

## Literature Cited

- Arizona State Historic Preservation Office (SHPO). 2004. *SHPO Position on Relying on Old Archaeological Survey Data*. SHPO Guidance Point No. 5. Phoenix: Arizona State Parks.
- Arizona State Museum (ASM). 1995. *Revised Site Definition Policy*. Tucson: Arizona State Museum, University of Arizona.
- Barr, D.M.R., A.J. Lutes, E.S. Petersen, M. Evancho, and S. Stapleton. 2021. *Archaeological Survey for the Proposed Babbitt Ranch Energy Center I Coconino County, Arizona (ASLD Right-of-Way Application No. 014-122007-00-100)*. Cultural Resources Report No. 21-383. Tucson, Arizona: SWCA Environmental Consultants.
- Barr, D.M.R., A.J. Lutes, T. Roberts, S. Griset, E.S. Petersen, S. Stapleton, M. Evancho, and S. Lewis. 2022. *Cultural Resources Survey for the Babbitt Ranch Energy Center Interconnection Project, Coconino County, Arizona (ASLD Special Land Use Permit No. 23-121482-17; ASLD Right-of-Way Application No. 014-122007-00-100)*. Cultural Resources Report No. 22-405. Tucson, Arizona: SWCA Environmental Consultants.
- Barr, D.M.R., H. West, E.S. Petersen, and S. Lewis. 2023. *Archaeological Survey of 3,364 Acres of Private, ASLD-Administered, and KNF-Administered Lands: Addendum 2 to the Archaeological Survey for the Proposed Babbitt Ranch Energy Center in Coconino County, Arizona (ASLD Right-of-Way Application No. 014-122007-00-100)*. Cultural Resources Report No. 23-219. Tucson, Arizona: SWCA Environmental Consultants.

## EXHIBIT F. RECREATION

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*As stated in the Arizona Corporation Commission Rules of Practice and Procedure R14-3-Exhibit 1, the intent of this exhibit is to:*

*State the extent, if any, the proposed site or route will be available to the public for recreational purposes, consistent with safety considerations and regulations and attach any plans the applicant may have concerning the development of the recreational aspects of the proposed site or route.*

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### Introduction

The 1886 Solar Energy Station Interconnection Project (Interconnection Project) would be built on open rangeland just north of and parallel to the existing Moenkopi to Cedar Mountain 500-kV transmission line right-of-way. Unpaved ranch roads cross under and run along the length of the existing transmission lines. Vehicle access to the Interconnection Project is via unpaved ranch roads. Throughout Exhibit F, the term Study Area refers to a 1-mile area buffered around the Interconnection Project.

### Methods

Information regarding recreational uses of the Study Area was drawn from information provided by Babbitt Ranches, owner of the private land in the Study Area, and the Arizona Game and Fish Department (AGFD) Environmental Review Tool report (AGFD 2023).

### Results

Recreation in the Study Area is limited to dispersed activities, primarily hunting. The Study Area falls within the AGFD's Game Management Units 7E and 9. Game species identified by the AGFD as possibly occurring in the area include America pronghorn (*Antilocapra americana americana*), elk (*Cervus elaphus*), mule deer (*Odocoileus hemionus*), mountain lion (*Puma concolor*), band-tailed pigeon (*Patagioenas fasciata*), and mourning dove (*Zenaida macroura*) (AGFD 2023). Camping and general sightseeing may occur as well. The Study Area is less than 1 mile from U.S. Route 180, a popular route to the Grand Canyon, and includes a small portion of the Kaibab National Forest. Travelers commonly pull off all along the highway to camp and explore, and the Study Area is readily accessible via Powerline Road, an unimproved road that runs parallel to the existing transmission lines. Access to the National Forest, Arizona State Trust land, and private property owned by Babbitt Ranches is unrestricted under most conditions, and dispersed camping is permitted.

The proposed route for the Interconnection Project would not interfere with existing recreation opportunities in the vicinity. During construction, access to work sites would be restricted for public safety. 1886 Solar Energy Station LLC (the Applicant) has no plans to develop any additional recreational opportunities in the area.

## Literature Cited

Arizona Game and Fish Department (AGFD). 2023. Arizona Environmental Review Tool Report, CO Bar Solar Interconnection Project – BAE Action Area. ID: HGIS-18135. January 9, 2023.

## EXHIBIT G. CONCEPTUAL DRAWINGS OF TRANSMISSION FACILITIES

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As stated in the Arizona Corporation Commission Rules of Practice and Procedure R14-3-219:

*Attach any artist's or architect's conception of the proposed plan or transmission line structures and switchyards, which applicant believes may be informative to the committee.*

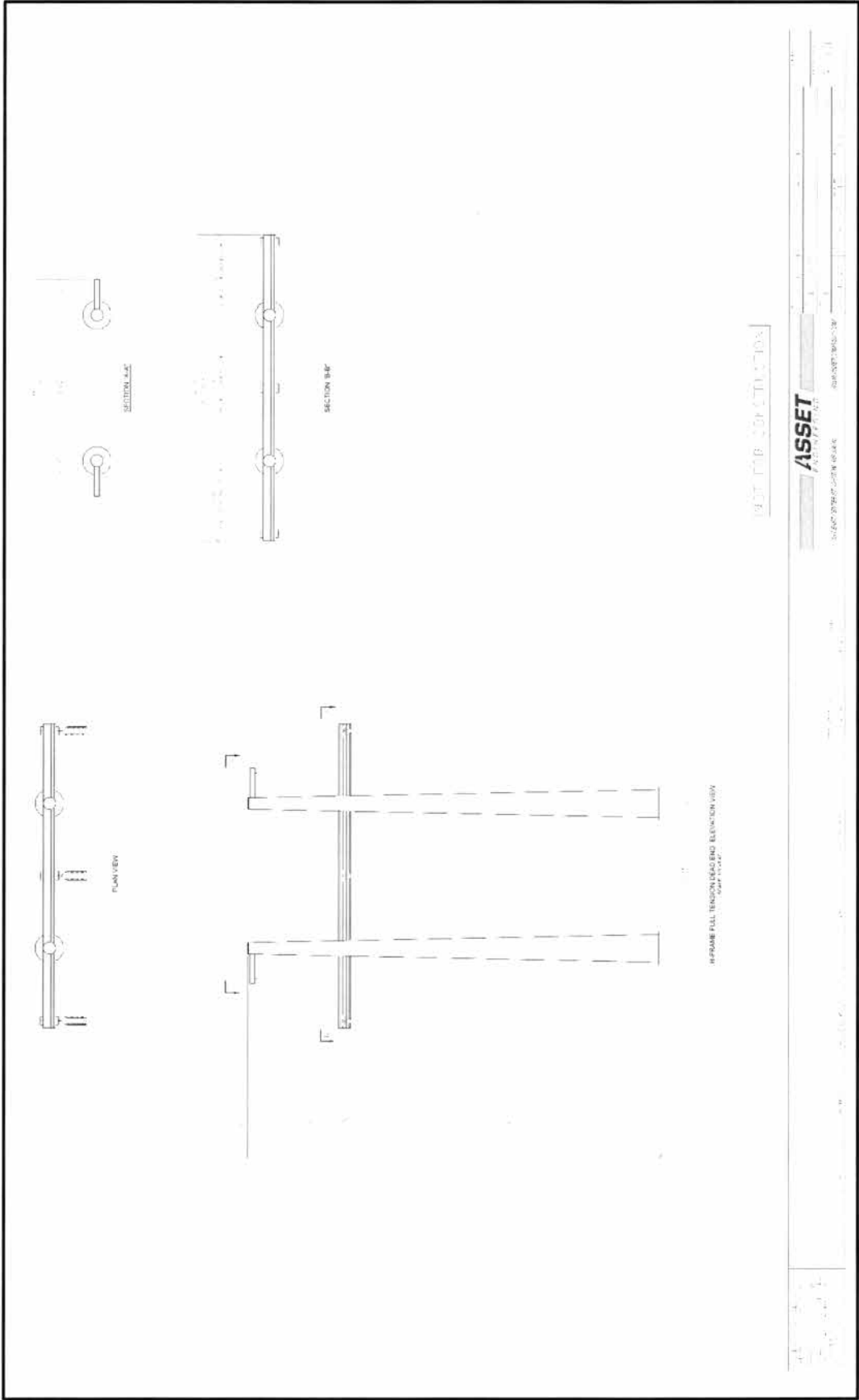
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Exhibit G-1: Typical 500-kV H-frame tubular steel dead end structure diagram

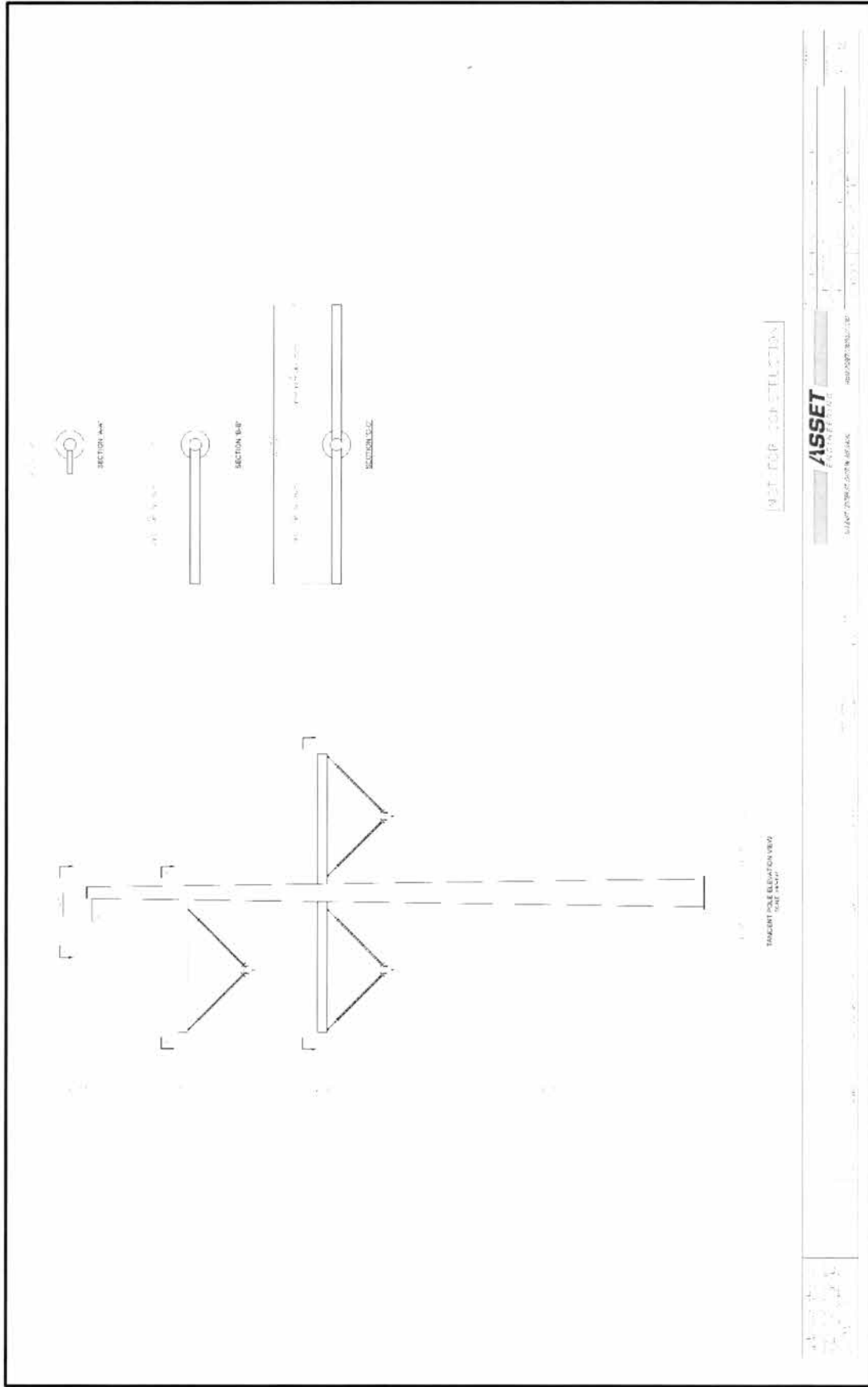
Exhibit G-2: Typical 500-kV single-pole tubular steel tangent structure diagram

