to Lyon County. Ultimately, the implementation of these improvements is expected to yield significant long-term benefits for the residents of Lyon County, by promoting safer and more efficient transportation options for the community as a whole. By proactively addressing these issues, Copia Power intends to foster a collaborative approach to development that prioritizes the needs of local residents while supporting sustainable growth in the region.

4. SECTION 15.349.07: APPLICATION FOR TENTATIVE APPROVAL

This Section of the Lyon County Development Code lists documentation requirements for Tentative PUD Approval. **Table 5** below includes the list of required supporting documentation and demonstration of compliance from Copia Power.

TABLE 5: DEMONSTRATION OF COMPLIANCE WITH APPLICATION REQUIREMENTS FOR TENTATIVE APPROVAL

Application Requirements	Demonstration of Project Compliance
A narrative addressing the standards and criteria established in sections 15.349.01, 15.349.02 and subsections 15.349.03A thru K of this chapter, including documentation and justification for any exceptions requested.	This document, the PUD Application Narrative, complies with this requirement. Refer to Sections 1, 2, and 3 above.
A statement of proposed density. The allowable density for a planned unit development shall be compatible with the	The proposed Project is not a residential project. Therefore, density requirements are not applicable (see **Appendix N** for the Not

Application Requirements	Demonstration of Project Compliance
Lyon County Comprehensive Master Plan and any applicable community plan. Where an increase in the allowable density is proposed the applicant shall provide a detailed justification addressing the criteria for exception to density outlined in section 15.349.03 of this chapter.	Applicable Letter). However, the Project site plans, included as **Appendix A**, demonstrate compliance with applicable site development standards, including open space.
A site analysis drawn at 1:20 scale	The corresponding Site Analysis, **Appendix E**, is not drawn at a 1:20 scale, due to the total area of the Project Site. Correspondence with Lyon County Planning Department staff confirmed that the proposed scale (1:400 feet) is acceptable to achieve compliance with this requirement. Refer to **Appendix E,** Site Analysis, includes the following items: • A vicinity map (see **Appendix M**) showing the location of the property in relation to adjacent properties, roads, pedestrian and bikeways, transit stops, utility lines and any easements on and across the property • The parcel boundaries, dimensions and gross area • Contour lines at two-foot (2') intervals • The drainage patterns and drainage courses and water courses (including ditches) on the site and on adjacent parcels • Portions of the site within any Flood Hazard Zone, including a figure giving the area and percentage of the site therein • Critical wildlife habitat or natural heritage sites • Significant site features, including areas with unique views, streams, and stream corridors, significant rock outcrops, and similar significant physical site features • The location, size, and variety of trees having a six inch (6") or greater caliper at five feet (5') above ground or, where the site is heavily vegetated, an aerial photograph at the same scale as the site analysis and a drawing showing the location, size, and variety of only the vegetation that will be affected by the proposed development. • Identification information including the name, address, and phone number of the owner, developer, and project designer • A north arrow and the scale.
A geotechnical investigation report which shows the following: slope stability studies, on-site site grading, cutting and filling; structural foundation requirements; surface and subsurface drainage recommendations;	Refer to **Appendix F**, Geotechnical Report. Coordination with Lyon County Planning Department staff have confirmed that a

Application Requirements	Demonstration of Project Compliance
erosion vulnerability; building or grading limitations, including top of slope offsets and areas restricted for site grading; recommendations for construction of streets, utilities, and structures of the site; and identification of any portions of the site requiring further evaluation by a geotechnical or structural engineer. Unless the Director determines that a geotechnical investigation is warranted due to site-specific characteristics	desktop Geotechnical Report is acceptable for this submittal.

