



MEETING DATE: November 2, 2022

TO: PINAL COUNTY BOARD OF SUPERVISORS

CASE NO.: **PZ-PA-007-22 (Cameron Solar)**

CASE COORDINATOR: Sangeeta Deokar

Executive Summary:

This is a major amendment to the Pinal County Comprehensive Plan to re-designate approximately 888.06± acres of land from Moderate Low Density Residential (1-3.5 du/ac) and Recreation/Conservation to Green Energy Production and Recreation/Conservation to allow a photovoltaic solar power plant north of the City of Coolidge adjacent to the Town of Florence.

If This Request is Approved:

If this major amendment to the Pinal County Comprehensive Plan is approved, the action will allow the applicant to begin the process of rezoning the property to develop a photovoltaic solar energy production facility on 888.06± acres. The approval of this amendment also considers the existing Recreation-Conservation zone south of the project area that aligns with the Gila River open space corridor with its floodplain in Pinal County.

Staff Recommendation/Issues for Consideration/Concern:

Staff recommends approval for the applicant's request.

LEGAL DESCRIPTION: Sections 1, and 2, T05S, R08E, G&SRB&M

TAX PARCEL: 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005

LANDOWNER/AGENT: Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC. (a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant.

REQUESTED ACTION & PURPOSE: **PZ-PA-007-22 – PUBLIC HEARING/ACTION:** Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC. (a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant, requesting approval of a **Major Comprehensive Plan Amendment to the 2019 Pinal County Comprehensive Plan** to re-designate 888.06 ± acres from MLDR (Moderate Low Density Residential) and Recreation/Conservation to Green Energy Production and Recreation/Conservation for a photovoltaic Solar Power Plant, situated in Section 1, Section 2, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

LOCATION: Located north of City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

SIZE: 888.06± acre project area.

STAFF FINDINGS-

PUBLIC COMMENT:

To date two comments have been received in opposition.

PUBLIC PARTICIPATION:

P&Z Work Session:	7/21/2022
BOS Work Session:	8/10/2022
Web posting and 60 day review:	6/10/2022 to 8/12/2022
Citizen Advisory Committee:	9/01/2022
P&Z Commission Meeting:	9/15/2022
Newspaper Advertisement:	Week of 10/3/2022
Web posting:	10/4/2022
Site Posting:	10/10/2022

OTHER REVIEW AGENCY COMMENTS:

As of the writing of this report no agency comment has been received.

PLAN AMENDMENT DISCUSSION:

Request:

The applicant is requesting a major amendment of the Pinal County Comprehensive Plan to amend the Land Use Plan from **Moderate Low Density Residential (1-3.5 du/ac)** and **Recreation/Conservation to Green Energy Production and Recreation/Conservation** on approximately 888.06± acres. The property is currently zoned General Rural (GR) and has been used as active agricultural land with portions that are fallow and also disturbed vacant lands. The project property has an existing commercial agricultural building.

Project Proposal:

The applicant is proposing to construct and operate a photovoltaic (PV) solar generation facility with an energy output of approximately 100 megawatts of solar generation with battery storage facility. The project includes all infrastructure required by a Solar project that includes substations, O&M building, Solar arrays and electrical distribution lines. The proposal intends to interconnect to the APS or the SRP existing transmission lines close to the project area. The project abuts the Gila River along the south edge with the 100 year floodplain. This is proposed to remain as Recreation/Conservation zone with no development. The infrastructure would be laid out with the 100 foot setback after the floodplain zone.

Site data:

The project area consists of active agricultural, fallow and partially disturbed lands. The project area to the south is bordered by the Gila River along with the 100 year flood plain. This portion of the project is the Recreation/Conservation zone. The area is largely unpopulated and

Land Use Designation:

The designations within the Comprehensive Plan for all properties to the site is Moderate Low Density Residential (1-3.5 du/ac) and Recreation/Conservation. This area is surrounded by industrial uses. To the north is the Cross Creek Dairy, and to the south- east is the CEMEX Coolidge Concrete Plant. Southwest Rock Coolidge to the east and Cal Portland to the west. Although the area is zoned residential, this is not a suitable location for any residential development.

Location and Accessibility:

The Project is accessible via multiple routes, including North Attaway Road, East Palmer road, Quail Run Lane, and North Christensen Road. The Union Pacific Railroad, a major freight corridor is located 0.8 mile west of the Project. The Gila River borders the south of the project.

Environmental Studies:

The site is generally levelled with a lack of sensitive biological resources. A canal runs east-west through the northeastern portion of the project owned by the San Carlos Irrigation District. No designated or proposed critical habitat for the federally protected species is known to occur in or within 5 miles of the Project.

The applicant has provided a detailed analysis of existing environmental constraints, which preliminarily show that the site is abutting a riparian area in the southern vicinity of the project. Arizona Game and Fish Department online tool was used and the report showed special status for three fresh water fish species and two terrestrial species identified that are recommended for conservation. No designated critical habitats are within or near the project area. The proposed project also does not anticipate any impacts to endangered species.

Further analysis, study and research will be completed in consultation with US Fish & Wild Life Services and Arizona Game & Fish Department with relevant state and federal laws when the project moves forward in the rezoning process. Mitigation strategies would be required as directed by the Arizona Game and Fish Department if the land-use change is approved.

STAFF ANALYSIS AND RECOMMENDATION:

After a detailed review of the request, Pinal County Comprehensive Plan and Pinal County Development Services Code, staff recommends **approval** for the land use change. Following are the reason for supporting the land-use amendment:

1. Remote location, sparsely populated with homes
2. Project Area is surrounded by industrial land uses and the Green Energy Production land use designation seems compatible with surrounding land uses.

However, in addition to staff comments, should the Citizen Advisory Committee find, after the presentation of the applicant and together with the testimony and evidence presented at the public hearing, that this Major Comprehensive Plan amendment is needed and necessary at this location and time, will not negatively impact adjacent properties, will promote orderly growth and development of the County and will be compatible and consistent with the applicable goals and policies of the Pinal

County Comprehensive Plan, then staff recommends that the Citizen Advisory Committee forward **PZ-PA-007-22**, to the Planning and Zoning Commission with a favorable recommendation. If the Citizen Advisory Committee cannot find for all of the factors listed above, then staff recommends that the Citizen Advisory Committee forward this case to the Planning and Zoning Commission with recommendation of denial.

CITIZENS ADVISORY COMMITTEE ACTION:

After a detailed discussion and decision, at the public hearing, the Citizen's Advisory Committee voted 8-2 to recommend approval of case PZ-PA-007-22 with the following recommendations:

1. To conserve the open space and connectivity corridors as recommended by the County Staff.
2. New infrastructure needed for the project should be placed such as to avoid crossing any residential areas.
3. Additional surveys would need to be conducted for species found that need to be conserved as per the ERT report.

PLANNING AND ZONING COMMISSION ACTION:

After a detailed discussion and decision, with public input at the public hearing, the Planning and Zoning Commission voted 5-3 to recommend approval of case PZ-PA-007-22 to the Board of Supervisors.

Date Prepared: 10/6/22- SD

PINAL COUNTY PLANNING AND ZONING COMMISSION
(PO NUMBER 247994)

Regular Meeting

9:00 a.m.

Thursday, September 15, 2022

Pinal County Administrative Complex
Board of Supervisors Chambers Historic Courthouse
135 N. Pinal Street, Florence, Arizona

INDEX:

CALL TO ORDER & ROLL CALL: p. 1

PLANNING MANAGER DISCUSSION ITEMS: - None

NEW CASES: No Action

- SUP-005-22 - pp. 2-9
- SUP-006-22 - pp. 9-23

MAJOR COMPREHENSIVE PLAN AMENDMENT CASES:

- PZ-PA-006-22 - pp. Withdrawn
- PZ-PA-007-22 - pp. 55-93
- PZ-PA-008-22 - pp. 94-113
- PZ-PA-009-22 - pp. 113-163
- PZ-PA-011-22 - pp. 163-190
- PZ-PD-048-21 & PZ-043-22 - pp. 191-204
- PZ-PA-049-21 & PZ-PD-049-21 - pp. 204-209
- PZ-042-21 & PZ-PD-042-21 - pp. 24-54

WORKSESSION: Rescheduled

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ORIGINAL PREPARED FOR:
PINAL COUNTY, ARIZONA

1 DEL COTTO: I'm sorry. Yes. I'd like to make a
2 motion to move PZ-PD-042-21 to the Board of Supervisors with a
3 favorable recommendation, with the 6 stipulations listed in
4 staff report.

5 RIGGINS: We have a motion, do we have a second?

6 FLISS: Second.

7 RIGGINS: Who was that? Commissioner Fliss seconds.
8 All those in favor signify by saying aye.

9 COLLECTIVE: Aye.

10 RIGGINS: Any opposed? The motion passes
11 unanimously. And I will remind the presenters who came up to
12 speak to this case, this is a recommendation to the Board of
13 Supervisors, this is not a decision. It's a recommendation.
14 The case will be decided by them when they have their
15 scheduled meeting. So if you wish to follow this up, you need
16 to find out when that is so you can go at that done. Okay.
17 Thank you very much. Does the Commission want to have a 10
18 minute break? Okay, it is 15 minutes till 11, we'll be back
19 at 5 minutes till 11.

20 [BREAK]

21 RIGGINS: So with that, I will reconvene the regular
22 meeting of the Pinal County Planning and Zoning Commission on
23 September 15th, and our first case, we are moving into Major
24 Comprehensive Plan Amendments, the first case on our agenda,
25 PZ-PA-006-22 has been withdrawn, so it is off the agenda and

1 we will be moving on to our first case, which is case PZ-PA-
2 007-22.

3 DEOKAR: So once again, good morning, Sangeeta
4 Deokar, presenting the next case, which is as mentioned by the
5 Chair. I would like to just give an overview for this year's
6 Major Comprehensive Plan Amendments. We had the 60 day period
7 ending 12th of August, and we had the Citizens Advisory
8 Committee meeting, which happened on the 1st of September.
9 Today is the next public hearing, which is the Planning and
10 Zoning, and the last phase for this Major Comprehensive Plan
11 Amendment ends October 26th, which is the Board of Supervisors
12 hearing. This year we had five applications, and the first
13 one which is the Cielo Solar and Storage Project, was
14 withdrawn by the applicant. And the second one is the Cameron
15 Solar Project. The third one - the next three are County-
16 initiated Major Comprehensive Plan Amendments. PZ-PA-008 is
17 regarding implementation and applying updates to Plan's Minor
18 Comprehensive Plan Amendment regulations, and that is for
19 State Land. I'm sorry, that was the JLUS. PZ-PA-009-22 is
20 the Special District for State Lands. The last one is the
21 wind energy, which is PZ-PA-011-22, which is to be included in
22 our Comprehensive Plan document. So I'm directly going to the
23 item number two, which is PZ-PA-007-22, which is the Cameron
24 Solar Project. This proposal is by Aurora Solar LLC, a
25 subsidiary of Avengrid Renewables LLC, proposing a Major

1 Comprehensive Plan Amendment to redesignate 888.06 acres from
2 Moderate Low Density Residential and Recreation and
3 Conservation to Green Energy Production and
4 Recreation/Conservation. The area, again, as mentioned, is
5 888 acres and location is half mile north of the City of
6 Coolidge. Owner is the Church of Jesus Christ of Latter day
7 Saints. Applicant is Kristen Goland from Aurora Solar, LLC.
8 This is the location map showing where the project is. You
9 can see that it is just south of Florence, north of Coolidge,
10 and it's in between the unincorporated area of Pinal County.
11 And I will further zoom down to sharing the Comprehensive Plan
12 designation, showing that it is MLDR, which is Moderate Low
13 Density Residential and Recreation/Conservation zone.
14 Proposal is for a Green Energy Production for a solar
15 facility, and the designation would be two designations, which
16 does consider the Recreation/Conservation zone to remain the
17 same, with minor changes. This is the vicinity map showing
18 what I just talked about, this being an area which is kind of
19 in between the incorporated areas of north, which is Florence.
20 The south is Coolidge, but immediate surroundings is General
21 Rural. And one can see that it is kind of a pocket. The east
22 portion, again, northeast is Florence, eastern portion is
23 private land, unincorporated Pinal. West is the Gila River
24 Community again, which is shown in yellow. Immediate north is
25 residential, CR-3 zoning, which is a portion of that abutting

1 that parcel. This is the aerial map showing the area which
2 has been agricultural land and was disturbed - I mean, fallow
3 and some of the areas have been active, actively used.
4 Surrounding land uses are showing a pretty much open spaces
5 and not really surrounded with residential community.
6 Northeastern portion only, which is part of the Town of
7 Florence, is platted currently. Immediate north is a dairy
8 farm, which I will show you moving forward in the maps. So
9 this is other - further zooming into the zoning, CR-3 to the
10 north, GR immediate surroundings. The incorporated area has
11 been shown in orange hatched. Florence to the north, south is
12 Coolidge. We have some State Land to the southern portion and
13 this map actually shows the existing infrastructure, along
14 with the Recreation and the Conservation zone to the south of
15 this project. Just like to point out, the way this parcels
16 are sitting is kind of showing the existing infrastructure
17 with the 115 kV lines, 220 kV lines, and we have the
18 substations shown in black circles. The hatched portions are
19 the incorporated areas. Most of the portion to the south is
20 the Recreation and the Conservation zone. The black line is
21 indicating the project boundaries, and the yellow line is
22 showing where the development would be happening. And let me
23 go to the next map to show some aspects of this location. The
24 parcels to the north of this red area is what I'm saying is
25 the project area. This is the portion that is the Gila River