Exhibit G-3: Typical 500-kV single-pole tubular steel dead end/angle structure diagram

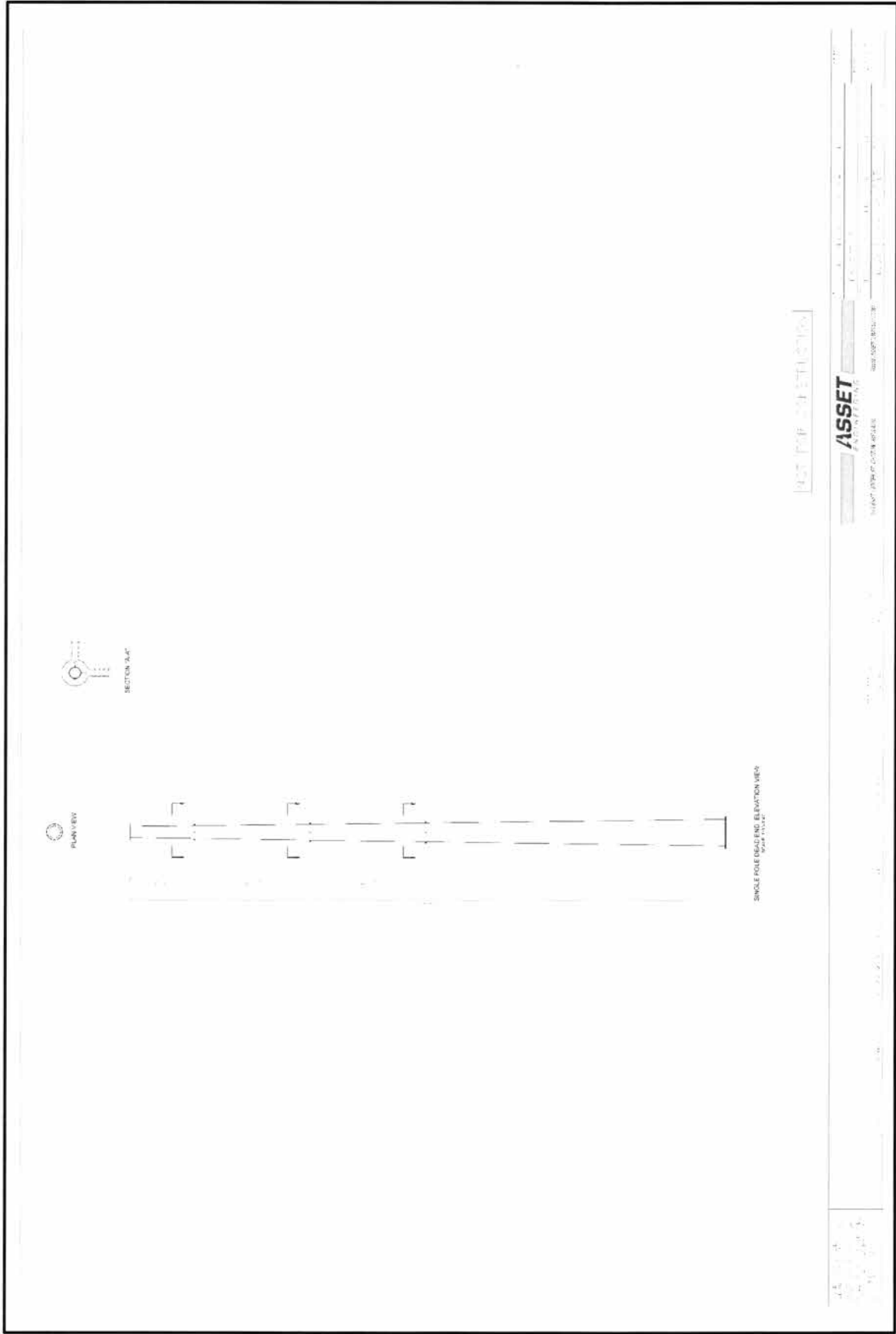
Exhibit G-4: Typical 500-kV A-frame riser structure diagram



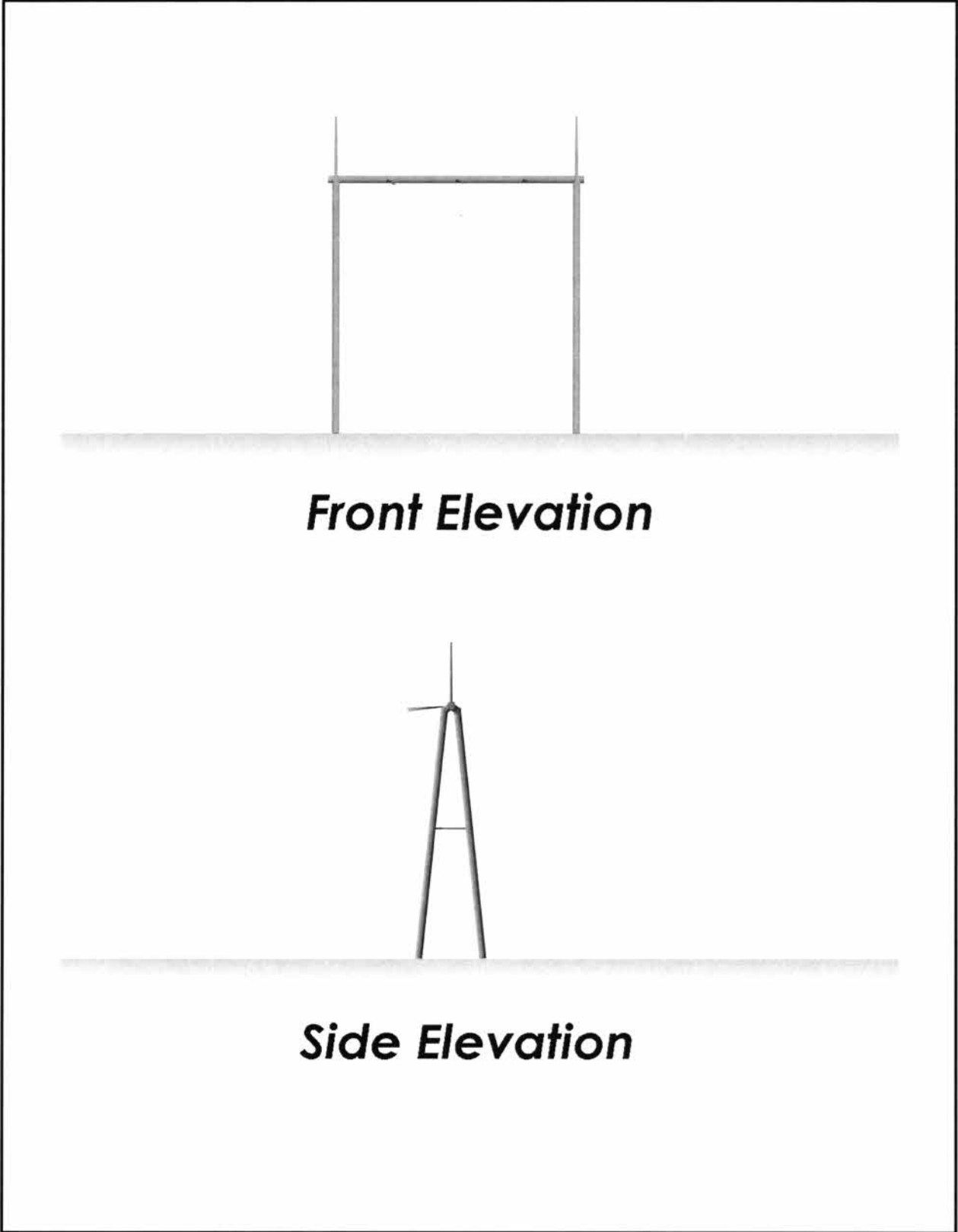
**Exhibit G-1. Typical 500-kV H-frame tubular steel dead end structure diagram.**



**Exhibit G-2. Typical 500-kV single-pole tubular steel tangent structure diagram.**



**Exhibit G-3. Typical 500-kV single-pole tubular steel dead end/angle structure diagram.**



***Front Elevation***

***Side Elevation***

**Exhibit G-4. Typical 500-kV A-frame riser structure diagram.**



# EXHIBIT H. EXISTING PLANS

As stated in the Arizona Corporation Commission Rules of Practice and Procedure R14-3-220, Ex. H:

*To the extent applicant is able to determine, state the existing plans of the state, local government, and private entities for other developments at or in the vicinity of the proposed site or route.*

## Overview

Existing and planned land use are discussed in Exhibit B and mapped in Exhibit A. 1886 Solar Energy Station LLC (the Applicant) mailed a letter requesting information on planned developments within the vicinity of the 1886 Solar Energy Station Interconnection Project (Interconnection Project) to a list of agency, tribal, and jurisdictional entities. In addition, the Interconnection Project team reviewed publicly available information regarding other renewable energy developments. Overall, no existing plans for planned developments were identified that would be incompatible with the proposed Interconnection Project.