A site plan, drawn at the same scale as the site analysis.	Refer to **Appendix A**, Site Plans. Site Plans indicate the following required elements:
	• The applicant's entire property and the surrounding property to a distance sufficient to determine the relationship between the applicant's property and proposed development and adjacent property and development
	• Boundary lines and dimensions for the perimeter of the property and approximate dimensions for all proposed lot lines
	• Section lines, corners, and monuments
	• Identification information, including the name, address, and phone number of the owner, developer, and project designer
	• The scale and north arrow
	• The location, dimensions and names of all:
	  ○ Existing and platted streets and other public ways and easements on adjacent property and on the site,
	  ○ Proposed streets or other public ways, easements on the site and on adjoining property
	• The location, dimensions, and setback distances of all:
	  ○ Existing structures, improvements, utility, and drainage facilities on adjoining properties
	  ○ Existing structures, improvements, utility and drainage facilities to remain on the site
	  ○ Proposed structures and improvements and conceptual plans for utilities, fire suppression and drainage facilities on the site
	• The location and dimensions of:
	  ○ The entrances and exits to the site
	  ○ The parking and circulation areas
	  ○ Pedestrian and bicycle circulation patterns (not applicable)
	  ○ On-site outdoor recreation spaces and common areas (not applicable)
	  ○ Above-ground utilities

Application Requirements	Demonstration of Project Compliance
	• The location of areas to be landscaped • The location and type of street lighting • The orientation of structures, except single-family detached structures and duplexes • The location of group mail boxes (not applicable)
Preliminary architectural drawings including proposed building elevations, sections, and floor plans, except for detached single-family and duplex dwelling units	Refer to **Appendix G** for proposed Building Elevations.
A preliminary grading and drainage plan including written statements and descriptions as necessary, at the same scale as the site analysis	Refer to **Appendix B** for proposed preliminary Grading and Drainage Plan that includes the following required elements: • The location and extent to which grading will take place indicating general contour lines, slope ratios, and slope stabilization proposals • A statement from a registered engineer supported by factual data that all drainage, both upstream and on the site, can be accommodated, and the amount and rate of run-off leaving the site is minimized • A plan, where on-site detention is not feasible, which identifies and mitigates any off-site adverse effects resulting from increased runoff; the plan shall be prepared by a registered engineer • Identification information, including the name and address of the owner, developer, project designer, and the project engineer
A conceptual landscape plan, drawn at the same scale as the site plan.	Refer to **Appendix A**, Site Plans, that includes a Landscape Plan. Landscape Plan elements include: • The conceptual location of the underground irrigation system or hose bibs (a general description of maintenance of landscaped areas may be submitted where no irrigation system is proposed) • The location and height of fences and other buffering or screening materials • The location, size, and species of the existing and proposed plant materials • The location, size, and variety of the trees to be removed.
A map showing how proposed street, sidewalks, bike routes and bike ways and pedestrian connections within the proposed planned unit development may be extended onto adjoining undeveloped properties so	Refer to **Appendix A**, Site Plans, for more information on streets and proposed site access. Considering the Project is located in a remote area of Lyon County, with lack of commercial activities, sidewalks, trails,