1 flood zone which is abutting this parcels. If one looks at
2 the current Comprehensive Plan existing land use designation,
3 one can see that the northern portion, the total area of the
4 project is Moderate Low Density, and a portion is, to the
5 south is the Recreation and Conservation zone. This map is
6 actually trying to kind of amend the land use designation,
7 especially the open space redesignation portion, which shows
8 that currently those lines are not following the Gila River
9 floodplain map, which is the GIS map which is in currently for
10 the County. A portion of that is going to be kind of proposed
11 for the Recreation and Conservation, and a portion of that is
12 going to be proposed for Moderate Low Density Resident -
13 sorry, for the Green Energy Production. So what this map is
14 showing in that oval area is the portions that are trying to
15 map or follow the lines for this Gila flood river zone. So
16 what this does is we are ensuring that the conservation and
17 the open space and reservation zone would remain the same. It
18 would follow - it would have the 100 year floodplain secured,
19 and the applicant would be allowed, if the Commission moves
20 forward with a positive recommendation, further 100 feet of
21 buffer beyond the floodplain that would need to be observed by
22 the project. This is the site plan showing the portion
23 further, kind of clearly showing that the southern portion,
24 the way it has been shown, that a portion on the western
25 portion is going to be converted to the conservation zone, and

1 a portion in brown is going to be converted to the Green
2 Energy portion, which is following the Gila River 100 year
3 floodplain as per or GIS maps. And there is no change to the
4 portion that is shown as no change, and those are the parcels
5 at the southern portion of this project boundary that are
6 going in for those changes. And obviously, of course, the
7 northern portion going in for the Green Energy Production.
8 The site layout shows the way the panels are going to be laid
9 out, and this is a draft of this, which is, has a substation
10 on the eastern boundary of this, access is from the eastern
11 portion, and north and east. Project overview. The current
12 conditions for this, this is active and fallow agricultural
13 area, relatively flat topography. Location of this Gila River
14 and 100 year floodplain, southeast portion of the project
15 area. Proximity to existing electrical and transmission
16 infrastructure substations, which are APS, SRP and Valley Farm
17 substation. The proposal is a standard solar farm generation
18 of 100 megawatt of battery storage to include solar array of
19 PV modules, single axis tracking system, battery energy
20 storage system, O&M building, which is the operations and
21 maintenance, and the associated infrastructure associated with
22 this facility. Timing of development is expected operation
23 date is December 2025. Some discussion items from an
24 environmental perspective and context, is that the project
25 area's located in the vicinity of wildlife habitat

1 connectivity feature. ERT report has been added in your
2 packets, and the southeast portion has again been identified
3 as the riparian area. Implications on land use planning. We
4 have been talking with the applicant and we would want to
5 ensure that conservation of open space would be considered and
6 would be incorporated as directed under the Open Space and
7 Trails Masterplan Drainage Design Manual to avoid and minimize
8 impacts to riparian habitats. Recreation and Conservation
9 land use designation to follow the 100 year floodplain line
10 edge of the Gila River as per the Pinal County flood map. The
11 additional 100 feet buffer after the floodplain would need to
12 be maintained. Coordination with State historic preservation,
13 U.S. Fish and Wildlife Services, AZ Game and Fish Department
14 would be required to ensure all wildlife are preserved,
15 including mobility, permeability that is maintained and
16 enhanced. And habitats documented in the vicinity are two
17 habitats, Sonoran Desert tortoise and western burrowing owl.
18 There are other four types of fishes that have been also
19 identified, but they are there only where the water is there.
20 Some discussion items for the urban context. The project area
21 is going to be surrounded with industrial scale operations.
22 I've identified and shown those in red dots, with cement
23 aggregates and concrete operations. We have received no
24 comments from the Town of Florence or any other agencies. No
25 residential development is immediately abutting the project

1 site. There are sparse residences around, except the
2 northeast corner, which is platted, which is part of Town of
3 Florence. We feel that the site is suitable for uses similar
4 to abutting uses, which is industrial and commercial uses.
5 Public responses, no responses from agencies as mentioned
6 earlier. Property owners, we received two letters in
7 opposition. They have been added in your staff reports.
8 Citizens Advisory Committee response, they recommended
9 approval, forwarding it to P&Z 8-2. Staff recommends approval
10 with recommendations per staff report. And I am open for any
11 questions. We also have the applicant. They have a separate
12 presentation to share with you and we can - and right now I'm
13 open for questions first.

14 RIGGINS: Commissioners, questions of the staff
15 report?

16 FLISS: Chair.

17 RIGGINS: Commissioner Fliss.

18 FLISS: Sangeeta, the - we've had this conversation
19 many times now, but one of the same questions that always
20 comes up is where is the electricity going? Does it stay
21 within Pinal County or does it go outside of the County?

22 DEOKAR: I would want the applicant to say, because
23 those are, you know, those are more detailed and they are in
24 processes of this, you know, getting the contracts for the
25 electricity.

1 FLISS: Thank you.

2 RIGGINS: Other Commissioners? I'm certainly going
3 to have several questions, Sangeeta, but I know that you're
4 going to want the applicant to answer them and not yourself.
5 So I will hold up for that portion of the case to begin my
6 questions.

7 DEOKAR: Sure.

8 RIGGINS: So any other questions? Okay, very good.
9 Thank you. Let's go ahead and have the applicant come up.

10 DEOKAR: Thank you.

11 HOFFBUHR: I've already signed in, but for the
12 record my name is Tyler Hoffbuhr with Avangrid Renewables.
13 Address 2701 Northwest Vaughn Street, Portland, Oregon 97210.
14 Good morning, I think it's still morning. Mr. Commissioner
15 and the Commission - or Chairman and Commission. Today we're
16 going to just do a short presentation for you outlining our
17 project and specifically why we've chosen this area and why
18 we've sited in this area, and why we think that the Green
19 Energy is a good use of the property here. To start off, just
20 a quick introduction, as I said my name is Tyler Hoffbuhr, I'm
21 the business developer for the project with Avangrid
22 Renewables. Also here today, we have a few members of our
23 environmental permitting team, Kristen Goland, Marcy Patrick.
24 Not here today, a couple others have been instrumental so far
25 in siting and development would be David Glenn on the

1 Transmission Interconnection Strategy Team, and then also Mark
2 Stacey, director of West Coast Development for our company. A
3 little bit about our company. We've been operating in the
4 United States for over 20 years developing renewable - owning
5 and operating renewable projects. We currently have over
6 eight gigawatts of wind and solar in over 22 states, as shown
7 on the map here with several others under construction. We
8 aren't a fly by night developer that comes in, develops
9 projects and flips projects to some other person to operate
10 it. Our goal is to own and operate our projects for the life
11 of the project. As the second bullet points that says there,
12 we're a stable owner. You know, we have good financial
13 backing and a long track record in the country. Third slide
14 there just kind of drives home that fact of over \$38 billion
15 in assets in operation over 24 states. In particular, you
16 know, with regards to Arizona, in Navajo County we have two
17 wind farms currently that have been operational for over 10
18 years. We also, in Pinal County specifically developed the
19 Copper Crossing wind project several - well it's been probably
20 almost 10 years as well. We owned and operated that for a
21 while until SRP, who's the offtaker for that project and buys
22 the power, decided to purchase that project from us and
23 operate it themselves. And then we also just recently
24 permitted a 200 megawatt solar project located in Navajo
25 County. All right, so as Sangeeta kind of pointed out, our

1 plan is currently proposed to change the Moderate Low Density
2 Residential area and a small portion of what was considered
3 Open Space to Green Energy. And, you know, I think Sangeeta
4 did a good job of pointing out why in particular the open
5 space portion. You know, I just want to clarify that we have
6 absolutely no intention of being within the floodplain of the
7 Gila River and met with Mr. Taylor with the Open Space and
8 Trails Department just to confirm the intent of the
9 Comprehensive Plan with regards to Open Space, and it really
10 was to protect the Gila River floodplain and that, you know,
11 the boundary that as it was drawn up into the currently farmed
12 area was probably not looked at closely when it was originally
13 adopted. So as we discussed this, we also noticed that there
14 is a portion of the floodplain itself that was designated as
15 Moderate Low Density Residential. So instead of just leaving
16 that alone as part of our Comprehensive Plan amendment, we are
17 requesting that that Moderate Low Density Residential within
18 the floodplain be changed to Open Space to protect the Gila
19 River floodplain. The other portion, as I mentioned, is
20 currently farmed. It's not within the floodplain and extended
21 upwards of almost an eighth of a mile up within to the farm
22 field. So as you can see there, that's shown in orange. The
23 owner of the property technically is Farmland Reserve, which
24 is a subsidiary of the Church of Jesus Christ of Latter Day
25 Saints, I just want to make that clarification. All right.

1 So a little bit about the project we're proposing. We're in
2 the very early stages of development with this project. There
3 hasn't been a significant amount of time done on the
4 engineering side of it yet, so a lot of the stuff that I'm
5 going to talk about today is more about why Green Energy and
6 not - I can talk at a high level about the technology and the
7 things that we're proposing here, but site specific, we're
8 very preliminary stages of engineering, so I'll just have to
9 talk at a high level about those things. 100 megawatt solar
10 project with an optional 100 megawatt battery storage system,
11 which is usually required these days by SRP and APS for any
12 new generation that they're accepting. The project itself, as
13 far as why we picked this location, you know, a lot of what we
14 look for in developing new solar projects is obviously we
15 want, one, needs to be sunny and we know it's sunny in
16 Arizona. Two, we want to be somewhere that's close to load,
17 meaning demand for power. And that's a requirement of SRP and
18 APS typically as well. And three, flat sites are ideal
19 because it requires minimal grading and minimal disturbance to
20 the to the land itself as we build the solar facility. And
21 then lastly, we look for locations with similar uses in the
22 surrounding area so it's not overly impactful to the existing
23 uses on the land. And as mentioned, I'll get into a little
24 bit more of, you know, what we're - where this project is
25 located in relation to these other uses in the area.

1 Facilities on the site, you know, in addition to the solar
2 panels, optional battery storage system, the substation, O&M,
3 you will have underground what we call collector lines, which
4 is the - what collects all the power and brings it back to the
5 substation and then delivers it to the grid. And then, of
6 course, the operational and maintenance building where our
7 staff will be housed with the equipment. As far as schedule
8 goes, we're currently, as you know, in the MCPA process. We
9 plan to move into - if it's recommended for approval, go to
10 the Board of Supervisors next month, and then if we're
11 approved there, we would move into the PAD and zoning change
12 approval process. And that's where we, once we get through
13 this process, we would spend a lot more time going into
14 detailed engineering and really start looking at the details
15 of how this project is going to be laid out within the project
16 area. Then moving into 2024, construction permits. Our
17 construction for a project of this size is typically 12
18 months, but can extend out to 18 months, so we typically say
19 12 to 18 months. So we'd be looking at a in-service date of
20 end of 25, as Sangeeta had mentioned. We held a public
21 meeting back on May 2nd, just north of the site in Florence.
22 We had 13 individuals show up, most of them live just
23 northwest of the project in a small community there. Really a
24 lot of good questions. A lot of them were actually pertaining
25 around the improvement of Christensen Road and if we would be

1 improving that road so they had better access to their
2 community. And then, you know, I would say the general
3 consensus was, you know, I think they prefer the way it is.
4 They realize that residential development is expanding within
5 the County and that if they had a choice between solar and
6 residential, that they would all be happier with solar. That
7 seemed to be the general consensus of the people that attended
8 our meeting then. All right, project location. As Sangeeta
9 mentioned, we are just in this unincorporated area, kind of
10 between Coolidge and Florence. The Gil River's to our south,
11 as well as the Hanson Aggregate Facility. Cemex aggregate
12 facility is also to our south, just on the other side of the
13 river, and we have another aggregate facility to our east, and
14 then a dairy farm to our north. We're located just west of
15 Attaway Road, with the northern extent of the project running
16 parallel to Palmer Road. Again, I think I'll move quickly
17 through this because I think Sangeeta covered it pretty
18 nicely. One other component that we look at when we're
19 looking for siting new projects is proximity to transmission
20 lines and customers, and this project was uniquely situated
21 kind of adjacent to an SRP line, which you see running along
22 the north boundary there. We've also got APS to our south,
23 with the Valley Farm substation just a little bit further to
24 the southeast. And then the WAPA, Western Area Power
25 Administration, Coolidge substation just off the map here to

1 our southwest. The land was already all disturbed, except for
2 a very small portion in the northwest corner. So the minimum
3 - the environmental impacts would be very minimal to the
4 existing use of the land. And as I mentioned, you know, while
5 our lease area with the landowner extends into the floodplain,
6 that just happens to be the way the parcels were mapped. We
7 have no intention of actually doing anything in that southern
8 black area within the floodplain, and that would be that gap
9 between the yellow and black would be where we would be
10 designating the land, proposing to move that to Open Space.
11 All right. So why do we like the project? You know, APS and
12 SRP both have very stringent and lofty goals for renewable
13 energy in their portfolio in the next, you know, well
14 foreseeable future, really. You know the retirement of coal
15 plants coming offline in the State and in the region. As it
16 was mentioned earlier, the power coming off of the dams up
17 north is being reduced as a result of lower water levels, so
18 they're looking to replace that power generation and currently
19 looking at primarily wind and solar for those new energy
20 sources. Existing infrastructure makes a project site
21 compatible, as I mentioned before, and the proximity to the
22 load center in Phoenix and the APS and SRP customers, and
23 Commissioner Fliss, I'll get to your question, you know, later
24 but that, you know, really we're targeting customers -
25 targeting utilities that are located in the State here. And