## Outreach Letters

On June 2, 2023, the Applicant mailed letters to a broad group of stakeholders (Table H-1) to provide information about the Interconnection Project and request new or additional information regarding planned area developments. Exhibit H-1 provides a copy of the letter.

**Table H-1. Entities that Received a Letter Requesting Information Regarding Other Developments**

Organization	Contact Name	Contact Title
South Rim Property Owners Association*		
Arizona Trail Association	Matthew Nelson	Executive Director
Grand Canyon National Park	Jan Balsom	Chief, Communications, Partnerships & External Affairs
Kaibab National Forest	Debra Mollett	Williams District Ranger
Coconino National Forest	Matthew McGarth	Flagstaff District Ranger
U.S. Naval Observatory Flagstaff Station	Mary Beth Dreusike	Community Planning & Liaison Officer
U.S. Fish and Wildlife Service	Shaula Hedwall	Senior Fish and Wildlife Biologist, Arizona Ecological Services
U.S. Fish and Wildlife Service	Greg Beatty	Fish and Wildlife Biologist, Arizona Ecological Services
U.S. Fish and Wildlife Service	Kristen Madden	DMB Chief, Southwest Region
U.S. Fish and Wildlife Service	Kammie Kruse	Permits Branch Chief, Migratory Birds
U.S. Fish and Wildlife Service	Kirsten Cruz-McDonnell	Migratory Bird Biologist
Arizona Game and Fish Department	Tiffany Sprague	Project Evaluation Program Specialist
Arizona State Land Department	Ruben Ojeda	Rights of Way Section Manager

Organization	Contact Name	Contact Title
Coconino County	Patrice Horstman	District 1 Supervisor
Coconino County	Jeronimo Vasquez	District 2 Supervisor
Coconino County	Matt Ryan	District 3 Supervisor
Coconino County	Judy Begay	District 4 Supervisor
Coconino County	Lena Fowler	District 5 Supervisor
Coconino County	Lindsay Daley	Clerk of the Board of Supervisors
Coconino County	Bob Short	Principal Planner, Community Development
Arizona Public Service	Jason Spitzkoff	Manager, Transmission Engineering
Fort Mojave Indian Tribe	Timothy Williams	Chairman
Fort Mojave Indian Tribe	Linda Otero	Director, Ahamakav Cultural Society
Havasupai Tribe	Thomas Siyuja, Sr.	Chairman
Havasupai Tribe	Travis Hamidreek	Director of Natural Resources
Havasupai Tribe	Edmond Tilousi	Vice Chairman
Hopi Tribe	Timothy L. Nuvangyaoma	Chairman
Hopi Tribe Cultural Preservation Office	Stewart Koyiyumptewa	Tribal Historic Preservation Officer
Hualapai Tribe	Sherry J. Parker	Chairperson
Hualapai Tribe	Martina Dawley	Tribal Historic Preservation Officer, Department of Cultural Resources
Pueblo of Zuni	Arden Kucate	Governor
Pueblo of Zuni – Heritage and Historic Preservation Office	Kurt Dongoske	Director, Tribal Historic Preservation Officer
Mescalero Apache Tribe	Eddie Martinez	President
Mescalero Apache Tribe	Holly Houghten	Tribal Historic Preservation Officer
Navajo Nation	Buu Nygren	President
Navajo Nation – Heritage & Historic Preservation Department	Richard Begay	Tribal Historic Preservation Officer / Heritage & Historic Preservation Department Director
Navajo Nation Division of Natural Resources	Rudy R. Shebala, Ph.D.	Executive Director Division of Natural Resources
Navajo Nation, Cameron Chapter	Charlie Smith Jr.	President
Navajo Nation, Cameron Chapter	Candis Yazzie	Vice President
San Carlos Apache Tribe	Terry Rambler	Chairman
San Carlos Apache Tribe	Vernelda Grant	Tribal Historic Preservation Officer
Yavapai-Apache Nation	Tanya Lewis	Chairwoman
Yavapai-Apache Nation	Chris Coder	Tribal Archaeologist
Babbitt Ranches LLC*		

\* Indicates that the letter was addressed to the jurisdiction/agency/entity in general, rather than to a specific person.

The Applicant received a comment letter from the Arizona Game and Fish Department in response to the June 2, 2023, outreach letter requesting information about known plans for development; the AGFD letter is included as Exhibit H-2. The AGFD letter includes recommended best management practices for the Interconnection Project. The AGFD letter does not identify any plans for development.

## Existing Plans for Other Developments

In addition to the 1886 Solar Energy Station, the Applicant is aware of three planned utility-scale energy facilities within the vicinity of the Interconnection Project—the Babbitt Ranch Energy Center Project, the CO Bar Solar Complex, and the Forged Ethic Wind Energy Project. Based on publicly available information, it appears all three projects intend to interconnect to the APS Switchyard (Coconino County 2022:130; U.S. Bureau of Reclamation [Reclamation] 2022). Additionally, it appears that the Forged Ethic Wind Energy Project is outside of the Study Area.

### ***Babbitt Ranch Energy Center Project, Arizona***

The Babbitt Ranch Energy Center is a 161-megawatt (MW) renewable energy project that consists of a proposed 160-MW wind energy facility, a 60-MW solar photovoltaic energy facility, and up to 60 MW of energy (battery) storage on private and Arizona State Trust lands in Coconino County, Arizona. The Babbitt Ranch Energy Center is also on the CO Bar Ranch and includes a 7.25-mile access road from U.S. Route 180 to the project. Construction of this project began at the end of 2022 with a target completion date of December 2023. Reclamation published an environmental assessment in December 2022 for the project's interconnection transmission line (Reclamation 2022).

### ***CO Bar Solar Complex***

The CO Bar Solar Complex is a 400-MW solar project on the CO Bar Ranch, in unincorporated Coconino County, Arizona. Construction of this project is anticipated to begin in 2023, with a target completion year of 2024 (Reclamation 2022).<sup>3</sup> As noted in the Introduction and Exhibit B, the 1886 Solar Energy Station was formerly part of the CO Bar Solar Complex, which received conditional use permits from Coconino County in June 2022. The relevant conditional use permit approvals for CO Bar Solar Complex were transferred to Stellar Renewable Power.

### ***Forged Ethic Wind Energy Project***

The Forged Ethic Wind Energy Project is a 323-MW wind project on the CO Bar Ranch in unincorporated Coconino County, Arizona. The Forged Ethic Wind Energy Project is on approximately 29,106 acres of private land and Arizona State Trust land, approximately 25 miles north of Flagstaff, Arizona (RWE 2023).

The Forged Ethic Wind Energy Project includes the construction and operation of a 323-MW wind energy facility consisting of approximately 102 turbines and other associated facilities. The Forged Ethic Wind Energy Project also includes a proposed approximately 5-mile, 500-kilovolt generation intertie transmission line and interconnection with the existing Moenkopi to Cedar Mountain 500-kilovolt transmission line operated by Arizona Public Service (RWE 2023).

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<sup>3</sup> The portion of CO Bar Solar that will be constructed by 2024 excludes the 1886 Solar Energy Station, which was sold to Stellar Renewable Power.



June 2, 2023

South Rim Property Owners Association  
3205 Lakeside Village  
Prescott, AZ 86301

Re: 1886 Solar Generation Intertie Transmission Line Project

Dear Sir or Madam,

Stellar Renewable Power plans to file an application for a Certificate of Environmental Compatibility (CEC) with the Arizona Power Plant and Transmission Line Siting Committee (Siting Committee) for a proposed transmission line referred to as the 1886 Solar 500-kilovolt (-kV) Generation Intertie Transmission Line Project (Project). The Project involves a new, approximately 5-mile-long, 500-kV generation intertie (gen-tie) transmission line that would connect Stellar's planned 1886 Solar Energy Center to the regional electric grid at a planned Arizona Public Service (APS) switchyard along the existing Moenkopi to Cedar Mountain 500 kV transmission line. The 1886 Solar Energy Center would include a solar/photovoltaic generating facility and battery energy storage system, each with a capacity of up to 500 megawatts (MW). The Project would be approximately 30 miles northwest of Flagstaff; the proposed route is shown on the enclosed map. Additional information about the Project is available on the Project website: <https://www.swcavirtualpublicinvolvement.com/1886-solar>.

Stellar Renewable Power and its environmental consultant, SWCA Environmental Consultants (SWCA), are preparing a CEC application for the Project. The CEC application will include environmental studies to evaluate the proposed route for the Project. Our planning studies support that the Project follows a direct route to the planned APS switchyard that will minimize the potential for environmental impacts. Stellar Renewable Power plans to submit its CEC application in July 2023.

Arizona Administrative Code Rule R14-3-219 requires that CEC applications include an exhibit that identifies "the existing plans of the state, local government, and private entities for other developments at or in the vicinity of the proposed site or route."

This letter is an opportunity for your organization to provide information or comments regarding development plans for inclusion in the CEC application. We respectfully request your response in writing; specifically, please advise us of any relevant existing or future development plans in the vicinity of the proposed Project.

For Stellar Renewable Power to include your information with its CEC application, please forward your written comments to SWCA by July 14, 2023, via email at [dean.hazle@swca.com](mailto:dean.hazle@swca.com), or by physical mail: Attn: Dean Hazle, SWCA Environmental Consultants, 1645 S Plaza Way, Flagstaff, Arizona 86001. Additionally, you may reach me directly by phone at (928) 288-2634.

Thank you for your cooperation.