Application Requirements	Demonstration of Project Compliance
as not to preclude their efficient development	community hubs, public spaces, or other related land uses, the Project does not propose sidewalks, bike routes, pedestrian connections, bike ways, or other similar infrastructure. Further, the Project is not intended to be accessible by the general public. Therefore, public amenities are not provided.
A connectivity analysis prepared by a qualified professional describing the existing and future vehicular, bicycle and pedestrian connections between the proposed planned unit development and existing and planned land uses on adjacent properties	Refer to **Appendix H**, Traffic Impacts Study, that details anticipated future vehicular patterns and mitigation measures.
The applicant shall submit either: • A determination by USA that site assessment is not necessary, or • A USA Service Provider Letter	Not applicable.
An applicant for a project or phase of a multi-phase project that is forecast to generate one hundred (100) or more average daily auto trips, shall submit as a part of the PUD application a traffic impact report. The report shall analyze the impact of the project or phase of a project on the County and State road and street systems within one mile of the borders of the project or phase of a project, or to such greater distance as necessary until the traffic analysis shows that the impact of the project or phase of a project has dissipated to where it no longer results in an impact of ten percent (10%) or more over current conditions. Such report shall be prepared and certified by a registered traffic engineer licensed in the State of Nevada. The required report shall comply with the standards listed in the Lyon County Design Criteria and Improvement Standards for Traffic Analysis contained in appendix B on file in the County.	Refer to **Appendix H**, Traffic Impacts Study, prepared by Nevada state licensed traffic engineers at Kimley-Horn, dated November 2025. As noted in the TIS, existing traffic patterns are generally adequate to serve the Project. Refer to **Appendix H** for more information on TIS recommendations. However, during public discussions held for the Specific Plan application, it was determined by Lyon County that traffic improvements will be needed. The TIS is currently with the Department of Transportation for approval (as of May 12, 2026); which is planned to be issued prior to the PUD hearing associated with this application. Though, NDOT's typical approval timeline is around 3-4 weeks. Copia Power is engaged in ongoing conversations with applicable agencies regarding viable solutions for traffic mitigation.
The proposed covenants, conditions and restrictions to be recorded if the PUD is approved. The covenants, conditions and restrictions shall incorporate appropriate provisions for the establishment and maintenance of long-term PUD site development standards, including enforcement mechanisms designed to assure coherent, coordinated development,	Refer to **Appendix I** for copies of the land titles for both properties comprising the Project Site. Copia Power, or subsequent site owner, understands and recognizes the Project Site will require ongoing routine site maintenance and intends to maintain the Project Site in a manner acceptable to Lyon County. The Project Site is not subject to any known covenants, easements, or other similar

Application Requirements	Demonstration of Project Compliance
maintenance and use activity with the PUD site.	restrictions, nor does this application propose any. Any conditions of approval and PUD handbook specifications will be recorded with Lyon County, as applicable. Copia Power will comply with conditions set forth by Lyon County. The Project will not include restrictions regarding common areas, or general deed restrictions, that are commonly associated with residential PUDs.
Letters of Intent to Serve from each utility providing service to the planned unit development	Refer to **Appendix J** for a copy of letters of intent to serve from applicable utilities, including NV Energy and Great Basin.
Tentative map or maps for all land included in the PUD. Tentative subdivision maps, if processed concurrently with the tentative PUD approval application, shall be prepared in accordance with the standards for tentative maps contained in the Lyon County Design Criteria and Improvement Standards, appendix B on file in the County	The Project is not a residential PUD. Therefore, subdivision maps are not applicable. Subdivision requirements do not apply.

5. SECTION 15.349.10: APPROVAL OR DENIAL OF APPLICATION

This Section of the Lyon County Development Code Discusses required findings for PUDs. **Table 6** below discusses required findings and demonstration of Project compliance.

TABLE 6: DEMONSTRATION OF COMPLIANCE WITH PUD APPROVAL FINDINGS

Finding Criteria	Demonstration of Project Compliance
Finding A. In what respects the plan is or is not consistent with the statement of objectives of this chapter	The proposed PUD is consistent with the statement of objections and purpose for PUDs set forth in Lyon County Code Section 15.341.01, and the statement of standards and criteria set forth in Section 15.349.03. As discussed in more detail above, the Project advances the following objectives: (1) it establishes land use patterns that promote efficient, compact networks of streets and utilities that lower development and maintenance costs and conserve energy (Section 15.349.01.A.2); (2) it helps preserve valued environmental resource lands by concentrating development on previously disturbed agricultural land and maintains 20–40% of the site as natural open space (Section 15.349.01.A.3); (3) it helps maintain and enhance surface and ground water quality and quantity by utilizing air-cooled systems and limiting water consumption to below 100 ac-ft/year (Section 15.349.01.A.4); (4) it helps protect and maintain critical wildlife habitat by coordinating with NDOW and avoiding