1 the project is absent its sensitive resources and is currently
2 used as agg as previously discussed. Just to help paint a
3 picture of kind of the area and where we're at, you know, and
4 when we mentioned earlier the uses, similar uses in the area,
5 that's the next plant there down south is just off of highway
6 287. It's a pretty large facility just south of Gila River.
7 Off of Viewpoint 3 there, and I'll get to some pictures in a
8 bit, that's the Hanson Aggregate Facility, and that surrounds
9 us kind of that whole south and western portion of the
10 project. There's the other one on Viewpoint 4. Just across
11 Attaway Road is another large rock quarry, a gravel operation.
12 And then most of our boundary to the north is up against the
13 dairy there. So we feel that, you know, as far as things go
14 and being close to load, or customers and where we need the
15 power, that this facility is located in a spot where the
16 existing use of the land is similar to what we're proposing.
17 This is Viewpoint 1 just off Attaway Road, looking at the
18 Cemex facility to our south. This is from Palmer Road,
19 centrally located on the north end of our project, looking
20 north towards the dairy with the manure ponds just off the
21 road there. And then this is off of Quail Run Road which runs
22 partially down through the middle of our site, and dead ends
23 right where the green dot is there on the map on the right,
24 where the Hanson aggregate facility begins. And with heavy,
25 heavy truck traffic in and out of this area all day long. And

1 then this is from the corner of Attaway Road and Palmer Road,
2 looking southeast towards the other facility there. This one,
3 as you get closer on the road, all you see is a very large
4 dirt berm that basically surrounds this facility. So this is
5 a better vantage point just to see off in the distance there
6 the scale of the operation. All right, so why solar. You
7 know, and today you know, really what we're talking about is
8 why solar versus residential as designated in the plan
9 currently. And a couple other things, you know, it's been
10 discussed today is water. You know, that's a big deal in
11 Arizona right now with the Colorado River and the water coming
12 out of there, with the CAP project and the allocations being
13 cut. Based on some information we found, the typical Arizona
14 house consumes one acre foot per year per 3.5 homes. And just
15 some rough calculations, some of the residential developers
16 that were here earlier could probably come up with a better
17 estimation of how many homes would fit in here, but we just
18 assume two acres roughly per lot, and came up with an
19 approximation of 440 homes, roughly, which would equal about
20 123 acre feet of water per year, with one acre foot, as
21 mentioned earlier, being over 300,000 gallons of water per
22 year. The solar facility itself uses very little water. We
23 have - during our operations period, the O&M staff, there
24 would be roughly three to four people working here, and we
25 estimate about 50 gallons a day used on the site. And then we

1 typically will wash the panels twice a year, maybe three times
2 at about a half a gallon per panel per wash. You know, that
3 comes out to about 259,000 gallons per year, which is equal
4 to, including the O&M use of water about 0.8 acres of water
5 per year used for the facility as opposed to 123 for a
6 residential development of the same size. One other advantage
7 with solar, you know, the biggest - one of the biggest
8 benefits for the County itself is the additional property tax
9 revenues generated, which would be upwards of \$10 million to
10 the County over the life of the project. Which most things
11 that bring in tax revenue, or property tax revenue
12 specifically, require additional ancillary services that cut
13 into that money and the solar facility itself doesn't require
14 money for parks or additional police or any of those type of
15 services. So no real additional ancillary services required
16 for our project. We consider ourselves dark sky compliant.
17 Any lighting we do have, which is very minimal, is all
18 downward, down lighting. Again, minimal water usage. During
19 operations, very minimal additional traffic or burden on the
20 roads of the County, with only 3 to 4 people coming and going.
21 And as opposed to residential where we're adding a lot of
22 impervious surfaces, the surface itself on the site will
23 remain native except for the roads. We will do some minimal
24 grading as required, but as I said the site is very flat, so
25 very minimal grading would be required and we would have

1 gravel roads for access, emergency access to the site. And
2 it's - we're quiet. We're kind of a boring, boring neighbor.
3 I mean the facilities, the only noise generation from the site
4 itself, may be from the inverters which are more centrally
5 located within the project. Those inverter noises that that
6 may come up, or the sound generated from those, would only be
7 during operation when the project is operating power, which
8 means the sun's up. So at night there's no noise coming off
9 the project. And just for comparison, the inverter decibel
10 level is around 65 decibel levels, and once you get past about
11 30 to 50 feet, it's almost audible. Compare that with a
12 residential air conditioning unit which is about 75 decibel
13 level. So it's quieter than a residential air conditioner for
14 the inverters. And there's only, you know, like I said we're
15 not very far in the design yet, so I don't know exactly how
16 many there are going to be, but there's only going to be a,
17 you know, a couple that maybe a dozen of them spread out
18 through the site over the 880 acres. And that's all I've got
19 for you. I know you guys are going to have some questions, so
20 I'll hang out. I'm not going to go anywhere. So please,
21 please let me know what you guys want to know.

22 RIGGINS: Thank you very much.

23 HOFFBUHR: You're welcome.

24 RIGGINS: Commissioners, questions for the applicant
25 for the General Plan Amendment? Well, I guess I'll begin with

1 some. Okay. In your travels around Pinal County, because I'm
2 sure you have been traveling around Pinal County, I'm sure
3 you're aware that many of the communities in Pinal County are
4 starting to take a very dim view that permitting any more
5 space for solar facilities. In fact, there's been some
6 incredible pushback from a lot of these communities because of
7 what they see as a absolute takeover of potentially
8 developable and Open Space areas that are valuable to their
9 community for many, many years being turned into a single
10 purpose facility that its lifetime and exactly how it goes and
11 the future is very hard to determine how that will work.
12 Would you agree that's a correct statement?

13 HOFFBUHR: I would agree that's a correct statement.
14 I mean, which part I should clarify? On where it will go, and
15 in what way? What do you mean?

16 RIGGINS: Where what will go?

17 HOFFBUHR: You said with the solar - I'm sorry, I
18 didn't quite understand what you had said, but you said
19 something about the solar and what will happen with it in -

20 FLISS: I believe in the future.

21 RIGGINS: In the future, yes.

22 FLISS: The life of the project.

23 RIGGINS: Yes, exactly, the life of the project.

24 The life of these particular systems that we're putting into
25 the ground.

1 HOFFBUHR: Right. And what the - so I will say
2 that, you know, the typical life of these projects, a standard
3 solar project is about 25 years. So it's a temporary use.
4 You know, the landowner that owns this land wanted to do solar
5 now, because they know that residential at this time doesn't
6 seem right for their land. But it is a temporary use. And at
7 the end of the project's life, we would decommission the
8 project and return the land to the landowner to do what they
9 see fit with the property. So this is not a - that's one big
10 difference, I would say, with residential or some other
11 commercial type use where once you pave it or put in all this
12 infrastructure, it's a very permanent use and our uses, while
13 25 years is not a short period of time, it's not a permanent
14 use, it's more temporary.

15 RIGGINS: And those permanent uses also generate
16 permanent streams of tax revenue for the jurisdictions that
17 they're placed in.

18 HOFFBUHR: That's correct? Yes.

19 RIGGINS: Could you explain to us how Pinal County
20 will receive benefits through tax revenues from this facility?

21 HOFFBUHR: Well, it's mostly through property tax,
22 from what I understand. And that's because as this - when
23 this project's built, which is a multi, hundreds of millions
24 of dollar facility, that will increase the value of the land,
25 therefore increase the tax revenue generated from the property

1 to the County.

2 RIGGINS: Well, I don't believe that's the way it
3 works. I don't believe that's the way it works at all.
4 Beyond the shadow of a doubt, the output of energy that will
5 come from this facility is shielded from any transaction
6 privilege taxes. So the electricity that you sell, you will
7 pay no taxes whatsoever on that revenue stream. And then
8 going down to the County level, the actual taxes that you pay
9 are personal property taxes. However, unlike most personal
10 property taxes for solar facilities, they're a 10 year
11 declining balance, personal property tax. So in 10 years, you
12 lose 10 percent of that tax every year, and in 10 years it's
13 extinguished fully. So the math is a little simple to do it
14 this way, this isn't exactly precise, but something on a 10
15 year declining balance. You could say they paid full personal
16 property tax for five years, more or less. The math isn't
17 perfect that way, but it's kind of that way. So really
18 there's not that much benefit to this County. Now, I'm sure
19 that you have your own workforce, your technicians, your
20 various people that you'll bring here, probably you won't have
21 any outside help hired at all when this is built. So there'll
22 be no benefit to the County in employment. And as we all
23 know, there's very little employment that goes on one of these
24 things once it leaves, and those people are probably going to
25 be getting checks from outside the State also. Usually. So

1 we don't have a situation where we really have economic
2 benefit that we can quantify. One of the reasons why Salt
3 River Project and APS are very much demanding battery power on
4 these facilities is because one thing it does do is it cuts
5 down the amount of power you can generate in the daytime and
6 put in a line because you have to put it back in your battery.
7 And it tends to alleviate somewhat the incredible disruption
8 that's happening to power grids through on/off power
9 generation in the daytime, without consideration of whether
10 the power comes from night. And with the decommissioning of
11 coal plants and other baseline facilities, those are more and
12 more taken care of with very expensive, short term, usually
13 natural gas instant on/instant off gas turbines that are very
14 expensive. So basically what happens is the proliferation of
15 these facilities drastically increases the cost of power when
16 they're put into the grid. These things really aren't
17 opinions, they're facts. There hasn't been a lot of
18 decommissioning of these plants because they're not old enough
19 yet, and exactly how hazardous waste will apply, what runs off
20 these solar panels in their exposure to the sun for 25 years,
21 how it gets into the ground, exactly what the cleanup
22 responsibilities are if the bonding holds up and a shell
23 company isn't established, and the cleanups aren't done.
24 There's so many questions in this without that many benefits.
25 So many residents of Pinal County are - have been totally up

1 in arms in their jurisdictions to stop this. We have so much
2 land in Pinal County that has already been converted over to
3 zoning for this that have not been built on. The acreage is
4 actually phenomenal how much there is, sitting there waiting
5 to see exactly what a heavily subsidized situation that's
6 required to make them all go into existence. But what it's
7 doing to our power grids because of the nature of the
8 generation, and also the absolute lack of turning any revenue
9 back to the jurisdictions that they live in. I don't know
10 exactly how all this is going to go forward, I don't know what
11 the opinions are going to be. There's obviously lots of
12 levels of approvals and meetings and people that have to see
13 this. But I think Pinal County is finding that they don't
14 want to be the residual solar provider to take this kind of
15 power into all the places that don't really benefit us very
16 much, and turn these areas that we're looking for to have
17 valuable economic activities in the future into blighted areas
18 and difficult areas that people don't really wish to be
19 around. It's one thing to put one of these things out a long
20 ways from everywhere, but (inaudible) communities don't tend
21 to like to build up against these, they certainly will be
22 later in the process. And calling a dairy something that's a
23 good neighbor to build around, I came from the East Valley and
24 I'll tell you, the East Valley used to be full of dairies,
25 just full of them, and dairymen like to sell their land to

1 develop into homes just as much as anybody else likes to. And
2 when that ability for that dairy, who's your proposed northern
3 neighbor, when they have the ability to do that, they're going
4 to very much enjoy being in that position to be able to go
5 that direction. And the imposition of your project, here,
6 will be a great detriment to them. And there's already a
7 platted piece across the street from you. And there's a
8 family that's owned the farms to the north of you for - before
9 this, before this portion below the Gila River was the United
10 States. It's a long time. So I would forward to you that in
11 this man's opinion, I don't believe this is a good fit for
12 this place at all.

13 HOFFBUHR: I respect your, I respect your opinion on
14 that matter. And, you know, there was a lot you said and a
15 lot we could discuss with regards to, you know, one, the
16 viability of renewable energy on the grid and that, but you
17 know, with regards to renewable energy and where the country's
18 going with renewables and the State, you know, we are a
19 company looking to meet the demand of the customers. being the
20 utilities, and trying to do it in a responsible way. You
21 know, and I hear what you're saying, I do hear what you're
22 saying. And what we oftentimes find is there's never a
23 perfect answer, there's never a perfect location, and we do
24 the best we can to site what we think is a good location for,
25 A, the community, and B, the customer, being SRP or APS. But

1 beyond that, you know, we're - we are a developer and we're
2 looking to develop renewables and meet the demand of our
3 customer, our government's requirements for more transition to
4 renewables, and that's why we're here today.

5 RIGGINS: Understand. And like so many things
6 political, the favoring of this particular industry and the
7 incredible disruption and massive increases of public utility
8 costs that have been borne by the consumers, are due to the
9 disruption of basic grids and eliminating baseline less
10 expensive power being whatever produces it, clean or fossil.
11 Because baseline works, it works all the time, but this type
12 of power is strictly disruptive. It makes everything,
13 everybody has to respond to it because it's intermittent. So
14 there has to be a backup for it, for all the use, that won't
15 be very profitable because it won't run enough like a baseline
16 unit would. So I forward to you that the political winds, as
17 they are right now, they won't stay the way they are because
18 they generally don't, and we don't know just exactly how it's
19 going to go. But I would suggest, again, and I say it
20 respectfully, that I don't believe this is a good fit for
21 Pinal County.