Sincerely,

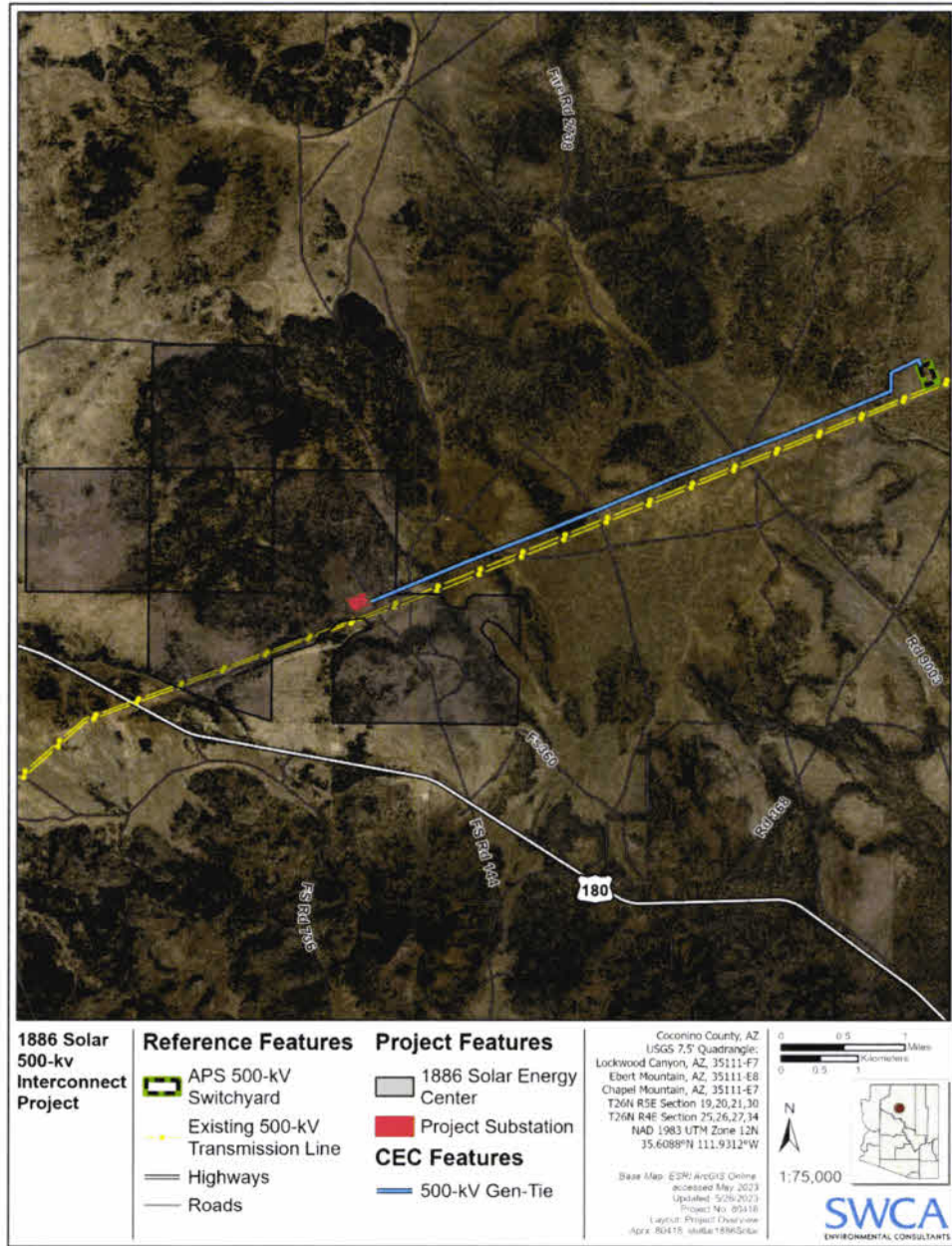
*Dean G. Hazle*

Dean Hazle, Northern Arizona Planning Team Lead  
SWCA Environmental Consultants

**Exhibit H-1a. Example June 2023 Exhibit H letter.**



1886 Solar 500-kV Generation Intertie Transmission Line Project



1886 Solar 500-kV Generation Intertie Transmission Line Project – Project Overview Map

Exhibit H-1b. Example June 2023 Exhibit H letter.



July 13, 2023

Mr. Dean Hazle  
Northern Arizona Planning Team Lead  
SWCA Environmental Consultants  
1645 S. Plaza Way  
Flagstaff, Arizona 86001

Electronically submitted to dean.hazle@swca.com

**RE: 1886 Solar Generation Intertie Transmission Line Project**

Dear Mr. Hazle:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the proposed 1886 Solar Generation Intertie Transmission Line project. The Department understands that Stellar Renewable Power proposes to construct a 5-mile 500-kilovolt (kV) transmission line and associated infrastructure to connect Stellar's planned 1886 Solar Energy Center to the regional electric grid at a planned APS switchyard along the existing Moenkopi to Cedar Mountain 500 kV transmission line. The project is located on private and Arizona State Land Department lands approximately 30 miles north of Flagstaff, Arizona, in primarily pinyon/juniper and desert grassland habitat.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department has a long successful history of working with Babbitt Ranches and Billy Cardasco and looks forward to the continued partnership. The Babbitt Ranches has been a leader in proactively incorporating wildlife conservation actions as stewards of public and private lands, and the Department continues to offer its data and expertise where it can assist Babbitt Ranches in achieving desired conservation outcomes during the development of this project.

The Department recognizes the importance of planning efforts to develop energy locations that contribute to regional and state economic growth needs and would like to work closely with Babbitt Ranches LLC, Stellar Renewable Power, and SWCA Environmental Consultants during

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**azgfd.gov | 928.774.5045**

**FLAGSTAFF OFFICE: 3500 S. LAKE MARY ROAD, FLAGSTAFF AZ 86005**

**GOVERNOR: KATIE HOBBS COMMISSIONERS: CHAIRMAN TODD G. GEILER, PRESCOTT | CLAY HERNANDEZ, TUCSON | MARSHA PETRIE SUE, SCOTTSDALE  
JEFF BUCHANAN, PATAGONIA | JAMES E. COUGHNOUR, PAYSON DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY**

**Exhibit H-2a. AGFD comment letter.**

the planning and development of this facility. The Department recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and recreational access during development and operation of the facilities. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation:

- Maintaining habitat quality and connectivity is a priority for the Department. The Department appreciates that the proposed alignment follows the existing Moenkopi to Cedar Mountain 500 kV transmission line. Additionally, the Department recommends minimizing ground disturbance throughout project implementation to minimize potential impacts to wildlife habitat within these areas.
- Birds of prey, such as raptors, owls, vultures, and eagles, are vulnerable to powerline strikes and electrocution during construction and operation of transmission lines; power poles can also serve as perches for birds of prey. The Department recommends incorporating design features to minimize impacts to these important species, including following standards established by the Avian Power Line Interaction Committee (APLIC), which can be found in [Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006](#)<sup>1</sup> and [Reduced Avian Collisions with Power Lines: The State of the Art in 2012](#)<sup>2</sup>. Tuk Jacobson, the Department's Raptor Coordinator, can provide further information on specific design features and best management practices; he can be contacted at [raptors@azgfd.gov](mailto:raptors@azgfd.gov) or 623-236-7575.
- Avian species that are regulated under the Migratory Bird Treaty Act (MBTA) and protected under state law may nest within the project area. Breeding season for birds in the project vicinity is generally January through late June. If it is anticipated the project will not be in compliance with the MBTA, the Department recommends contacting the [U.S. Fish and Wildlife Service](#)<sup>3</sup> for technical assistance and compliance options. Additionally, if any nesting raptors are detected, the Department recommends planning construction activities for the non-breeding season or coordinating with the Department's Raptor Coordinator on appropriate set-backs from active raptor nests.
- If other wildlife are encountered during construction activities, the Department recommends moving them out of harm's way, no more than 0.25 mile outside the project boundary within similar habitat.
- If trenching or digging of large holes is necessary for anchoring project infrastructure, the Department recommends trenching/digging and backfilling crews be close together to minimize the amount of open holes at any given time. Where trenches or holes cannot be back-filled immediately, the Department recommends escape ramps be constructed at least every 90 meters. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The Department recommends that slopes be less than 45 degrees (1:1) and trenches and holes that have been left open be inspected to remove animals prior to backfilling.

<sup>1</sup> [https://www.aplic.org/uploads/files/2643/SuggestedPractices2006\(LR-2\).pdf](https://www.aplic.org/uploads/files/2643/SuggestedPractices2006(LR-2).pdf)

<sup>2</sup> [https://www.aplic.org/uploads/files/15518/Reducing\\_Avian\\_Collisions\\_2012watermarkLR.pdf](https://www.aplic.org/uploads/files/15518/Reducing_Avian_Collisions_2012watermarkLR.pdf)

<sup>3</sup> <https://www.fws.gov/office/arizona-ecological-services/contact-us>

**Exhibit H-2b. AGFD comment letter.**



- Artificial lighting could impair the ability of nocturnal animals to navigate (e.g., owls, migratory birds, bats, and other nocturnal mammals) and may affect wildlife behavior and populations ([Davies et. al. 2013](#)<sup>4</sup>). The Department recommends using only the minimum amount of light needed for safety and encourages the use of motion sensing and narrow spectrum lighting wherever possible. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.
- To minimize the potential introduction or spread of exotic invasive species, including terrestrial plants, animals, insects, and pathogens, the Department encourages taking precautions to wash and/or decontaminate equipment before entering and leaving the site. See the [Arizona Department of Agriculture website](#)<sup>5</sup> for a list of prohibited and restricted noxious weeds and the [Arizona Native Plant Society](#)<sup>6</sup> for recommendations on how to control them. To view a list of documented invasive species or to report invasive species in or near your project area, visit [iMapInvasives](#)<sup>7</sup>, which is a national cloud-based application for tracking and managing invasive species.
- The Department recommends revegetating disturbed areas with native drought-tolerant species that represent the natural surrounding landscape. Landscaping with native plants can help support wildlife and pollinator species in the area while reducing dust and erosion. In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts.
- For any areas that would be fenced as part of this project, please refer to the Department's [Wildlife Compatible Fencing Guidelines](#)<sup>8</sup> for information on how fencing impacts wildlife, ways to design fencing to prevent wildlife entanglement and impalement, and to ensure wildlife movement is not restricted. Department personnel are available as resources to help determine appropriate fencing design and layout that will achieve its objective while reducing impact to wildlife.

Thank you for the opportunity to provide input on the 1886 Solar Generation Intertie Transmission Line Project. For further coordination, please contact Hannah Griscom at [hgriscom@azgfd.gov](mailto:hgriscom@azgfd.gov) or 928-214-1253.