Finding Criteria	Demonstration of Project Compliance
	disruption to the adjacent Mason Valley Wildlife Management Area (Section 15.349.01.A.6); (5) it helps provide for a well-located, clean, safe, and pleasant industrial site involving a minimum of strain on transportation facilities, given the Project's remote location over one mile from Highway 95 (Section 15.349.01.A.8); (6) it encourages innovations in development so that growing demands may be met by greater variety in type, design, and layout of buildings and by conservation of open space (Section 15.349.01.A.9); (7) it minimizes the burden of traffic on roads and highways through site access via Sierra Way and proposed traffic mitigation measures (Section 15.349.01.A.10); and (8) it helps ensure the purposes, goals, objectives and policies of the Lyon County Comprehensive Master Plan are achieved, as demonstrated by the Master Plan goal-by-goal analysis in Table 2 of this narrative (Section 15.349.01.A.11). The Project is consistent with, and furthers many of, the goals of the Master Plan, supports economic development opportunities in the County, and includes site design details that will minimize impacts to surrounding properties.
Finding B. The extent to which the plan departs from zoning and planned unit development regulations otherwise applicable to the property, including but not limited to density, size and use, and the reasons such departures are or are not deemed to be in the public interest	The primary purpose for the PUD application is to support a mix of land uses on the same parcel that would otherwise not be permissible through conventional zoning mechanisms. However, the plan only departs from the standard zoning regulations to the limited extent necessary to accommodate a use that the Lyon County Development Code does not specifically address. Because the Code does not include provisions specific to data centers, conventional zoning mechanisms cannot accommodate the mix of complimentary land uses required for the Project's operations. The specific departures are narrow, well-justified, and consistent with the public interest: (a) Use: The Project combines a data center with ancillary natural gas generation and BESS facilities on a single site. These uses are functionally integrated and necessary to support data center operations. Notably, energy production and distribution are already conditionally permitted in the RR-20 district, and the proposed uses are consistent with the character and scale of other approved energy projects in the immediate vicinity, including the Walker River Substation complex, Winston

Finding Criteria	Demonstration of Project Compliance
	Solar, and the Greenlink transmission lines. The PUD mechanism is the appropriate vehicle to authorize this integrated development in a manner that ensures coordinated site planning and County oversight. (b) BESS Setbacks: Ordinance No. 640 requires a one (1) mile setback from trails, highways, bodies of water, and existing residential uses. The Project proposes a modest reduction from this standard; however the proposed BESS location maintains a setback of 2,400 feet from the nearest residential structure (See **Appendix Q**), which is nearly half a mile and provides a substantial safety buffer well in excess of industry norms. Importantly, there are no other intermittent or perennial streams, highways or trail easements within a mile of the proposed BESS location, meaning the deviation applies only to the residential setback component and the 2,400-foot buffer far exceeds what is necessary to protect public safety. (c) Site Coverage: The Project's 60–80% lot coverage reflects the operational requirements of a data center campus and is appropriate for the proposed industrial use. All structures maintain minimum 30-foot setbacks from property lines, ensuring that adjacent properties are not adversely affected. These limited departures serve the public interest. The Project represents an estimated $12 billion capital investment in Lyon County, will create at least 150 permanent jobs and over 2,000 annual construction jobs, and will generate $1.5 billion in real and personal property tax revenue along with approximately $250 million in sales tax revenues. The Project advances the County's economic diversification goals, responds to critical nationwide demand for data center infrastructure, and leverages existing and planned energy infrastructure in the region. The departures do not establish any precedent for incompatible development; rather, they are narrowly tailored to the unique operational characteristics of this specific facility and will be governed by the PUD's recorded development standards and conditions of approval.
Finding C. The purpose, location and amount of the open space in the planned unit development, the reliability of the proposals for maintenance and conservation	The Project proposes 20-40% open space, meeting or exceeding the 20% requirement required by Section 15.349.03.I. All areas not intended for structures will be maintained as