22 HOFFBUHR: Thank you.

23 RIGGINS: Other Commissioners, any other questions?

24 FLISS: Mr. Chair.

25 RIGGINS: Commissioner Fliss.

1 FLISS: Just what I find confusing is, is that we're
2 calling this renewables and the future of energy, but it only
3 seems for 25 years, and so it's really something that I come
4 up against continuously when thinking about this, is it just
5 seems such a truncated time period, and then what? What
6 happens after 25 years?

7 HOFFBUHR: Well, you're ask - I - really I mean I
8 can't predict the future and what comes next, you know, as far
9 as power generation. There are people a lot smarter than me
10 somewhere looking at this and trying to come up with solutions
11 on efficient ways to generate power that are not disruptive or
12 bad for the environment. But today, where we are today with
13 power generation sources and what's being required by the
14 customers, this is what they're looking at. And in 25 years,
15 yes, maybe you're right. Maybe in the next 25 years, some
16 other technology comes around that's like mind blowing, you
17 know, and makes power generation, you know, clean and simple
18 and meets everybody's needs.

19 FLISS: I'm not suggesting that. 25 years is a very
20 short time period when we're talking about energy.

21 HOFFBUHR: Yeah, I agree. I agree. And I'm
22 hopeful, you know, that that's the case is all I'm saying, is
23 that at some point, you know, there is some magic bullet for
24 how to generate power. But until then, you know, this is
25 where we are and this is what customers are looking for, and

1 this is what we're building, and then at the end of 25 years
2 or the life of the project, you know, if there is nothing
3 else, you know, if we're still building solar and wind, then
4 maybe we repurpose the plant and we keep going. Otherwise,
5 you know, we pack up, you know, we decommission per County,
6 whatever County requirements there are for decommissioning,
7 and pull up and hand the land back over to the landowner to do
8 as they see fit with their property. So, but yeah, I hear
9 what you're saying, and I don't have an answer for that, you
10 know, really. What, 25 years is a short time in the grand
11 scheme of things, and hopefully, you know, with the way
12 technology is today, that that 25 years something comes around
13 that, you know, in the eyes of most people is a better
14 producer of power.

15 RIGGINS: Other Commissioners, questions or
16 discussion items for the applicant? Commissioner Schnepf.

17 SCHNEPF: So the power that's generated from this
18 facility is going to be sold to the utility company, correct?

19 HOFFBUHR: That's right.

20 SCHNEPF: APS or SRP.

21 HOFFBUHR: Yes.

22 SCHNEPF: So from there you have no idea where that
23 power is going to be going to.

24 HOFFBUHR: Within APS and SRP's territory, no.

25 SCHNEPF: So they could ship it out of state, they

1 could keep it local, we don't know.

2 HOFFBUHR: Yeah, typically - yeah, no, I don't have
3 an answer. I can't speak for them.

4 SCHNEPF: In regards to your structure on the
5 property, how is it that you collect the power from the solar
6 panels and distribute it to the substation, or the battery
7 backup? Is that underground? Is that overhead?

8 HOFFBUHR: So each of the tracker arms, it's a
9 single axis tracker setup. Each of the tracker arms, all the
10 panel power is collected there, runs along the tracker arm,
11 and then goes into the inverter. It goes underground, goes
12 into an inverter where the power's converted from DC to AC
13 power, and from each of those inverter locations underground
14 collection cables would run the - would run back to the
15 substation or the battery. You know, there would be some
16 intermediate facility within the substation that sends power
17 to the grid or to the battery.

18 SCHNEPF: So you have no overhead plans for
19 distribution.

20 HOFFBUHR: Not within this facility.

21 SCHNEPF: It's all underground, okay.

22 HOFFBUHR: Now, to get to the grid itself, SRP is
23 adjacent to the project, so if they were the customer, the
24 substation would probably be located to the northwest, there
25 would be a line top along that line. There would be an

1 overhead line that comes into our substation and then back,
2 essentially looping us in to the grid. APS, we would have an
3 overhead segment to go south. Well, there's no overhead over
4 the Gila River, we would probably not do the same either. But
5 like this is, you know, further past the design than we are
6 right now of how or where that power would go.

7 SCHNEPF: Okay.

8 HOFFBUHR: The design specifics.

9 SCHNEPF: Thank you.

10 HOFFBUHR: Yep.

11 RIGGINS: Any other Commissioners? Thank you very
12 much.

13 HOFFBUHR: Thank you.

14 RIGGINS: We'll - it is 10 till 12, but I think
15 we're well enough into this we should try to finish this case.
16 So we'll go ahead at this point and ask if - we'll open the
17 public participation portion of this case and ask if anybody
18 would wish to come up and speak to this. Please come forward.
19 If you could please write your name and address on the log
20 there and then give that to us before you begin your
21 presentation.

22 FELIZ: All right. Just a little nervous, so I
23 won't try to multitask. I'm Ernie Feliz. I live at 1850
24 North Ridgemont Place, Casa Grande, Arizona. My family, I
25 represent my family, which owns Parcel Number 200-30007, a 30

1 acre field at the corner of Palmer and Attaway Roads, which is
2 directly north of this proposed amendment, on the northeast
3 corner. And I wanted to speak in opposition to this amendment
4 on several - for several reasons. First of all, I don't want
5 to be disingenuous about my participation with solar power. I
6 bought a house last year that came with solar panels and it's
7 worked very well for me. So I can see how on an individual
8 basis among people who want this sort of thing, it's just
9 fine. So I don't have a real problem in that regard. My
10 family, thank you, I wanted to take time to tell you, Chairman
11 Riggins, I appreciate your comments regarding your insight on
12 solar power, and just kind of as a correction, my family has
13 owned this - has farmed - began farming in this area between
14 140 and 180 years ago, depending on which part of my somewhat
15 fractured family you might speak to, but - and I helped my
16 father bale hay in this, in that field when I was a kid.
17 Several years ago, we were offered about \$1,000,000 to sell
18 this piece of land, and we have a lot of - there are a lot of
19 partners. It started with my father and his five siblings,
20 and then it's gone down to all of their children now, because
21 my father passed away back in February. So he was the last
22 surviving member of that part of the family. And so with all
23 of these partners, you know, this million dollar prize was not
24 really enough to make a difference in our lives, a significant
25 difference in our lives. And what we decided we wanted to do,

1 specifically because my father was still alive, was we wanted
2 to save this field for something that would be nice if we were
3 going to sell it. He really loves agriculture, he loved
4 agriculture, and farming was a big part of his life. But we
5 decided well if it's going to be something besides that, then
6 we should make it something nice. We wanted to have something
7 nice there, and over the years when we found that this was
8 going to be low density residential, we thought that would be
9 nice enough. So changing this now, even though it's not
10 changing our field, but changing this area, a significant
11 portion of this area to a solar farm, I think will prevent us
12 from having something nice. And it's not something we want
13 for his memory. In the Citizens Advisory Committee there was
14 talk about saving water and how it's so important to do this
15 because it would save a significant amount of water, and I
16 find this to be very disingenuous because if that were the
17 case, if that was the rationale for doing this, why doesn't
18 the County then just come out and change every flat piece of
19 land in the County to solar farm, and then we'd save all kinds
20 of water for everything. Now, that's not really what this is
21 about in my mind, this is about - this is sort of a NIMBY
22 thing, I think, where what we're trying to say is, well if we
23 prove this here, then it doesn't have to go - that's one less
24 solar farm that somebody's going to try and put in our
25 neighborhood. I really question why we're doing this in Pinal

1 County. This project is going to take away a significant
2 amount of land in Pinal County to generate power for what I'm
3 pretty sure is going to be for the Phoenix area. The Phoenix
4 area has a lot of open space. I know that it costs a lot
5 more, but it has its own open space and on some flat land,
6 probably more than Pinal County. So why don't we go do this
7 in Maricopa County? Just a little point I noticed in the
8 graphics, this company has three solar powers, by what I could
9 tell from the graphics. They've done three projects, all
10 right? I don't think that's a very significant amount of
11 projects. . I have questions about, you know, because I just
12 kind of think I'm fighting a losing battle here. I've - I'm
13 kind of late to the party, I missed - somehow I missed the
14 notice of the meeting in May, so I didn't say what - couldn't
15 say then what I'm saying now. But as far as, I'm curious
16 about mitigation for neighboring property owners. I know
17 based on what I've seen, that the County has now for
18 mitigation and how things look out on Highway 287 and Highway
19 87, those projects, nobody wants to live near those projects
20 and if that's the only mitigation that's going to be allowed,
21 then we're going to have the same, really, I think - well I
22 just have to say ugly kind of looking project that you have
23 there. So I'm hoping that, you know, if this is going to go
24 forward, that there's going to be some real mitigation,
25 landscaping, buffers, setbacks. Not the current ones you

1 have. Additional to what you have now. And I'm happy to talk
2 to anybody about what I would like to see. I'm sure the
3 developer won't like to hear it. The close out plan, I don't
4 know, is there a bond? What's going to keep this company from
5 filing bankruptcy and walking away, you know, when it's
6 decommissioned? So I thank you for your time, and I hope I've
7 made an impression on you of some sort. Thank you.

8 RIGGINS: Don't step down yet. Commission Members,
9 any questions of the presenter at all? None being, thank you.
10 Would anybody else like to come up to speak to this? Please.
11 And just, since we are the lunch hour, is anybody going to
12 come up after her? Okay. Thank you.

13 ESSARY: Hi. I'm Kristin Essary. My address is
14 16726 North Christensen Road. I have been living in this part
15 of town for just a little over five months, and before that I
16 was actually in Mesa. And I'm just actually here in
17 opposition to the solar panel farm. Sorry, I'm a little
18 nervous. I just don't see how that is going to add any sort
19 of property value to my property that we live on. I also was
20 not at the meeting in May, I must've missed it. And I just
21 don't see how putting this there is going to add any sort of
22 benefits to the community that I'm in. I don't really - from
23 where my home is, it would be directly overlooking all of
24 these solar panels, and for me, I - that's not something that
25 I just want to wake up to and see every day either. And

1 again, I don't see what benefits it holds to the community or
2 for our property values or anything else for that matter. So
3 I know kind of short and brief and to the point, but that's
4 just basically what I have to say.

5 RIGGINS: Thank you very much. Don't leave.
6 Commission Members, anybody, questions or comments to the
7 presenter? Thank you very much. So does anybody else wish to
8 come up to speak to this? Anybody at all? There none being,
9 we will close the public participation portion of this case,
10 and we will ask the applicant if he wishes to come back up and
11 say anything or not?

12 HOFFBUHR: No, I think - sorry. Tyler Hoffbuhr with
13 Avangrid. I just would like to thank both Mr. Feliz and I'm
14 sorry, did not catch your name - Ms. Essary, for their
15 comments. You know, we appreciate those. You know, with
16 regards to property values, I - there's been not very many
17 studies done on property values with regards to solar and how
18 it's impacted. Some say that they're impactful in a negative
19 way, some say that the impacts are not very much, if any. I
20 would say, you know, in this specific case, you know, what I
21 would look at is more of the location, you know, with regards
22 to property values and the proximity to agate aggregate
23 facilities and the additional impact on property values, as
24 opposed to the current use there. And, you know, and part of
25 the reason we picked this location was just that, you know,

1 that we felt that there would not be significantly more
2 negative impact on property values aside from what's there
3 already, you know with the aggregate facilities. But other
4 than that, just I appreciate your guys' comments, and that's
5 all.

6 RIGGINS: Okay.

7 HOFFBUHR: Yeah, thank you.

8 RIGGINS: Any questions? Commissioner Schnepf.

9 SCHNEPF: What is your idea for the property for any
10 kind of setbacks, fencing, wall? A chicken fence, whatever?

11 HOFFBUHR: I think I can - I think most of that is
12 defined by the County in the regulations on what's required as
13 it pertains to, you know, what would be considered. I think,
14 you know, when we get to the rezoning portion, if we go there,
15 an industrial use and there's regulations by the County, you
16 know. And we've - the site plan we have takes into account
17 all the required County setbacks that are currently designated
18 from property lines, from roads. With the additional
19 dedication of the right of way of Attaway and Palmer and
20 Christensen Roads for the full 150 foot width and the right of
21 way for Attaway, and I think 100 for both Palmer and
22 Christensen. So definitely take those things into
23 consideration and whatever the County proposes we work with.
24 I mean we're not - to date what we've looked at, you know, in
25 more of a proof of concept is that we can certainly work

1 within the County requirements and what you guys require per
2 your regulations.

3 SCHNEPF: But you'd be willing to be mindful of what
4 we heard today from some of the residents on -

5 HOFFBUHR: Yes, we're - I mean, we're not here to,
6 you know, be a bad - we don't want to be bad neighbors. You
7 know, if there's certain things we can do to help alleviate
8 some of these concerns, we're definitely open to have the
9 conversations and listen and see what we can do to come to an
10 agreement. You know, it's no different than, you know, we
11 work with neighbors all the time in our projects, and our goal
12 is to, you know, try to do the best we can do to keep the
13 peace and be good neighbors, as I mentioned.

14 SCHNEPF: Okay, thank you.

15 RIGGINS: And I would just like to mention that, yes
16 indeed, oftentimes the regulations that are in place do
17 establish what the mitigation measures are. However, I think
18 if you poll a great number of people in Pinal County, that
19 they would tell you that the mitigation measures on the
20 existing facilities are next to useless. So yes, what the
21 regulations are, but this is one of the reasons why so many
22 communities are up in arms about the proliferation of these
23 concepts.