Sincerely,



Larry Phoenix  
Regional Supervisor, Region 2 (Flagstaff)

cc: Billy Cardasco – Executive Director, Babbitt Ranches  
Jessica Simmons – Wildlife Planner, Coconino County

<sup>4</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119>

<sup>5</sup> <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>

<sup>6</sup> <https://aznps.com/invas>

<sup>7</sup> <https://imap.natureserve.org/imap/services/page/map.html>

<sup>8</sup> [https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/Files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125\\_AGFD\\_fencing\\_guidelines.pdf](https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/Files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125_AGFD_fencing_guidelines.pdf)

Exhibit H-2c. AGFD comment letter.



*AZGFD – 1886 Solar Generation Intertie Transmission Line Project*  
July 13, 2023  
Page 4

Bob Short – Planner, Coconino County  
Shaula Hedwall – Fish and Wildlife Biologist, U.S. Fish and Wildlife Service  
Ginger Ritter – Project Evaluation Program Supervisor  
Tiffany Sprague – Project Evaluation Program Specialist

AZGFD #M23-06224927

**Exhibit H-2d. AGFD comment letter.**

## Literature Cited

- Coconino County. 2022. Preliminary CO Bar Solar Facility Project Map. Presented at Coconino Planning and Zoning Commission Public Meeting, June 29, 2022. Available at: [https://coconino.az.gov/AgendaCenter/ViewFile/Agenda/\\_06292022-5889](https://coconino.az.gov/AgendaCenter/ViewFile/Agenda/_06292022-5889). Accessed June 2023.
- RWE. 2023. Forged Ethic Wind Energy Project. Available at: <https://americas.rwe.com/projects-and-locations/forged-ethic-wind-energy-project/>. Accessed June 2023.
- U.S. Bureau of Reclamation (Reclamation). 2022. *Final Environmental Assessment for the Babbitt Ranch Energy Center Interconnection Project*. Glendale, Arizona: U.S. Bureau of Reclamation, Phoenix Area Office. December. Available at: [https://www.usbr.gov/lc/phoenix/reports/BREC/FinalEA\\_BREC\\_Interconnection\\_Project.pdf](https://www.usbr.gov/lc/phoenix/reports/BREC/FinalEA_BREC_Interconnection_Project.pdf). Accessed June 2023.

# EXHIBIT I. NOISE

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*As stated in the Arizona Corporation Commission Rules of Practice and Procedure R14-3-219:*

*Describe the anticipated noise emission levels and any interference with communication signals which will emanate from the proposed facilities.*

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## Introduction

The 1886 Solar Energy Station Interconnection Project (Interconnection Project) would be built on open rangeland just north of and parallel to the existing Moenkopi to Cedar Mountain 500-kilovolt (kV) transmission line right-of-way. Unpaved ranch roads cross under and run along the length of the existing transmission lines. Vehicle access to the Interconnection Project is via unpaved ranch roads.

## Noise

### ***Existing Sound Levels***

The proposed Interconnection Project would traverse rural, largely vacant land used primarily for livestock grazing, related ranching activities, and dispersed recreation. Ambient sound levels in such areas are generally quiet, ranging from 23 to 37 A-weighted decibels (dBA) (mean = 30 dBA) during nighttime hours and from 33 to 47 dBA (mean = 40 dBA) during daytime hours (Eldred 1982). According to the U.S. Environmental Protection Agency (1981), this range roughly equates to the sound of a soft whisper at 15 feet (30 dBA) to light auto traffic at 100 feet (50 dBA).

Existing sources of noise in the vicinity include the Moenkopi to Cedar Mountain 500-kV transmission line and occasional vehicles traveling ranch roads. The existing transmission lines can produce noise from corona discharge, which is the electrical breakdown of air into charged particles. Under dry weather conditions, the audible noise from corona is minor and rarely noticed. During wet and humid conditions, which are atypical in the Study Area, water drops can collect on the conductors and increase corona activity. Under these conditions, a crackling or humming sound may be heard in the immediate vicinity of the line.

### ***Anticipated Noise During Project Construction***

Ground-based equipment needed to construct a transmission project usually includes heavy earthmoving vehicles, cranes, compressors, generators, and trucks. The maximum instantaneous construction noise levels from these sources typically range from 80 to 90 dBA at 50 feet from any work site (Crocker and Kessler 1982).

### ***Anticipated Noise During Project Operation***

During project operation, the transmission lines would all produce noise, primarily from the corona effect. Under fair weather conditions, corona noise from a 500-kV transmission line would be 33 dBA directly under the transmission line (Idaho Power 2013). This sound level is only slightly above the typical mean rural nighttime ambient sound levels of 30 dBA and would be below the typical mean rural daytime

ambient sound levels of 40 dBA. In the worst-case scenario (a 500-kV transmission line in wet conditions), corona noise would be 58 dBA directly under the transmission line (Idaho Power 2013).

### ***Noise Sensitive Areas***

A noise sensitive area (NSA) is a location where a state of quietness is a basis for use or where excessive noise interferes with the normal use of the location. Typical NSAs include residential areas, parks, and wilderness areas. There are no NSAs in the Study Area or within 3 miles of the Interconnection Project and none would be affected by the project.

### **Communication Signal Interference**

Continuous radio frequency emissions can be generated during normal operations of substations and transmission lines. These emissions can cause interference to AM radio and television signal reception at nearby properties. Objectionable radio frequency noise is generally a product of unintended sparking but can also be produced by corona (McDonald 2012).

### ***Existing Sources of Signal Interference***

Radio frequency emissions from the Moenkopi to Cedar Mountain 500-kV transmission line have the potential to interfere with radio reception in vehicles traveling on ranch roads under or near the lines.

### ***Anticipated Interference Effects***

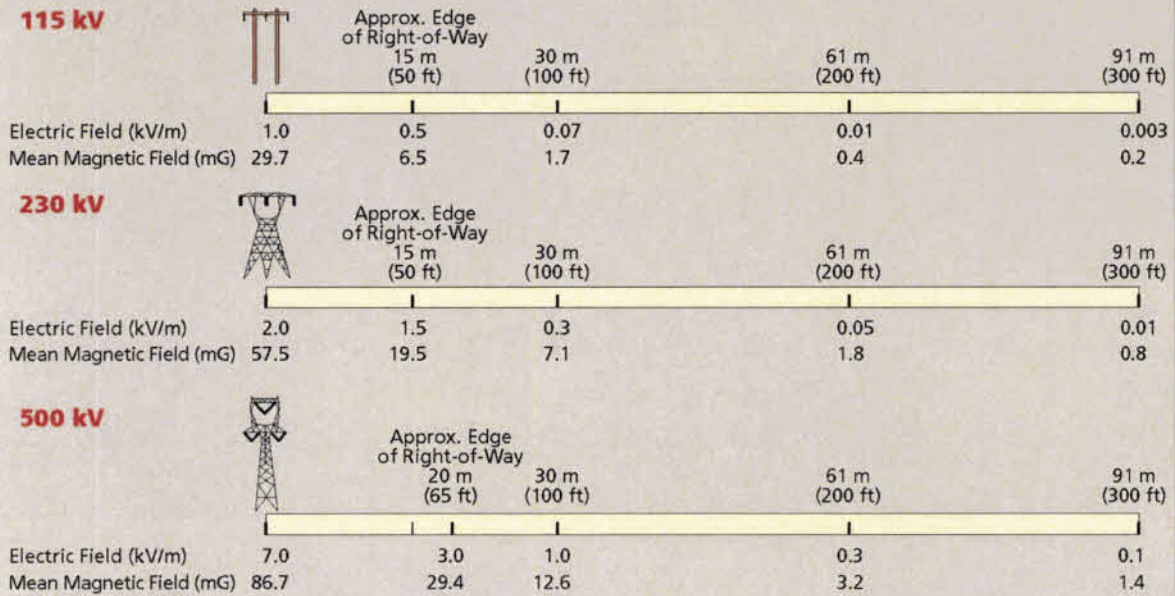
The Interconnection Project may extend any current radio interference on ranch roads that would cross under the proposed generation intertie transmission line, but only for a short distance, and any difference from existing conditions would likely not be noticed.

### **Electric Fields**

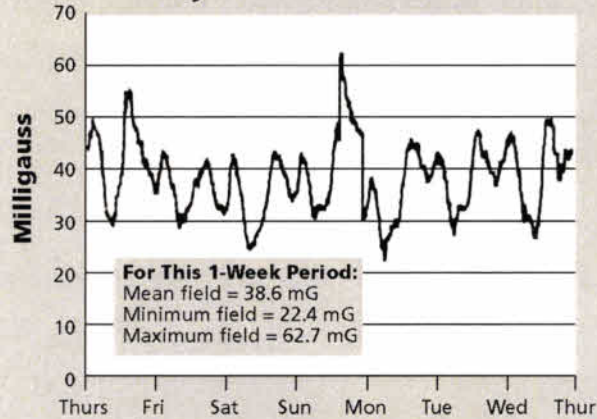
According to the National Institute of Environmental Health Sciences (2002), electromagnetic fields are naturally occurring when any substance has an electrical current running through it, including power lines, electrical wiring, and other electrical equipment. Electric and electromagnetic fields are found naturally occurring in the world in the range of 12 to 150 kV/m. Electric fields created by televisions and other video display units typically occur in the range of 20 kV/m (National Institute of Environmental Health Sciences 2002).

As shown in Exhibit I-1, electric fields and magnetic fields dissipate rapidly as distance increases away from a transmission line. For example, Exhibit I-1 indicates that, for a typical 500-kV transmission line, electric fields occur in the range of 7.0 kV/m directly beneath the line, 3.0 kV/m at 65 feet, 1.0 kV/m at 100 feet, and 0.1 kV/m at 300 feet. Given the rural nature of the Study Area and lack of long-term receptors, levels of electric fields and magnetic fields at these distances would be de minimis.

## Typical EMF Levels for Power Transmission Lines\*



### Magnetic Field from a 500-kV Transmission Line Measured on the Right-of-Way Every 5 Minutes for 1 Week



Electric fields from power lines are relatively stable because line voltage doesn't change very much. Magnetic fields on most lines fluctuate greatly as current changes in response to changing loads. Magnetic fields must be described statistically in terms of averages, maximums, etc. The magnetic fields above are means calculated for 321 power lines for 1990 annual mean loads. During peak loads (about 1% of the time), magnetic fields are about twice as strong as the mean levels above. The graph on the left is an example of how the magnetic field varied during one week for one 500-kV transmission line.