Finding Criteria	Demonstration of Project Compliance
of the open space and the adequacy or inadequacy of the amount and purpose of the open space as related to the proposed density and type of residential development	natural open space areas, preserving the rural character of the site and providing visual screening and a natural buffer between the development and adjacent properties, particularly the Mason Valley Wildlife Management Area to the north and east and rural residential properties to the west. Proposed vegetation consists of naturally occurring, drought-tolerant plantings that will not require substantial maintenance or routine watering, consistent with the area's rural character and water conservation goals. Copia Power, or any subsequent site owner, will be responsible for ongoing maintenance of all open space areas in a manner acceptable to Lyon County and will comply with any conditions of approval regarding long-term maintenance obligations. As the Project is not a residential development, the open space is proportional to the proposed use and surrounding character. The Project's location, absence of public access, and lack of visibility from Highway 95 further support the adequacy of the proposed open space for its intended screening and environmental conservation purposes.
Finding D. A physical design of the plan and in the manner in which such design does or does not make adequate provision for public services, provide adequate control over vehicular traffic, parking requirements, and further the amenities of light and air, recreation and visual enjoyment	The physical design of the Project ensures adequate provisions are made for public services, vehicular traffic, parking, and the amenities of light and air, recreation, and visual enjoyment. The Project Site is located in a rural, and largely undeveloped, area of Lyon County. The proposed land use and accessory uses serve as complimentary to existing energy infrastructure and other regionally significant energy projects in the immediate vicinity. The Project will not require Lyon County public water or sewer hookup or extensions. Water will be sourced onsite through existing privately held water rights, with total consumption anticipated to be below 100 ac-ft/year — a fraction of what the site historically consumed for agricultural operations. Wastewater will be managed independently through either septic or an onsite treatment facility. The Project will coordinate closely with the local fire department on emergency response planning and will provide onsite emergency water

Finding Criteria	Demonstration of Project Compliance
	storage, including a potential 1-million-gallon water storage tank. Because the Project is self-sufficient from a utility perspective, it places no burden on existing public services or infrastructure serving Lyon County residents. Additionally, considering the upcoming Walker River substation Complex and Greenlink transmission projects, the Project will be adequately served with enough power to maintain the facility and will not result in the loss or reduction of energy to the Lyon County community. The load-serving utility will plan for and allocate energy for the Project's needs, which will include energy generated on-site and via other energy generation projects Copia Power is developing that serve the electric grid. The price paid for power will include all upgrades and costs to serve the data center under a special contract and PUCN-approved tariff, so that costs are not shifted to residential or small business customers or subsidized by other ratepayers. The Traffic Impact Study (**Appendix H**) demonstrates that existing roadway infrastructure is generally adequate to serve the Project. Traffic impacts will be most notable during the temporary construction phase, and the study describes proposed mitigation efforts to increased traffic during construction. The Project is accessed from Sierra Way, sited over one mile from Highway 95, which minimizes impacts to the County's primary corridor in the vicinity of the Project. Copia Power is actively coordinating with NDOT and Lyon County on traffic mitigation strategies, and the TIS is currently under NDOT review with approval anticipated prior to the PUD hearing. Post-construction, the Project's low staffing requirements will generate minimal ongoing traffic. A dedicated Parking Study prepared by Kimley-Horn (**Appendix P**) supports the proposed 920 parking spaces as adequate for the Project's operational needs. The permanent-use of the facility will have minimal onsite staffing, no public access, and low parking demand, which are precisely the type of use contemplated by the exception criteria of Section 15.349.03.M.3 for permanent uses with low demand for off-street parking.

Finding Criteria	Demonstration of Project Compliance
	Proposed structures are situated within a compliant setback distance for the underlying RR-20 District, with a minimum of 30 feet from each property line. Building heights of 75-95 feet are appropriate for data center operations and, given the Project's remote location over one mile from Highway 95 and the nearest residential areas, will not impact adjacent properties. Structures will be constructed from materials in a neutral color consistent with the surrounding rural landscape. The Project Site will be adequately landscaped, as per the requirements of the Lyon County Development Code and will not result in the degradation of natural resources or wildlife habitats. There will be no changes to current outdoor activities commonly practiced on neighboring NDOW land, such as hunting, fishing, bird watching, or other similar activities. Visual simulations (**Appendix C**) confirm that the Project's visual impact from surrounding vantage points will be minimal, and the site will be landscaped with native vegetation consistent with the existing rural character.
Finding E. The relationship, beneficial or adverse, of the proposed planned unit development to the neighborhood in which it is proposed	The proposed PUD will result in a substantial net benefit to Lyon County and the surrounding community. The Project's economic impact will be significant and sustained, and will include: • An estimated $12 billion in initial capital investment. • At least 150 permanent direct jobs and at least 100 indirect and induced jobs in the local economy. • Over 2,000 annual construction jobs supported. • Over $100 million total payroll impact. • Over $1.5 billion in real and personal property tax revenue to Lyon County (including schools and other tax jurisdictions) which can be used for community improvements and enhancements. • Approximately $250 million in sales tax revenues including contribution to the local government. • Indirect economic activity for nearby commercial businesses, restaurants, and the supply chain. • Road improvements. • Economic diversification of Lyon County beyond agriculture, which creates resiliency for the future.