24 HOFFBUHR: Yep, no, I hear you.

25 RIGGINS: Any others? Okay.

1 HOFFBUHR: Thank you very much.

2 RIGGINS: Thank you very much. Commissioners, it is
3 a back on us if we have any discussion among ourselves, any
4 questions for staff at this point, or if we're ready to start
5 with a motion.

6 ??: (Inaudible).

7 RIGGINS: Well, they're right there. I try to give
8 enough pauses to where they can jump in if they wish.
9 Anything at all? I can't make a motion, and I - somebody's
10 going to have to decide which direction we go from here.

11 SCHNEPF: I'll make a motion.

12 RIGGINS: Commissioners Schnepf.

13 SCHNEPF: I'd like to move the Planning and Zoning
14 Commission forward case PZ-PA-007-22 to the Board of
15 Supervisors with a favorable recommendation.

16 RIGGINS: We have a motion, do we have a second?

17 DAVIS: I'll second.

18 RIGGINS: Who's seconding?

19 DAVIS: Davis.

20 RIGGINS: Davis, Commissioner Davis seconds. Let's
21 do this as a roll call, because I don't know exactly what to
22 expect here, but I think we should probably do it in that
23 fashion.

24 DAVIS: Commissioner Davis, as a way of explaining
25 the vote, can I do that?

1 RIGGINS: Certainly.

2 DAVIS: I just think as I look at this property, I
3 share a lot of the concerns on solar and the increased
4 applications we're seeing. In this case, I look at the
5 property itself, I think that it's in a location that, you
6 know, a project such as this, 25 years would be suitable and
7 so, like I said, I'll look at the project on an individual
8 basis. And in this case, I think that, you know, I don't see
9 housing as it's zoned now going in any time soon there, that
10 this gives us some value as a County in the meantime. And so
11 with that, I will vote aye.

12 BILLINGSLEY: Commissioner Hardick.

13 HARDICK: I can't resolve in my mind that it is a
14 benefit to the County or the immediate residents of the area,
15 so I would say negative.

16 BILLINGSLEY: Commissioner Fliss.

17 FLISS: No.

18 BILLINGSLEY: Commissioner Lizarraga.

19 LIZARRAGA: Aye.

20 BILLINGSLEY: Commissioner Heaton.

21 HEATON: Aye.

22 BILLINGSLEY: Mr. Schnepf.

23 SCHNEPF: Just a point of notion for myself, is that
24 it is a, as Commissioner Davis says and I agree with a lot
25 that Commissioner Riggins has said, it's an either way

1 situation. It can go one way or another, depending, and
2 there's a lot of this coming into the County that we have to
3 start addressing and looking to the future for. But at this
4 time, with this project, I am going to say aye.

5 BILLINGSLEY: Commissioner Del Cotto.

6 DEL COTTO: And I think I would agree with that as
7 well, mainly in regards to the location and the timeframe that
8 it may take to get a substantial amount of growth around it.
9 So I'm going to also vote aye.

10 BILLINGSLEY: Chairman Riggins.

11 RIGGINS: No.

12 BILLINGSLEY: We have confirmed 5 in the
13 affirmative, 3 for the negative. The motion passes.

14 RIGGINS: Motion passes. Okay. And these
15 Comprehensive Plan amendments will be heard by the Board of
16 Supervisors, so there can be more input towards the concepts
17 as they go forward. It is 10 minutes after 12. Let's make
18 for an hour, I believe, and be back 10 minutes after one. So
19 we'll adjourn for lunch.

20 [Break]

21 RIGGINS: ...15, 2022. We know our five Commissioners
22 are here, could we see who's still with us virtually?

23 HARDICK: Hardick.

24 RIGGINS: Hardick, are you here?

25 HARDICK: I am.

When recorded return to:
Clerk of the Board
P.O. Box 827
Florence AZ 85132

RESOLUTION NO. 2022-PZ-PA-007-22

A RESOLUTION OF THE PINAL COUNTY, ARIZONA, BOARD OF SUPERVISORS APPROVING A MAJOR COMPREHENSIVE PLAN AMENDMENT TO THE 2019 PINAL COUNTY COMPREHENSIVE PLAN AND AMENDING THE COMPREHENSIVE PLAN LAND USE MAP FOR CERTAIN PROPERTIES LOCATED IN UNINCORPORATED PINAL COUNTY BY CHANGING THE LAND USE DESIGNATION FROM MODERATE LOW DENSITY RESIDENTIAL (1-3.5 DU/AC) AND RECREATION/CONSERVATION TO GREEN ENERGY PRODUCTION AND RECREATION/CONSERVATION; IN CONNECTION WITH PINAL COUNTY COMMUNITY DEVELOPMENT DEPARTMENT CASE NO. PZ-PA-007-22

WHEREAS, the Pinal County Board of Supervisors ("Board") is authorized pursuant to Arizona Revised Statutes § 11-805 and Pinal County Development Services Code § 2.170.110 to approve Major Comprehensive Plan Amendments; and

WHEREAS, on May 27, 2022, the Pinal County Community Development Department received an application for a Major Comprehensive Plan Amendment from an applicant representing the owner of certain property comprising approximately 888.06± acres located north of City of Coolidge adjacent to the Town of Florence (Tax Parcel Nos. 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005 situated in Sections 01, 02, T05S, R08E, G&SRB&M, as legally described in the attached Exhibit A (the "Property")) to re-designate approximately 888.06± acres from Moderate Low Density Residential and Recreation/Conservation to Green Energy Production and Recreation/Conservation Land Use designation. (Case No. PZ-PA007-22); and

WHEREAS, on September 15, 2022, the Pinal County Planning and Zoning Commission held a public hearing on Case No. PZ-PA-007-22, after providing notice pursuant to statutory requirements, and following the public hearing voted 5 to 3 in favor of forwarding a recommendation of approval as per staff report, to the Board; and

WHEREAS, on November 2, 2022, the Board held a public hearing on Case No. PZ-PA007-22, after providing notice pursuant to statutory requirements, and considered the application for the Major Comprehensive Plan Amendment.

NOW, THEREFORE, BE IT RESOLVED by the Pinal County Board of Supervisors that the application for the Major Comprehensive Plan Amendment in Case No. PZ-PA-007-22 is hereby approved and the Comprehensive Plan Land Use Map for the Property legally described in the attached Exhibit A is hereby amended by changing the Land Use designation from Moderate Low Density Residential and Recreation/Conservation to Green Energy Production and Recreation/Conservation Land Use designation.

PASSED AND ADOPTED this 2nd day of November, 2022, by the PINAL COUNTY BOARD OF SUPERVISORS.

Chairman of the Board




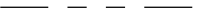
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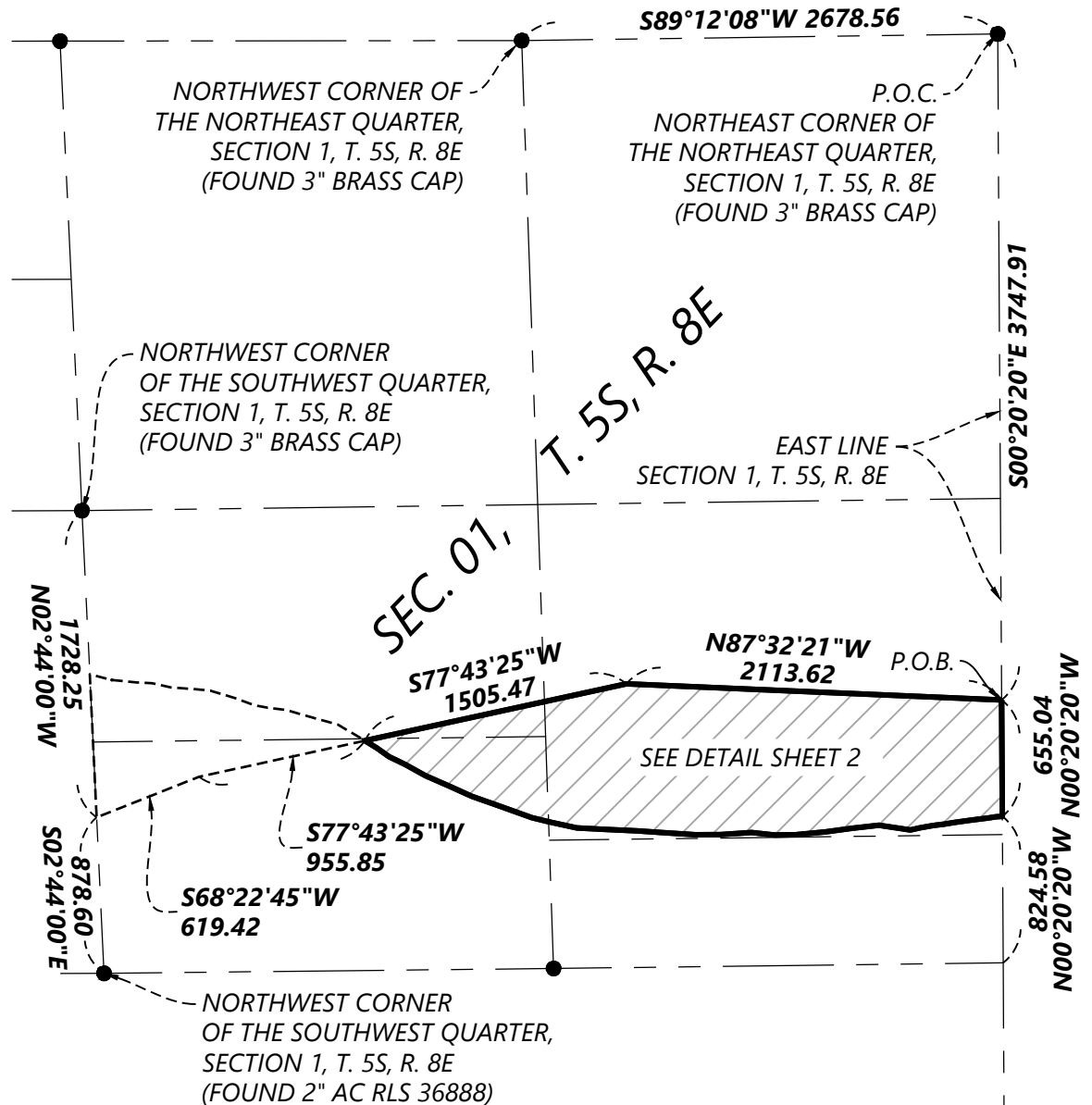
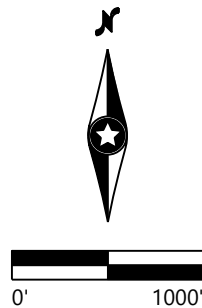
Clerk/Deputy Clerk of the Board

APPROVED AS TO FORM:

Deputy County Attorney

LEGEND

	SUBJECT AREA
P.O.B.	POINT OF BEGINNING
P.O.C.	POINT OF COMMENCEMENT
	BOUNDARY LINE
	FOUND MONUMENT (SEE LABEL)
	SECTION LINE



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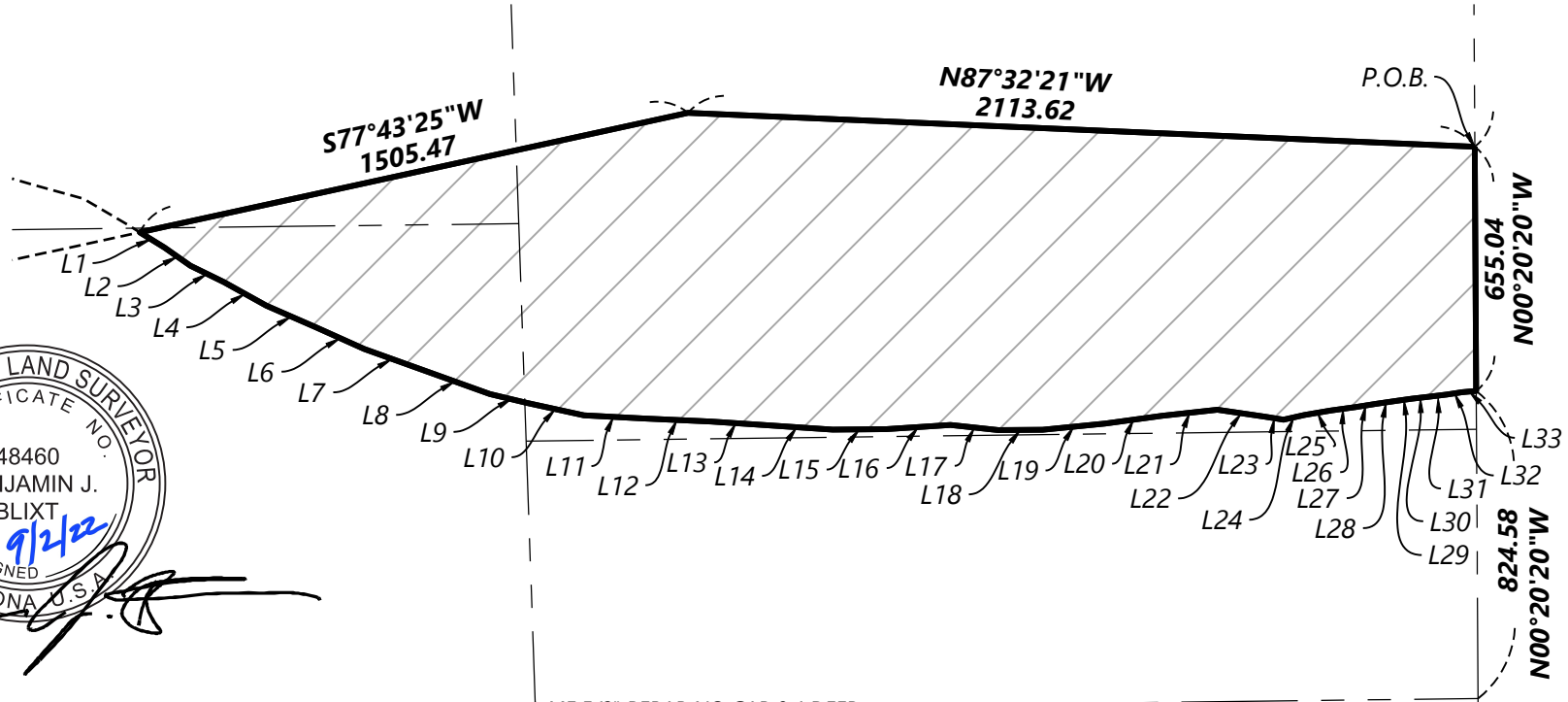
Pinal County, Arizona