\*These are typical EMFs at 1 m (3.3 ft) above ground for various distances from power lines in the Pacific Northwest. They are for general information. For information about a specific line, contact the utility that operates the line.  
 Source: Bonneville Power Administration, 1994.

Exhibit I-1. Typical electromagnetic field levels for power transmission lines.

## Literature Cited

- Crocker, M.J., and F.M. Kessler. 1982. *Noise and Noise Control*, Volume II. Boca Raton, Florida: CRC Press, Inc.
- Eldred, K.M. 1982. Standards and criteria for noise control; An overview. *Noise Control Engineering* 18(1):16–23.
- Idaho Power. 2013. *Boardman to Hemingway Transmission Line Project, Exhibit X Noise*. Available at: [https://union-county.org/wp-content/uploads/2016/01/24\\_Exhibit-X\\_Noise.pdf](https://union-county.org/wp-content/uploads/2016/01/24_Exhibit-X_Noise.pdf). Accessed April 2023.
- McDonald, J.D. (editor). 2012. *Electric Power Substations Engineering*. Third edition. New York: CRC Press.
- National Institute of Environmental Health Sciences. 2002. *Electric and Magnetic Fields Associated with the Use of Electric Power*. Available at: [https://www.niehs.nih.gov/health/materials/electric\\_and\\_magnetic\\_fields\\_associated\\_with\\_the\\_use\\_of\\_electric\\_power\\_questions\\_and\\_answers\\_english\\_508.pdf](https://www.niehs.nih.gov/health/materials/electric_and_magnetic_fields_associated_with_the_use_of_electric_power_questions_and_answers_english_508.pdf). Accessed June 2023.
- U.S. Environmental Protection Agency. 1981. *Noise and its Measurement*. January 1981. Available at: <http://nonoise.org/epa/Roll19/roll19doc49.pdf>. Accessed June 2023.



# EXHIBIT J. SPECIAL FACTORS

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*As stated in the Arizona Corporation Commission Rules of Practice and Procedure R14-3-219:*

*Describe any special factors not previously covered herein, which applicant believes to be relevant to an informed decision on its application.*

---

## Introduction

This exhibit describes the public involvement program that was conducted for the proposed 1886 Solar Energy Station Interconnection Project (Interconnection Project). These outreach efforts provided information about the Interconnection Project to agencies and community members, and solicited feedback, comments, and information.

## Public Involvement Program Summary

The Interconnection Project team initiated the public involvement program to provide community members and relevant jurisdictions and agencies with the opportunity to provide comments and relay information or potential concerns. The public involvement program followed a comprehensive communication strategy designed to reach stakeholders near the Interconnection Project. The public involvement program included the following items, each described in more detail below: a public notice letter, a newspaper advertisement, a Facebook advertisement, an in-person open house, and a website for the Interconnection Project.

## Interconnection Project Contact Information

Dedicated points of contact for public comments and questions were established for the Interconnection Project. The following mailing address, email address, and phone number were included in all public-facing communications:

1886 Interconnection Project  
1645 S. Plaza Way  
Flagstaff, Arizona 86001  
(928) 288-2634  
1886solar@swca.com

Additionally, the Interconnection Project website included a “contact us” form that, when completed, submits an email directly to a representative of the Interconnection Project team.

## Public Notice Letter

1886 Solar Energy Station LLC (the Applicant) mailed public notice letters to the key regulatory agencies, local officials, Native American tribal contacts, stakeholders, and property owners within 1 mile of the Interconnection Project. In general, the purpose of the public notice letter was to provide

information on the Interconnection Project, request comments, and announce the in-person open house. In total, the mailing list included 44 contacts for the various organizations identified below:

- Arizona Game and Fish Department
- Arizona Public Service
- Arizona State Land Department (property owner)
- Arizona Trail Association
- Babbitt Ranches (property owner)
- Coconino County (including County Supervisors and the Community Development department)
- Coconino National Forest
- Grand Canyon National Park
- Kaibab National Forest
- South Rim Property Owners Association
- U.S. Naval Observatory Flagstaff Station
- U.S. Fish and Wildlife Service

The public notice letter was also mailed to representatives from the following tribes:

- Fort Mojave Indian Tribe
- Havasupai Tribe
- Hopi Tribe
- Hualapai Tribe
- Mescalero Apache Tribe
- Navajo Nation (including the President of the Navajo Nation, the Heritage & Historic Preservation Department, the Division of Natural Resources, and representatives for the Cameron Chapter House)
- Pueblo of Zuni
- San Carlos Apache
- Yavapai-Apache Nation

The public notice letter was mailed on June 2, 2023. A copy of the public notice letter is included as Exhibit J-1.

## **Newspaper Advertisement for the In-Person Open House**

The Interconnection Project team placed a legal advertisement in the *Arizona Daily Sun*, a newspaper of general circulation in the vicinity of the Interconnection Project, on June 9 and 16, 2023. According to *Arizona Daily Sun* staff, the newspaper has a subscriber circulation (combined print and digital) of approximately 6,500; the *Arizona Daily Sun* estimates it has 225,000 unique website users per month. The purpose of the newspaper advertisement was to announce the Interconnection Project, provide notice of the in-person public open house (scheduled for June 20, 2023), provide opportunities for public



comment, and provide key contact information for the Interconnection Project team. The newspaper advertisement also included a website address where additional information about the Interconnection Project was available.

A copy of the newspaper legal advertisement and its proof-of-publication affidavit are included as Exhibit J-2.

## **Facebook Advertisement for the In-Person Open House**

A Facebook advertisement for the Interconnection Project and June 20, 2023, open house was run from June 13 to June 20, 2023. The target area for this advertisement included a buffer around the Interconnection Project that included a portion of U.S. Route 180 near the Interconnection Project. The purpose of the Facebook advertisement was to announce the Interconnection Project and provide notice of the in-person public open house (scheduled for June 20, 2023). Individuals that clicked the advertisement were directed to the Interconnection Project website where additional information about the Interconnection Project was available. Facebook advertising metrics indicate that the advertisement reached 2,101 unique accounts, was clicked on eight times, and received zero reactions or comments.

A copy of the Facebook advertisement is included as Exhibit J-3.

## **In-Person Open House**

The Interconnection Project team hosted an in-person open house for the Interconnection Project on June 20, 2023, in Flagstaff, Arizona. The meeting used an informal “open house” format allowing community members to attend at their convenience, review displays, and speak with members of the Interconnection Project team.

Materials provided at the open house included a set of 11 posters (Exhibit J-4). The poster information included a description of the Interconnection Project, a summary of the Arizona Corporation Commission’s Certificate of Environmental Compatibility process, information on land use and major permits, and information on how to learn more about the Interconnection Project and submit comments. A photograph from the open house is included as Exhibit J-5. An official sign-in sheet was available to record attendance (Exhibit J-6), and comment forms were also available (Exhibit J-7). Four members of the public attended the open house.

## **Project Website**

The Interconnection Project team created and maintained a website dedicated to the Interconnection Project (<https://www.swcavirtualpublicinvolvement.com/1886-solar>) to provide stakeholders with current information on the Interconnection Project. The website was initially launched on June 1, 2023 ahead of the June 20, 2023 open house. The website included the Interconnection Project overview, information on the in-person open house, a discussion of the Arizona Corporation Commission Certificate of Environmental Compatibility permitting process, and a comment submittal form. The website allowed interested parties to visit and review the materials at their convenience. A copy of the website information is included in Exhibit J-8.

## Public Comment

Throughout the public involvement program, the Interconnection Project team solicited comments from the public. As of July 2023, the Interconnection Project received the following public comments:

- A representative for Babbit Ranches provided a written comment at the open house on June 20, 2023. The comment was supportive of the Interconnection Project, noting the benefits of clean energy (see Exhibit J-7).
- The San Carlos Apache Tribe replied to the open house invitation letter July 7, 2023, indicating that they do not have any issue with the Interconnection Project (see Exhibit J-9). The San Carlos Apache Tribe provided their reply on a Section 106 tribal consultation form. The Applicant notes that, although the San Carlos Apache Tribe provided their reply using a Section 106 form, the formal Section 106 consultation process has not been initiated. Section 106 consultation with Native American tribes will be occur as part of the NEPA process.



June 2, 2023

Dear Community Member:

The purpose of this letter is to introduce you to Stellar Renewable Power's (Stellar) proposed 1886 Solar 500-kilovolt (kV) Interconnection Project (Project), in unincorporated Coconino County, Arizona. The Project involves a new, approximately 5-mile-long, 500-kV generation intertie (gen-tie) transmission line that would connect Stellar's planned 1886 Solar Energy Center to the regional electric grid at a planned Arizona Public Service (APS) switchyard along the existing Moenkopi to Cedar Mountain 500 kV transmission line. The 1886 Solar Energy Center would include a solar/photovoltaic generating facility and battery energy storage system, each with a capacity of up to 500 megawatts (MW). The Project would be approximately 30 miles northwest of Flagstaff; the proposed route is shown on the enclosed map.

The Arizona Corporation Commission (ACC) and Arizona Power Plant and Transmission Line Siting Committee (Line Siting Committee) are the state permitting authorities for new transmission lines. Stellar Renewable Power plans to apply for a Certificate of Environmental Compatibility from the ACC and Line Siting Committee for the proposed Project (i.e., the 500-kV gen-tie).

Stellar is hosting an in-person Project open house, where the community can learn more about the proposed infrastructure. Representatives from Stellar Renewable Power and SWCA Environmental Consultants will be present to explain the Project and answer questions. We welcome your attendance at the following location, date, and time:

Doubletree Hotel – (Coconino Room)  
1175 W Route 66, Flagstaff, AZ 86001  
June 20, 2023  
5:30 PM – 7:00 PM

In the meantime, please visit our Project website at: <https://www.solarinterconnect.com/1886-solar>.