Finding Criteria	Demonstration of Project Compliance
	• Response to a nationwide need for data center facilities due to emerging computational power needs. • Support for local landowner and agricultural producer to collect supplemental income on nonviable agricultural land. Potential adverse impacts are limited and well-mitigated. Construction-phase traffic is the most visible temporary impact which is addressed through the Traffic Impact Study (**Appendix H**) and ongoing coordination with NDOT and Lyon County on road improvements. Post-construction traffic will be minimal given the Project's low staffing requirements. Water consumption will be below 100 ac-ft/year using air-cooled systems, sourced entirely from privately held water rights with no draw on County municipal supplies, which is far less than the agricultural operations historically conducted on the same land. The BESS facility will incorporate 24/7 remote monitoring, battery management systems, heat, smoke, and gas detectors, and onsite emergency water storage, with a coordinated emergency response plan developed in partnership with the local fire department. The Project is located over one mile from Highway 95 and will use neutral-colored building materials and native vegetation screening, resulting in minimal visual impact as confirmed by visual simulations in Appendix C. Copia Power is coordinating with NDOW on wildlife surveys to ensure the Project coexists with the adjacent Mason Valley Wildlife Management Area without impacting public access or recreational use. On balance, the proposed PUD will deliver transformative economic benefits to Lyon County while imposing only limited, well-mitigated impacts on the surrounding neighborhood.
Finding F. In the case of a plan which proposes a development over a period of years, the sufficiency of the terms and conditions intended to protect the interest of the public and the residents of the planned unit development in the integrity of the plan.	The Project is anticipated to be fully constructed within 3-4 years. This schedule coincides with NV Energy's planned infrastructure upgrades, including the completion of the Walker River Substation complex and Greenlink transmission infrastructure. The terms and conditions governing this phased development are sufficient to protect

Finding Criteria	Demonstration of Project Compliance
	the interest of the public and the integrity of the plan throughout the development period. Copia Power will comply with all conditions of approval set forth by Lyon County, including any recorded covenants, conditions, and restrictions that incorporate long-term site development standards, maintenance obligations, and enforcement mechanisms designed to assure coherent, coordinated development, maintenance and use activity within the PUD site. Development phasing will be coordinated with NV Energy's infrastructure upgrade schedule to ensure adequate utility capacity is in place before each phase is brought online, and all energy rates paid by the Project will include required upgrade costs so that no costs are shifted to residential or small business ratepayers. Traffic mitigation measures identified in the Traffic Impact Study (**Appendix H**) will be implemented prior to or concurrent with construction phases that generate increased traffic. Wildlife surveys will be completed in coordination with NDOW, and the Project will maintain open space buffers and native vegetation throughout all phases. BESS facilities will incorporate 24/7 remote monitoring from the outset, and Copia Power will maintain a coordinated emergency response plan with the local fire department, including onsite emergency water storage, throughout all phases of development. Copia Power, or any subsequent site owner, will maintain the Project Site in a manner acceptable to Lyon County throughout the development period and beyond. These commitments, together with any additional conditions the Board may impose at the time of tentative approval, provide robust protections for the public interest and ensure the integrity of the approved plan is maintained from initial construction through project completion.

6. APPENDICES