Recreation/Conservation to Green Energy Exhibit

DATE: 08/25/2022

SHEET: 01 of 03

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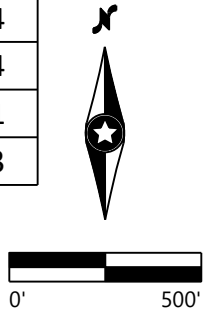


LINE TABLE		
LINE	BEARING	DISTANCE
L1	S58°13'42"E	77.97
L2	S54°58'04"E	85.02
L3	S63°56'01"E	99.45
L4	S61°01'01"E	130.55
L5	S66°32'15"E	145.99
L6	S65°43'30"E	141.50
L7	S70°21'38"E	157.90
L8	S70°16'52"E	200.11
L9	S76°27'37"E	101.87

LINE TABLE		
LINE	BEARING	DISTANCE
L10	S77°46'05"E	157.03
L11	S86°55'58"E	158.42
L12	S87°24'20"E	183.10
L13	S86°15'45"E	133.79
L14	S86°05'51"E	193.28
L15	N89°29'56"E	143.30
L16	N86°13'43"E	173.23
L17	S83°55'00"E	129.32
L18	N89°29'55"E	118.58

LINE TABLE		
LINE	BEARING	DISTANCE
L19	N84°27'34"E	168.67
L20	N82°09'25"E	154.44
L21	N83°47'22"E	148.99
L22	S81°45'20"E	129.98
L23	S80°38'33"E	49.98
L24	N77°22'46"E	57.19
L25	N80°06'21"E	71.89
L26	N82°17'11"E	66.93
L27	N80°44'13"E	55.81

LINE TABLE		
LINE	BEARING	DISTANCE
L28	N81°46'49"E	54.97
L29	N82°18'43"E	41.97
L30	N83°13'06"E	47.54
L31	N83°13'05"E	47.54
L32	N80°53'12"E	41.51
L33	N85°28'43"E	37.73



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Pinal County, Arizona

**Recreation/Conservation
to Green Energy Exhibit**

DATE: 08/25/2022

SHEET: 02 of 03

LEGAL DESCRIPTION:

THAT PART OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST, OF THE GILA AND SALT RIVER MERIDIAN, PINAL COUNTY, ARIZONA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, FROM WHICH THE NORTHWEST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, BEARS S89°12'08"W A DISTANCE OF 2678.56 FEET AND IS THE **BASIS OF BEARINGS** FOR THIS DESCRIPTION;

THENCE S00°20'20"E, ALONG THE EAST LINE OF SAID SECTION 1, A DISTANCE OF 3,747.91 FEET TO THE **POINT OF BEGINNING**;

THENCE N87°32'21"W A DISTANCE OF 2,113.62 FEET; THENCE S77°43'25"W A DISTANCE OF 1,505.47 FEET;
THENCE S58°13'42"E A DISTANCE OF 77.97 FEET; THENCE S54°58'04"E A DISTANCE OF 85.02 FEET;
THENCE S63°56'01"E A DISTANCE OF 99.45 FEET; THENCE S61°01'01"E A DISTANCE OF 130.55 FEET;
THENCE S66°32'15"E A DISTANCE OF 145.99 FEET; THENCE S65°43'30"E A DISTANCE OF 141.50 FEET;
THENCE S70°21'38"E A DISTANCE OF 157.90 FEET; THENCE S70°16'52"E A DISTANCE OF 200.11 FEET;
THENCE S76°27'37"E A DISTANCE OF 101.87 FEET; THENCE S77°46'05"E A DISTANCE OF 157.03 FEET;
THENCE S86°55'58"E A DISTANCE OF 158.42 FEET; THENCE S87°24'20"E A DISTANCE OF 183.10 FEET;
THENCE S86°15'45"E A DISTANCE OF 133.79 FEET; THENCE S86°05'51"E A DISTANCE OF 193.28 FEET;
THENCE N89°29'56"E A DISTANCE OF 143.30 FEET; THENCE N86°13'43"E A DISTANCE OF 173.23 FEET;
THENCE S83°55'00"E A DISTANCE OF 129.32 FEET; THENCE N89°29'55"E A DISTANCE OF 118.58 FEET;
THENCE N84°27'34"E A DISTANCE OF 168.67 FEET; THENCE N82°09'25"E A DISTANCE OF 154.44 FEET;
THENCE N83°47'22"E A DISTANCE OF 148.99 FEET; THENCE S81°45'20"E A DISTANCE OF 129.98 FEET;
THENCE S80°38'33"E A DISTANCE OF 49.98 FEET; THENCE N77°22'46"E A DISTANCE OF 57.19 FEET;
THENCE N80°06'21"E A DISTANCE OF 71.89 FEET; THENCE N82°17'11"E A DISTANCE OF 66.93 FEET;
THENCE N80°44'13"E A DISTANCE OF 55.81 FEET; THENCE N81°46'49"E A DISTANCE OF 54.97 FEET;
THENCE N82°18'43"E A DISTANCE OF 41.97 FEET; THENCE N83°13'06"E A DISTANCE OF 47.54 FEET;
THENCE N83°13'05"E A DISTANCE OF 47.54 FEET; THENCE N80°53'12"E A DISTANCE OF 41.51 FEET;
THENCE N85°28'43"E A DISTANCE OF 37.73 FEET TO SAID EAST LINE;
THENCE N00°20'20"W, ALONG SAID EAST LINE, A DISTANCE OF 655.04 FEET TO THE **POINT OF BEGINNING**.

CONTAINING AN AREA OF 2,356,407 SQUARE FEET OR 54.10 ACRES, MORE OR LESS.



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Pinal County, Arizona





**Recreation/Conservation
to Green Energy Exhibit**

DATE: 08/25/2022

SHEET: 03 of 03



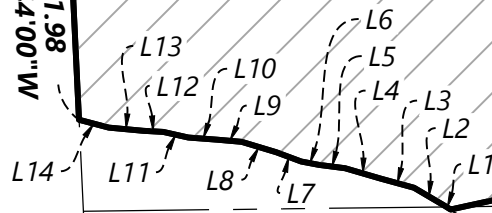
LEGEND

-  SUBJECT AREA
- P.O.B. POINT OF BEGINNING
- P.O.C. POINT OF COMMENCEMENT
-  BOUNDARY LINE
-  FOUND MONUMENT (SEE LABEL)
-  SECTION LINE



SEE SHEET 2

N02°44'00"W
921.98



SEE SHEET 2 FOR LINE TABLE

NW COR. OF THE NE1/4 SEC. 1
(FOUND 3" BRASS CAP)

N89°55'57"E
2597.67

NW COR. OF THE
NW1/4 SEC. 1
(FOUND 3" BRASS CAP)

N. LINE OF THE
NW1/4 SEC. 1

NE COR. OF THE NE1/4 SEC. 1
(FOUND 3" BRASS CAP)

N89°12'08"E
2678.56

N. LINE OF THE
NE1/4 SEC. 1

SEC. 01, T. 5S, R. 8E

E. LINE OF SEC. 1

S00°20'20"E 3747.91

NW COR. OF THE SW1/4 SEC. 1
(FOUND 3" BRASS CAP)

W. LINE OF THE
SW1/4 SEC. 1

1505.47
S77°43'25"W

2113.62
N87°32'21"W

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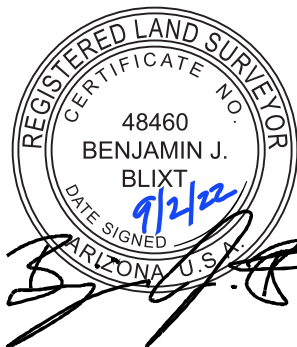
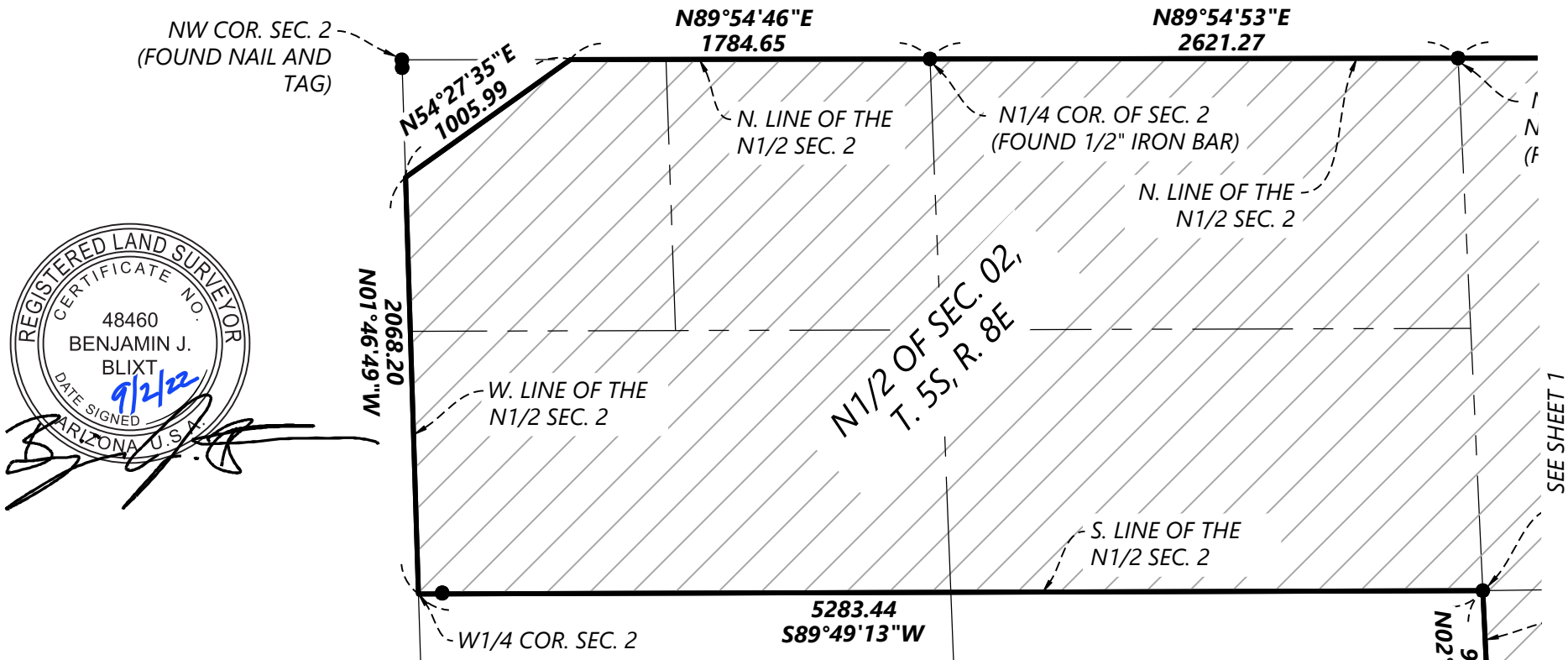
Pinal County, Arizona

MLDR to Green Energy Exhibit

DATE: 08/25/2022

SHEET: 01 of 03

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LINE TABLE		
LINE	BEARING	DISTANCE
L1	N58°13'42"W	33.06
L2	N59°32'09"W	144.06
L3	N74°33'02"W	143.89
L4	N73°48'08"W	154.76
L5	N82°43'56"W	109.73
L6	N79°11'45"W	75.57
L7	N69°38'13"W	111.06

LINE TABLE		
LINE	BEARING	DISTANCE
L8	N73°15'21"W	150.03
L9	N84°47'36"W	99.34
L10	N85°55'37"W	123.91
L11	N77°06'17"W	106.68
L12	N87°08'31"W	84.15
L13	N84°35'38"W	144.06
L14	N75°14'29"W	128.08

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Pinal County, Arizona

**MLDR to Green Energy
Exhibit**

DATE: 08/25/2022

SHEET: 02 of 03

LEGAL DESCRIPTION

THAT PART OF SECTION 1, AND THAT PART OF THE NORTH HALF OF SECTION 2, TOWNSHIP 5 SOUTH, RANGE 8 EAST, OF THE GILA AND SALT RIVER MERIDIAN, PINAL COUNTY, ARIZONA, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, FROM WHICH THE NORTHWEST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, BEARS S89°12'08"W A DISTANCE OF 2678.56 FEET AND IS THE **BASIS OF BEARINGS** FOR THIS DESCRIPTION;