We welcome your input and questions. Please do not hesitate to reach the Project Team at the contact information below:

1886 Solar 500 kV Gen-Tie Project  
c/o SWCA Environmental Consultants  
1645 S Plaza Way, Flagstaff, AZ 86001  
Project Phone Number: (928) 288-2634  
Project Email: [1886solar@swca.com](mailto:1886solar@swca.com)

Sincerely,

*Dann G. Hazle*

Dean Hazle, Northern Arizona Planning Team Lead, SWCA Environmental Consultants



**1886 Solar 500-kV Interconnect Project**

**Reference Features**

- APS 500-kV Switchyard
- Existing 500-kV Transmission Line
- Highways
- Roads

**Project Features**

- 1886 Solar Energy Center
- Project Substation

**CEC Features**

- 500-kV Gen-Tie

Coconino County, AZ  
Unincorporated Area  
East of Route 66, AZ 86001  
This PDF is for informational purposes only. It is not a legal document.  
SWCA Environmental Consultants  
1645 S Plaza Way, Flagstaff, AZ 86001  
Phone: (928) 288-2634  
Fax: (928) 288-2635  
www.swca.com

1886 Solar 500-kV Generation Intertie Transmission Line Project – Project Overview Map

### Exhibit J-1. Public notice letter (June 2023).

\*\*\* Proof of Publication \*\*\*

STATE OF INDIANA ) ss.  
County of Lake

SWCA Environmental Consultants - Legals  
Dean Hazle  
1645 S PLAZA WAY  
FLAGSTAFF AZ 86001

ORDER NUMBER 132208

I, Abrianna Sims, being first duly sworn deposes and says: That I am the legal clerk of The Arizona Daily Sun, a newspaper published at Flagstaff, Coconino County, Arizona; a copy of which is hereunto attached, was first published in said newspaper, and that said notice was published in the regular and entire issue of the paper during that period and times of publication, and was published in the newspaper proper and not in the supplement.

A. Sims  
SIGNATURE

Section: Legals  
Category: 999 Public Notice  
PUBLISHED ON: 06/14/2023, 06/16/2023

TOTAL AD COST: 191.61  
FILED ON: 6/16/2023

Subscribed and sworn to before me this 16 day of June, 2023.

Dawn Renee Heili  
Notary Public



**1886 Solar 500 kV Interconnection Project Open House**  
Stellar Renewable Power (Stellar) invites you to learn about and provide input on its proposed 1886 Solar 500 kilovolt (kV) interconnection Project (Project) in unincorporated Coconino County, Arizona. The Project involves an approximately 5-mile-long, 500 kV generation intertie transmission line that would connect Stellar's planned 1886 Solar Energy Center to the regional electrical grid at a planned Arizona Public Service switchyard. The Project would be approximately 30 miles northwest of Flagstaff and east of U.S. Route 180. Stellar plans to file an application for a Certificate of Environmental Compatibility (CEC) and present the Project at a hearing before the Arizona Power Plant and Transmission Line Siting Committee (Committee). If approved by the Committee, the CEC will then be presented to the Arizona Corporation Commission for their consideration and final decision. Stellar invites you to attend an open house meeting to learn more about the Project. You will be able to speak one-on-one with team members, ask questions, and provide input. The meeting will be held at the following location, date, and time:  
DoubleTree by Hilton Flagstaff (Coconino Room)  
1175 West Route 66  
Flagstaff, Arizona 86001  
June 20, 2023  
5:30 PM - 7:00 PM  
Additional information about the Project is available at the Project website: <https://www.swcavirtualpublicinvolvement.com/1886-solar>. Stellar welcomes public comment throughout the CEC process. Questions and comments can be submitted using one of the following options:  
Email: 1886Solar@swca.com  
Telephone: (928) 288-2634  
Mail: 1886 Solar 500 kV Interconnection Project  
c/o SWCA Environmental Consultants  
1645 S Plaza Way  
Flagstaff, AZ 86001  
6/14, 6/16 132208

Exhibit J-2. Newspaper legal advertisement and proof-of-publication affidavit – published in the Arizona Daily Sun (June 14 and 16, 2023).





**SWCA Environmental  
Consultants**

Sponsored ·



We want to hear from you regarding Stellar's proposed 1886 Solar Energy Center Interconnection Project, in Coconino County, AZ. Click to learn more about the open house and share your comments.



**1886 Solar Energy Center  
500 kV Interconnection Project**

**Project Open House**  
June 20, 5:30 – 7:00 PM

**DoubleTree Hotel – (Coconino Room)**  
1175 W Route 66, Flagstaff, AZ 86001

For more information, visit our website at:  
<https://www.swcavirtualpublicinvolvement.com/1886-solar>

swcavirtualpublicinvolvement...  
**1886 Solar 500-kV Project**  
1886 Solar ProjectThis w...

**Learn more**

Like

Comment

**Example 1 of 5**

Exhibit J-3. Open house Facebook advertisement (June 2023).



# 1886 Solar Energy Station Interconnection Project

## Public Open House

*Welcome – please sign in*

## Stellar Renewable Power

- Stellar Renewable Power (Stellar) is a renewable energy company based in Dallas, TX.
- Stellar has experience at every stage of developing renewable energy projects (e.g., planning, designing, permitting, constructing, and operating), including in Arizona.
- Stellar's vision is to build a world-leading renewable development platform to accelerate the transition to a carbon free future.
- Stellar has a project development pipeline over 4.5 GW across the U.S.



June 2023

Exhibit J-4a. In-person open house welcome sign and presentation boards (June 2023).



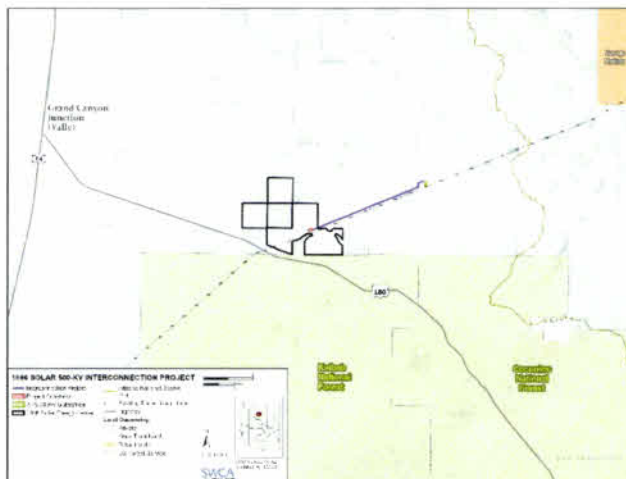
# 1886 Solar Energy Station

- The 1886 Solar Energy Station will be a solar photovoltaic generating facility and battery storage system, each with up to 500 MW of power.
  - Proposed on 3,600 acres of private property (Babbitt Ranches), east of U.S. Route 180 in Coconino County.
  - Wildlife-friendly design utilizing fencing and migration corridors.
- Project Components
  - Arrays of solar photovoltaic panels to generate electricity
  - Low-voltage (e.g., 34.5 kV) collection lines
  - Inverter stations
  - Energy storage system made of lithium-ion batteries in a contained facility.



June 2023

# Project Location and Setting



- Private property in Coconino County
- Arizona State Trust land (managed by the ASLD)
- City of Flagstaff ~30 miles southeast
- Northeast of U.S. Route 180
- Other nearby public lands: Coconino National Forest, Kaibab National Forest



June 2023

Exhibit J-4b. In-person open house presentation boards (June 2023) (continued).

# 1886 Interconnection Project

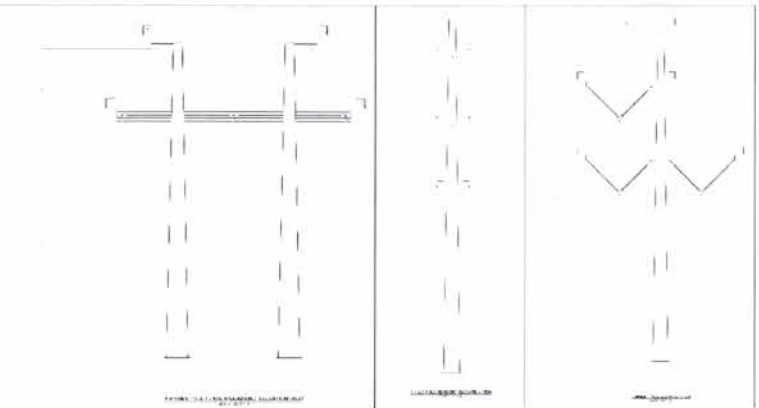
- The 1886 Interconnection Project will connect the 1886 Solar Energy Station to the regional electric grid in northern Arizona and the southwestern U.S.
  - Interconnect to a planned APS switchyard on the Moenkopi to Cedar Mountain 500 kV line.
- The 1886 Interconnection Project consists of a 5-mile-long, 500 kV generation intertie transmission line.
  - The Project substation will increase the voltage from the 1886 Solar Energy Station to match the Moenkopi to Cedar Mountain line voltage (i.e., 500 kV).
  - 250-foot-wide right of way
  - Parallels existing 500 kV transmission lines



June 2023

# Transmission Structures

- Structure types:
  - H-frame tubular steel deadend
  - Single-pole tubular steel tangent structures, and
  - Single-pole tubular steel deadend/angle structures
- Planned structure height: ~85 to 140 feet tall
- Planned span length: ~1,200 to 1,700 feet



June 2023

Exhibit J-4c. In-person open house presentation boards (June 2023) (continued).



# Land Use and Local Permitting

- Coconino County approved conditional use permits (CUP) for a project referred to as CO Bar Solar in June 2022.
  - County Zoning: General (G).
    - The "General zone" is a rural land use designation for unincorporated areas of Coconino County.
- Stellar acquired a portion of CO Bar Solar, now referred to as the 1886 Solar Energy Station. The relevant CUP approvals were transferred to Stellar.
- Existing Land Use:
  - Cattle ranching (anticipated to continue on neighboring ASLD sections and Forest Service land).
  - Other renewable energy developments (wind and solar) are planned or under construction on the CO Bar Ranch (Babbitt Ranches).



June 2023

# Certificate of Env. Compatibility

- A Certificate of Environmental Compatibility (CEC) is a state permit required for new transmission lines that operate at or above 115 kV.
- CEC applications are first reviewed by the Arizona Power Plant and Transmission Line Siting Committee at a public hearing.
- The siting committee then recommends to the Arizona Corporation Commission (ACC) whether to approve the CEC, approve it with conditions, or deny it. Subsequently, the ACC makes a final determination on the CEC application.

June – July 2023  
Public outreach

July 2023  
CEC application submittal

September 2023  
CEC hearings

Fall 2023  
CEC decision



June 2023

Exhibit J-4d. In-person open house presentation boards (June 2023) (continued).

# NEPA

- The U.S. Bureau of Reclamation (BOR) is a part owner of the Moenkopi to Cedar Mountain 500 kV transmission line.
  - BOR must approve the large generator interconnection agreement (LGIA) request for the 1886 Interconnection Project to proceed.
- Federal agencies are required by the National Environmental Policy Act (NEPA) to study the environmental impacts of their actions.
  - Prior to acting on the LGIA, BOR must complete an environmental review of the proposed interconnection to comply with NEPA.
  - Stellar anticipates that BOR, as the lead federal agency, will prepare an Environmental Assessment (EA) to assess the environmental effects of the proposed interconnection.
    - The NEPA EA is anticipated to kick off Q4 2023.