THENCE S00°20'20"E, ALONG THE EAST LINE OF SAID SECTION 1, A DISTANCE OF 3,747.91 FEET;

THENCE N87°32'21"W A DISTANCE OF 2,113.62 FEET;

THENCE S77°43'25"W A DISTANCE OF 1,505.47 FEET;

THENCE N58°13'42"W A DISTANCE OF 33.06 FEET;

THENCE N59°32'09"W A DISTANCE OF 144.06 FEET;

THENCE N74°33'02"W A DISTANCE OF 143.89 FEET;

THENCE N73°48'08"W A DISTANCE OF 154.76 FEET;

THENCE N82°43'56"W A DISTANCE OF 109.73 FEET;

THENCE N79°11'45"W A DISTANCE OF 75.57 FEET;

THENCE N69°38'13"W A DISTANCE OF 111.06 FEET;

THENCE N73°15'21"W A DISTANCE OF 150.03 FEET;

THENCE N84°47'36"W A DISTANCE OF 99.34 FEET;

THENCE N85°55'37"W A DISTANCE OF 123.91 FEET;

THENCE N77°06'17"W A DISTANCE OF 106.68 FEET;

THENCE N87°08'31"W A DISTANCE OF 84.15 FEET;

THENCE N84°35'38"W A DISTANCE OF 144.06 FEET;

THENCE N75°14'29"W A DISTANCE OF 128.08 FEET TO THE WEST LINE OF THE SOUTHWEST QUARTER OF SAID SECTION 1;

THENCE N02°44'00"W, ALONG SAID WEST LINE, A DISTANCE OF 921.98 FEET TO THE NORTHWEST CORNER OF SAID SOUTHWEST QUARTER;

THENCE S89°49'13"W, ALONG THE SOUTH LINE OF SAID NORTH HALF OF SECTION 2, A DISTANCE OF 5,283.44 FEET TO THE WEST QUARTER CORNER OF SAID SECTION 2;

THENCE N01°46'49"W, ALONG THE WEST LINE OF SAID NORTH HALF, A DISTANCE OF 2,068.20 FEET;

THENCE N54°27'35"E A DISTANCE OF 1,005.99 FEET TO THE NORTH LINE OF SAID NORTH HALF;

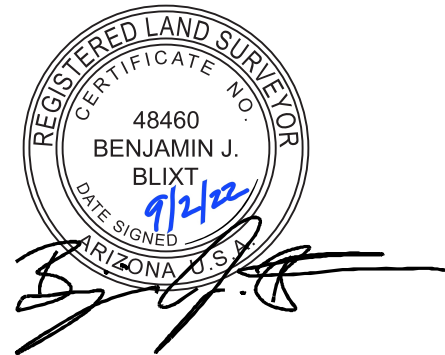
THENCE N89°54'46"E, ALONG SAID NORTH LINE, A DISTANCE OF 1,784.65 FEET TO THE NORTH QUARTER CORNER OF SAID SECTION 2;

THENCE N89°54'53"E, CONTINUING ALONG SAID NORTH LINE, A DISTANCE OF 2,621.27 FEET TO THE NORTHWEST CORNER OF THE NORTHWEST QUARTER OF SAID SECTION 1;

THENCE N89°55'57"E, ALONG THE NORTH LINE OF SAID NORTHWEST QUARTER, A DISTANCE OF 2,597.67 FEET TO THE NORTHWEST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1;

THENCE N89°12'08"E, ALONG THE NORTH LINE OF SAID NORTHEAST QUARTER, A DISTANCE OF 2,678.56 FEET TO THE **POINT OF BEGINNING**.

CONTAINING AN AREA OF 33,034,614 SQUARE FEET, OR 758.37 ACRES, MORE OR LESS



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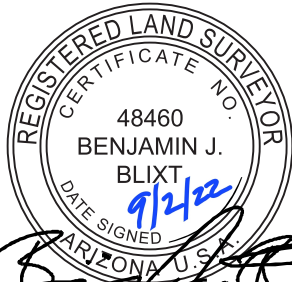
Cameron Solar

Pinar County, Arizona

MLDR to Green Energy Exhibit

DATE: 08/25/2022

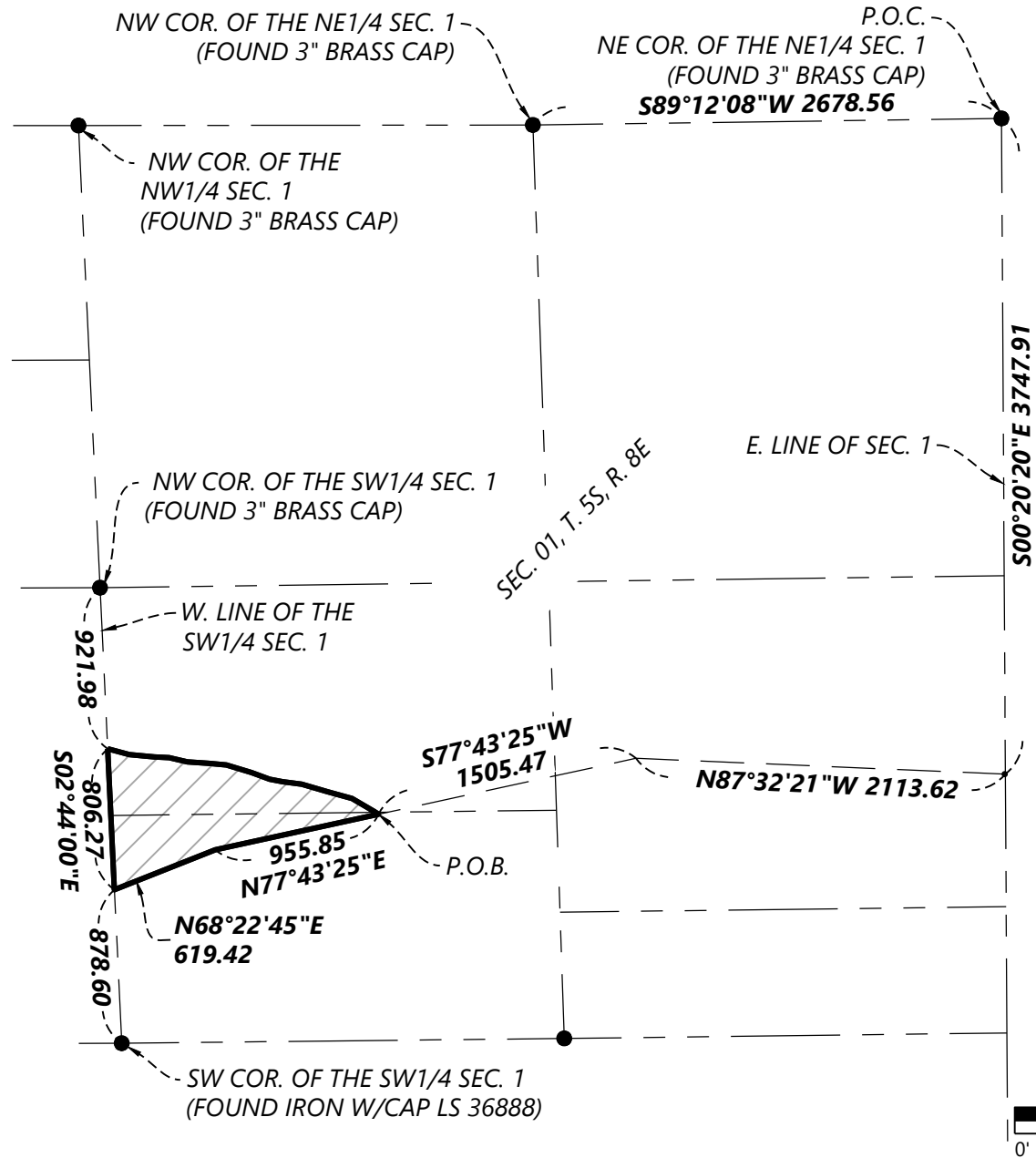
SHEET: 03 of 03



SEE SHEET 2 FOR PARCEL DETAIL

LEGEND

	SUBJECT AREA
P.O.B.	POINT OF BEGINNING
P.O.C.	POINT OF COMMENCEMENT
	BOUNDARY LINE
	FOUND MONUMENT (SEE LABEL)
	SECTION LINE



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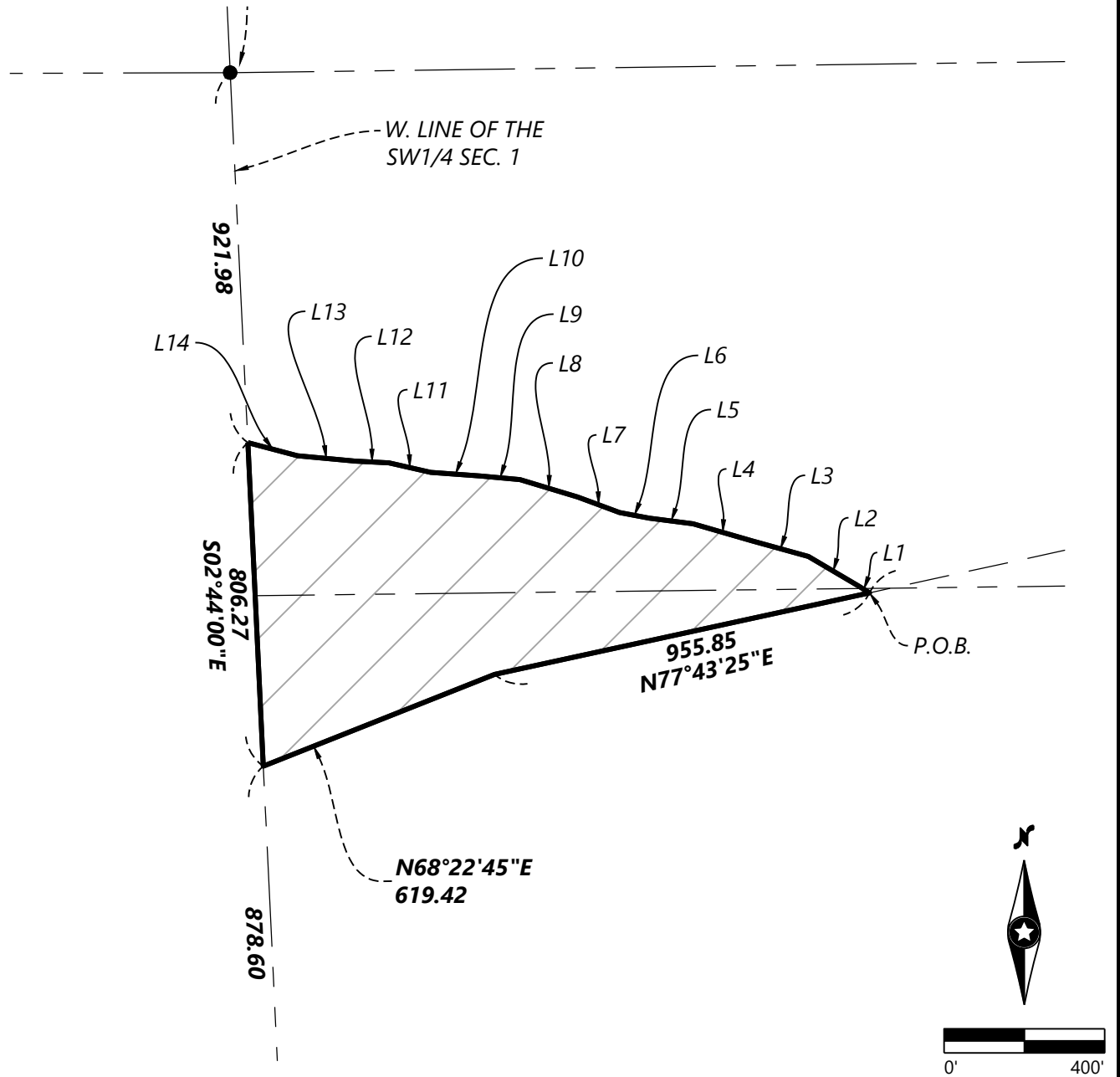
MLDR to Recreation/ Conservation Exhibit

DATE: 08/25/2022

SHEET: 01 of 03

LINE TABLE

LINE	BEARING	DISTANCE
L1	N58°13'42"W	33.06
L2	N59°32'09"W	144.06
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Cameron Solar

Pinal County, Arizona

MLDR to Recreation/ Conservation Exhibit

DATE: 08/25/2022

SHEET: 02 of 03

LEGAL DESCRIPTION

THAT PART OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST, OF THE GILA AND SALT RIVER MERIDIAN, PINAL COUNTY, ARIZONA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, FROM WHICH THE NORTHWEST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1, MONUMENTED BY A 3" BRASS CAP, BEARS S89°12'08"W A DISTANCE OF 2678.56 FEET AND IS THE **BASIS OF BEARINGS** FOR THIS DESCRIPTION;

THENCE S00°20'20"E, ALONG THE EAST LINE OF SAID SECTION 1, A DISTANCE OF 3,747.91 FEET;
THENCE N87°32'21"W A DISTANCE OF 2,113.62 FEET;
THENCE S77°43'25"W A DISTANCE OF 1,505.47 FEET TO **THE POINT OF BEGINNING**;
THENCE N58°13'42"W A DISTANCE OF 33.06 FEET;
THENCE N 59°32'09"W A DISTANCE OF 144.06 FEET;
THENCE N74°33'02"W A DISTANCE OF 143.89 FEET;
THENCE N73°48'08"W A DISTANCE OF 154.76 FEET;
THENCE N82°43'56"W A DISTANCE OF 109.73 FEET;
THENCE N79°11'45"W A DISTANCE OF 75.57 FEET;
THENCE N69°38'13"W A DISTANCE OF 111.06 FEET;
THENCE N73°15'21"W A DISTANCE OF 150.03 FEET;
THENCE N84°47'36"W A DISTANCE OF 99.34 FEET;
THENCE N85°55'37"W A DISTANCE OF 123.91 FEET;
THENCE N77°06'17"W A DISTANCE OF 106.68 FEET;
THENCE N87°08'31"W A DISTANCE OF 84.15 FEET;
THENCE N84°35'38"W A DISTANCE OF 144.06 FEET;
THENCE N75°14'29"W A DISTANCE OF 128.08 FEET TO THE WEST LINE OF THE SOUTHWEST QUARTER OF SAID SECTION 1;
THENCE S02°44'00"E, ALONG SAID WEST LINE, A DISTANCE OF 806.27 FEET;
THENCE N68°22'45"E A DISTANCE OF 619.42 FEET;
THENCE N77°43'25"E A DISTANCE OF 955.85 FEET TO THE **POINT OF BEGINNING**.