June 2023

# Key Environmental Studies

- Biological resources
  - Desktop and field reconnaissance surveys are underway to support the CEC application.
  - Compliance with Section 7 of the Endangered Species Act and Section 401/404 of the Clean Water Act.
- Visual resources
  - Photo-realistic visual simulations of the 1886 Interconnection Project are underway to support CEC application.
- Cultural resources inventory
  - A desktop review of known cultural and historic resources is underway to support the CEC application.
  - Compliance with Section 106 of the National Historic Preservation Act, including tribal consultation.



June 2023

Exhibit J-4e. In-person open house presentation boards (June 2023) (continued).

# Public Comment & Questions

The development team is ready to answer questions:

**Email**

[1886solar@swca.com](mailto:1886solar@swca.com)

**Phone**

(928) 288-2634

**Mail**

1886 Interconnection Project  
c/o SWCA Environmental Consultants  
1645 S Plaza Way, Flagstaff, AZ 86001

*Public comments received before  
September 1, 2023, will be presented  
to the siting committee*



June 2023

Exhibit J-4f. In-person open house presentation boards (June 2023) (continued).





Exhibit J-5. View of in-person open house displays.

June 20, 2023

Stellar Renewable Power 1886 Solar Project  
Open House Sign-In Sheet  
Please write legibly



Full Name	Email Address	Telephone	Want to receive project updates?*
KRISTIN MILLER	KRISTIN.MILLER@SUNCA.COM	(928) 380-3867	PIA
Michael Mongini	mmongini@GustLaw.com	928-699-4381	Yrs
Ariella Gady	acady@ccom.in.az.gov	(928) 606-7085	YES
Michael P Maccanlay	michael.maccanlay@pge.com	(928) 655-4445	Yes
Billy Confasce	bconfasce@babbitt.com	928 853 7253	✓

\*By providing your information, you agree Stellar may contact you at the number you provided above with information about the project in the future. We will not share your information with any 3rd party sources.

Exhibit J-6. In-person open house sign-in sheet (June 2023).



**Stellar Renewable Power  
1886 Solar Project  
Open House  
Comment Form**

*Please write legibly*

Name: Michael Mongini  
Affiliation: Bobbitt Ranches - Local Flagstaff  
Email: mmongini@custlaw.com  
Phone: 928-699-4381  
Address: 302 N. Verde St  
City Flagstaff State Az Zip 86001

Comment:  
APS - Stellar Renewable Power Project  
is a wonderful low carbon footprint, and  
long term supply of clean energy. The  
500-KV Line is necessary to accomplish  
the carbon free clean energy project.  
The new 500 KV line has limited to  
no visual impact, where shown on the plan.

**Exhibit J-7. In-person open house comment form (June 2023).**



# 1886 Solar Project

This website provides information on the development of the 1886 Solar 500-kV Interconnection Project in Coconino County, Arizona.

## Project Overview

Stellar Renewable Power (Stellar) is planning to develop the 1886 Solar 500-kV interconnection Project (Project) in Coconino County, Arizona. The Project involves a new, approximately 5-mile-long, 500-kV generation intertie (gen-tie) transmission line that would connect Stellar's planned 1886 Solar Energy Center to the regional electric grid at a planned Arizona Public Service (APS) switchyard along the existing 500-kV Moenkopi to Cedar Mountain transmission line. The new 500-kV gen-tie line will have a 250-foot right-of-way. The 1886 Solar Energy Center involves solar (photovoltaic) generating facility and battery energy storage system, each with a capacity of up to 500 megawatts (MW). The Project would be approximately 30 miles northwest of Flagstaff; the proposed route is shown on the map below.

In June 2022, Coconino County approved conditional use permits (CUP) for a project referred to as OO Bar Solar. In August 2022 Stellar acquired a portion of OO Bar Solar from the original developer; the portion Stellar acquired is referred to as the 1886 Solar Energy Center. The relevant CUP approvals were transferred to Stellar. Prior to starting construction, the Project will require other major environmental approvals including a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission and an environmental assessment (EA) from the U.S. Bureau of Reclamation (USBOR). Arizona state law requires a CEC for new transmission lines that operate at 75 kV or above and are longer than one mile. The USBOR is a part owner of the Moenkopi to Cedar Mountain 500kV transmission line, the point of interconnection for the Project. The USBOR must complete an environmental review of the proposed interconnection in compliance with the National Environmental Policy Act of 1969 (NEPA) prior to approving the Project's interconnection request. Stellar expects USBOR to prepare an environmental assessment for the Project to assess the environmental effects of the proposed interconnection. Stellar aims to start construction on the 1886 Solar Energy Center in Q3 2024.

By connecting the PV solar array and BESS to the regional electric grid, the Project will help APS meet its peak electrical load requirements and, in so doing, will lessen the need to dispatch less efficient, non-renewable "peaking resources." By including an energy storage facility, the Project will facilitate the further integration of intermittent generating resources (e.g. solar and wind energy).

Exhibit J-8a. Interconnection Project website.

## Neighborhood Open House

Stellar is hosting a neighborhood open house to provide the public an opportunity to learn more about the Project. If you are interested in learning more, or have questions regarding the Project, we welcome your attendance at the following meeting location:

DoubleTree by Hilton Flagstaff (Coconino Room)  
475 West Route 66  
Flagstaff, Arizona 86001  
**June 20, 2023**  
5:30 PM - 7:00 PM

After Stellar files its CEC application, the Line String Committee will schedule a public hearing. During public hearings, the Line String Committee will consider the CEC application, deliberate, and make a recommendation to the ACC. Event details for the public hearing and instructions regarding how to participate will be posted to this website.



## About Stellar

Stellar is a renewable energy developer headquartered in Dallas, Texas. Stellar has experience at every stage of renewable energy development, including planning, designing, permitting, constructing, and operations. Stellar develops renewable energy projects throughout the United States, with over 4.5 gigawatts (GW) of projects in its development pipeline.



## Certificate of Environmental Compatibility Process

A Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission and Arizona Power Plant and Transmission Line String Committee is required to allow for construction and operation of the 1886 Solar 500-kV Interconnection Project. Stellar plans to file a CEC application with the Arizona Corporation Commission (ACC) in July 2023. The CEC application will include environmental studies to evaluate the proposed Project.

Exhibit J-8b. Interconnection Project website (continued).



The Arizona Power Plant and Transmission Line Siting Committee (Line Siting Committee) will hold a public hearing for the Project within 30 to 60 days of the application filing date. Hearings will be held at a venue near the proposed Project. During the public hearings, the Line Siting Committee will consider the CEC application, deliberate, and make a recommendation to the Arizona Corporation Commission.

Key documents and information about the date, time, and location of the CEC hearings will be posted on this website as information is available. CEC hearings are open to the public and will be held as a hybrid meeting with both in-person and virtual attendance options. The Committee typically hears public comment on CEC applications after the first day of hearings, during a designated evening session.

At least 24 hours in advance of the hearing, information including virtual participation links and phone numbers, public health protocols, and any revisions to the hearing schedule will be posted on this webpage. Revisions to the hearing schedule will also be noticed on the [ACC website](#). If the Committee conducts a tour, the route tour and a map will be posted here and on the ACC website. Members of the public may follow the Committee on the tour.

**Leave a Comment**

Name (required)

First Name  Last Name

Email (required)

Message (required)

Exhibit J-8c. Interconnection Project website (continued).



Received from Tribal Admin DL/07/23  
E-mailed 07/07/23 & date  
Scanned 07/02/23 & date

**SAN CARLOS APACHE TRIBE**  
Historic Preservation & Archaeology Department  
P.O. Box 0  
San Carlos Arizona 85550  
Tel. (928) 475-5797, [apachevern@yahoo.com](mailto:apachevern@yahoo.com)

**Tribal Consultation Response Letter**

**Date:** June 07, 2023  
**Contact Name:** Dean Hazle (928) 288-2634/[dean.hazle@swca.com](mailto:dean.hazle@swca.com)  
**Company:** Stellar Renewable Power  
**Address:** 1645 S. Plaza Way Flagstaff, AZ 86001  
**Project Name/#:** 1886 Solar Generation Intertie Transmission Line Project

**Dear Sir or Madam:**

Under Section 106 and 110 of the National Historic Preservation Act, we are replying to the above referenced project. Please see the appropriate marked circle, including the signatures of Vernelda Grant, Tribal Historic Preservation Officer (THPO), and the concurrence of the Chairman of the San Carlos Apache Tribe:

- NO INTEREST/NO FURTHER CONSULTATION/NO FUTURE UPDATES**  
We defer to the Tribe located nearest to the project area.
- CONCURRENCE WITH REPORT FINDINGS & THANK YOU**
- REQUEST ADDITIONAL INFORMATION**  
I require additional information in order to provide a finding of effect for this proposed undertaking, i.e. Project description \_\_\_ Map \_\_\_ Photos \_\_\_ Other \_\_\_\_\_
- NO EFFECT**  
I have determined that there are no properties of religious and cultural significance to the San Carlos Apache Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present.
- NO ADVERSE EFFECT**  
Properties of cultural and religious significance within the area of effect have been identified that are eligible for listing in the National Register for which there would be no adverse effect as a result of the proposed project.
- ADVERSE EFFECT**  
I have identified properties of cultural and religious significance within the area of potential effect that are eligible for listing in the National Register. I believe the proposed project would cause an adverse effect on these properties. Please contact the THPO for further discussion.

We were taught traditionally not to disturb the natural world in a significant way, and that to do so may cause harm to oneself or one's family. Apache resources can be best protected by managing the land to be as natural as it was in pre-1870s settlement times. Please contact the THPO, if there is a change in any portion of the project, especially if Apache cultural resources are found at any phase of planning and construction. Thank you for contacting the San Carlos Apache Tribe, your time and effort is greatly appreciated.

**DIRECTOR/THPO:** [Signature] 06/13/23  
Vernelda J. Grant, Tribal Historic Preservation Officer Date

**CONCURRENCE:** [Signature] 6/22/23  
Terry Rambler, Tribal Chairman Date

**Exhibit J-9. San Carlos Apache Tribe comment letter.**