CONTAINING AN AREA OF 634,113 SQUARE FEET, OR 14.56 ACRES, MORE OR LESS.



Westwood

Phone (320) 253-9495 1900 Medical Arts Ave S, Suite 100
Fax (320) 358-2001 Sartell, MN 56377
Toll Free (800) 270-9495 westwoodps.com

Westwood Professional Services, Inc.

Cameron Solar

Pinar County, Arizona

MLDR to Recreation/ Conservation Exhibit

DATE: 08/25/2022

SHEET: 03 of 03

NOTICE OF PUBLIC HEARING BY THE PINAL COUNTY BOARD OF SUPERVISORS COMMISSION AT 9:30 A.M. ON THE **2ND** DAY OF **NOVEMBER, 2022**, IN THE PINAL COUNTY ADMINISTRATIVE COMPLEX, IN THE BOARD OF SUPERVISORS HEARING ROOM, 135 N. PINAL STREET, FLORENCE, ARIZONA, TO CONSIDER THE FOLLOWING REQUEST FOR A MAJOR AMENDMENT TO THE PINAL COUNTY COMPREHENSIVE PLAN:

PZ-PA-007-22 PUBLIC HEARING/ACTION: The Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC.(a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant, requesting approval of a Major Comprehensive Plan Amendment to the 2019 Pinal County Comprehensive Plan to re-designate 888.06 ± acres from MLDR (Moderate Low Density Residential) and Recreation/Conservation to Green Energy Production and Recreation/Conservation for a photovoltaic Solar Power Plant, situated in Section 1, Section 2, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

ALL PERSONS INTERESTED IN THIS MATTER MAY APPEAR AT THE PUBLIC HEARING AT THE DATE, TIME AND PLACE DESIGNATED ABOVE.

DOCUMENTS PERTAINING TO THIS CASE CAN BE FOUND ON THE NOTICE OF HEARING PAGE FOR THE P&Z COMMISSION AT:

<http://pinalcountyz.gov/CommunityDevelopment/Planning/Pages/NoticeofHearing.aspx#>

AT LEAST 24 HOURS PRIOR TO THE PUBLIC HEARING, DOCUMENTS PERTAINING TO THESE REQUESTS ARE AVAILABLE FOR PUBLIC INSPECTION AT THE PINAL COUNTY COMMUNITY DEVELOPMENT DEPARTMENT, PINAL COUNTY COMPLEX, 85 N. FLORENCE STREET, FLORENCE, ARIZONA, MONDAY THROUGH FRIDAY BETWEEN THE HOURS OF 8:00AM AND 4:30 PM.

DATED this **13th** day of July, **2022**, Pinal County Community Development Dept.

By:  _____

Brent Billingsley, Community Development Director

TO QUALIFY FOR FURTHER NOTIFICATION IN THIS LAND USE MATTER YOU MUST FILE WITH THE PLANNING DEPARTMENT A WRITTEN STATEMENT OF SUPPORT OR OPPOSITION TO THE SUBJECT APPLICATION. YOUR STATEMENT MUST CONTAIN THE FOLLOWING INFORMATION:

- 1) Planning Case Number (see above)
- 2) Your name, address, telephone number and tax parcel number (Print or type)
- 3) A brief statement of reasons for supporting or opposing the request
- 4) Whether or not you wish to appear and be heard at the hearing

WRITTEN STATEMENTS MUST BE FILED WITH:
PINAL COUNTY COMMUNITY DEVELOPMENT DEPARTMENT
PO BOX 2973 (85 N.FLORENCE STREET)
FLORENCE, AZ 85132

NO LATER THAN 5:00 PM ON OCTOBER 24, 2022.

Contact for this matter: Sangeeta Deokar, Planner
E-mail Address: sangeeta.deokar@pinalcountyz.gov
Phone #: (520) 866-6641 Fax: (520) 866-6530

Anything below this line is not for publication.]

PUBLISHED ONCE:

Florence Reminder & Blade Tribune (and San Tan Sentinel)
Tri-Valley Dispatch
Casa Grande Dispatch
Eloy Enterprise
Superior Sun
San Manuel Miner
Copper Basin

THE ARIZONA REPUBLIC

PO Box 194, Phoenix, Arizona 85001-0194

Phone 1-602-444-7315

Fax 1-877-943-0443

This is not an invoice

PNI-Arizona Republic

AFFIDAVIT OF PUBLICATION

**TETRA TECH INC.
730 N FORGEUS AVE
TUCSON, AZ 85716-4129**

This is not an invoice

Order # 0005441163 # of Affidavits 1

P.O # PZ-PA-007-22

Issues Dated:

10/12/22

**STATE OF WISCONSIN
COUNTY OF BROWN } SS.**

I, being first duly sworn, upon oath deposes and says: That I am the legal clerk of the Arizona Republic, a newspaper of general circulation in the counties of Maricopa, Coconino, Pima and Pinal, in the State of Arizona, published weekly at Phoenix, Arizona, and that the copy hereto attached is a true copy of the advertisement published in the said paper in the issue(s) dated indicated.



Sworn to before me this

12 TH day of
OCTOBER 2022



Notary Public

My Commission expires:

9/19/25

NOTICE OF PUBLIC HEARING BY THE PINAL COUNTY BOARD OF SUPERVISORS COMMISSION AT 9:30 A.M. ON THE 2ND DAY OF NOVEMBER, 2022, IN THE PINAL COUNTY ADMINISTRATIVE COMPLEX, IN THE BOARD OF SUPERVISORS HEARING ROOM, 135 N. PINAL STREET, FLORENCE, ARIZONA, TO CONSIDER THE FOLLOWING REQUEST FOR A MAJOR AMENDMENT TO THE PINAL COUNTY COMPREHENSIVE PLAN:

PZ-PA-007-22 PUBLIC HEARING / ACTION: The Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC (a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant, requesting approval of a Major Comprehensive Plan Amendment to the 2019 Pinal County Comprehensive Plan to re-designate 888.06 ± acres from ALDR (Moderate Low Density Residential) and Recreation / Conservation to Green Energy Production and Recreation/Conservation for a photovoltaic Solar Power Plant, situated in Section 1, Section 2, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

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Brent Billingsley, Community Development Director

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FLORENCE, AZ 85132
NO LATER THAN 5:00 PM ON OCTOBER 24, 2022.
Contact for this matter: Sangeeta Deokar, Planner
E-mail Address: sangeeta.deokar@pinalcountyaz.gov
Phone #: (520) 866-6641
Fax: (520) 866-6530
Pub: Oct 12, 2022

VICKY FELTY
Notary Public
State of Wisconsin

PZ-PA-007-22



MEETING DATE: September 15, 2022

TO: PLANNING AND ZONING COMMISSION

CASE NO.: **PZ-PA-007-22 (Cameron Solar)**

CASE COORDINATOR: Sangeeta Deokar

Executive Summary:

This is a major amendment to the Pinal County Comprehensive Plan to re-designate approximately 888.06± acres of land from Moderate Low Density Residential (1-3.5 du/ac) and Recreation/Conservation to Green Energy Production and Recreation/Conservation to allow a photovoltaic solar power plant north of the City of Coolidge adjacent to the Town of Florence.

If This Request is Approved:

If this major amendment to the Pinal County Comprehensive Plan is approved, the action will allow the applicant to begin the process of rezoning the property to develop a photovoltaic solar energy production facility on 888.06± acres. The approval of this amendment also considers the existing Recreation-Conservation zone south of the project area that aligns with the Gila River open space corridor with its floodplain in Pinal County.

Staff Recommendation/Issues for Consideration/Concern:

Staff recommends approval for the applicant's request.

LEGAL DESCRIPTION: Sections 1, and 2, T05S, R08E, G&SRB&M

TAX PARCEL: 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005

LANDOWNER/AGENT: Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC. (a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant.

REQUESTED ACTION & PURPOSE: **PZ-PA-007-22 – PUBLIC HEARING/ACTION:** Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC.(a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant, requesting approval of a **Major Comprehensive Plan Amendment to the 2019 Pinal County Comprehensive Plan** to re-designate 888.06 ± acres from MLDR (Moderate Low Density Residential) and Recreation/Conservation to Green Energy Production and Recreation/Conservation for a photovoltaic Solar Power Plant, situated in Section 1, Section 2, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, 209-02-001, 209-02-002, 209-02-003, 209-02-004 and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

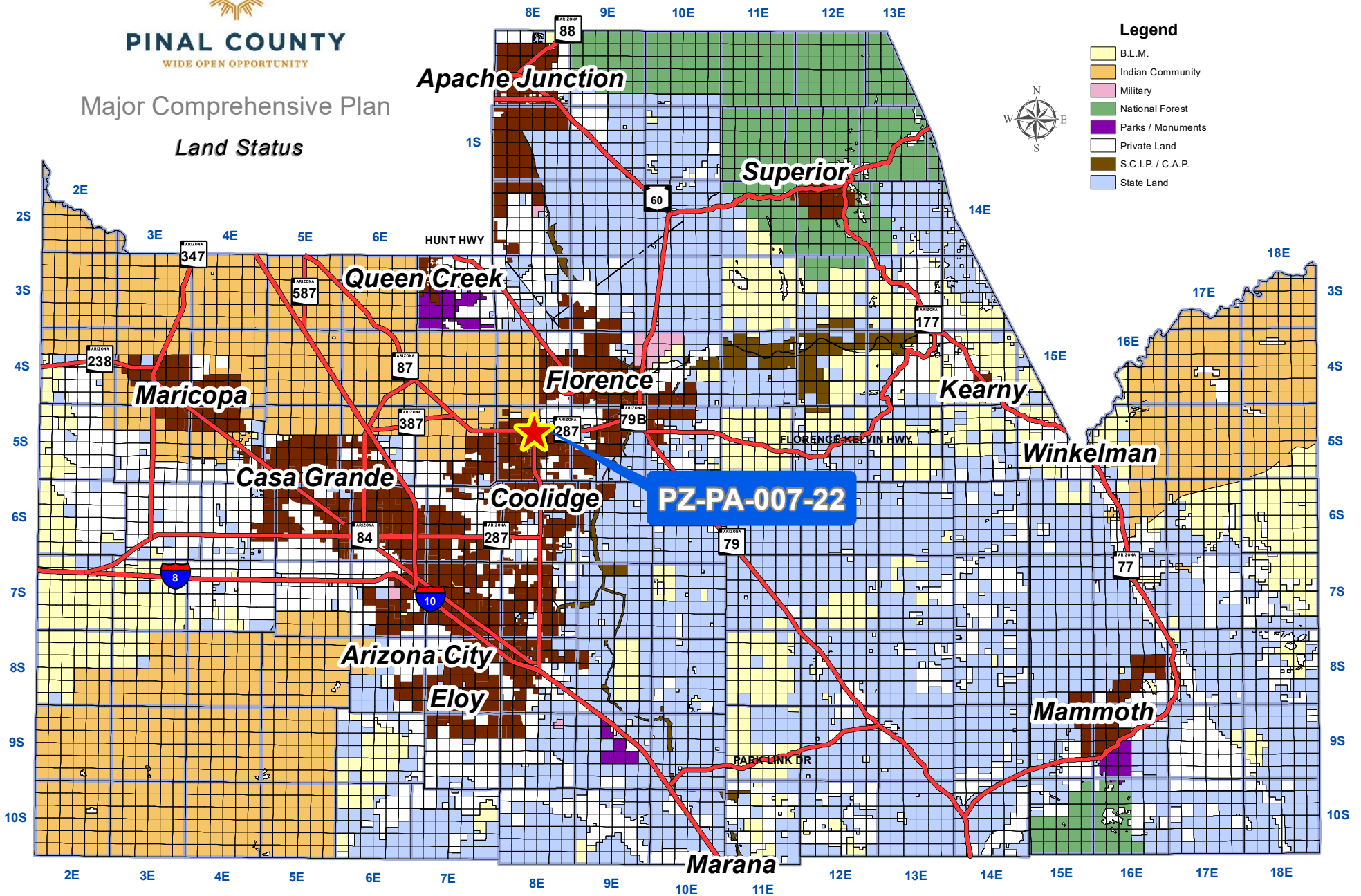


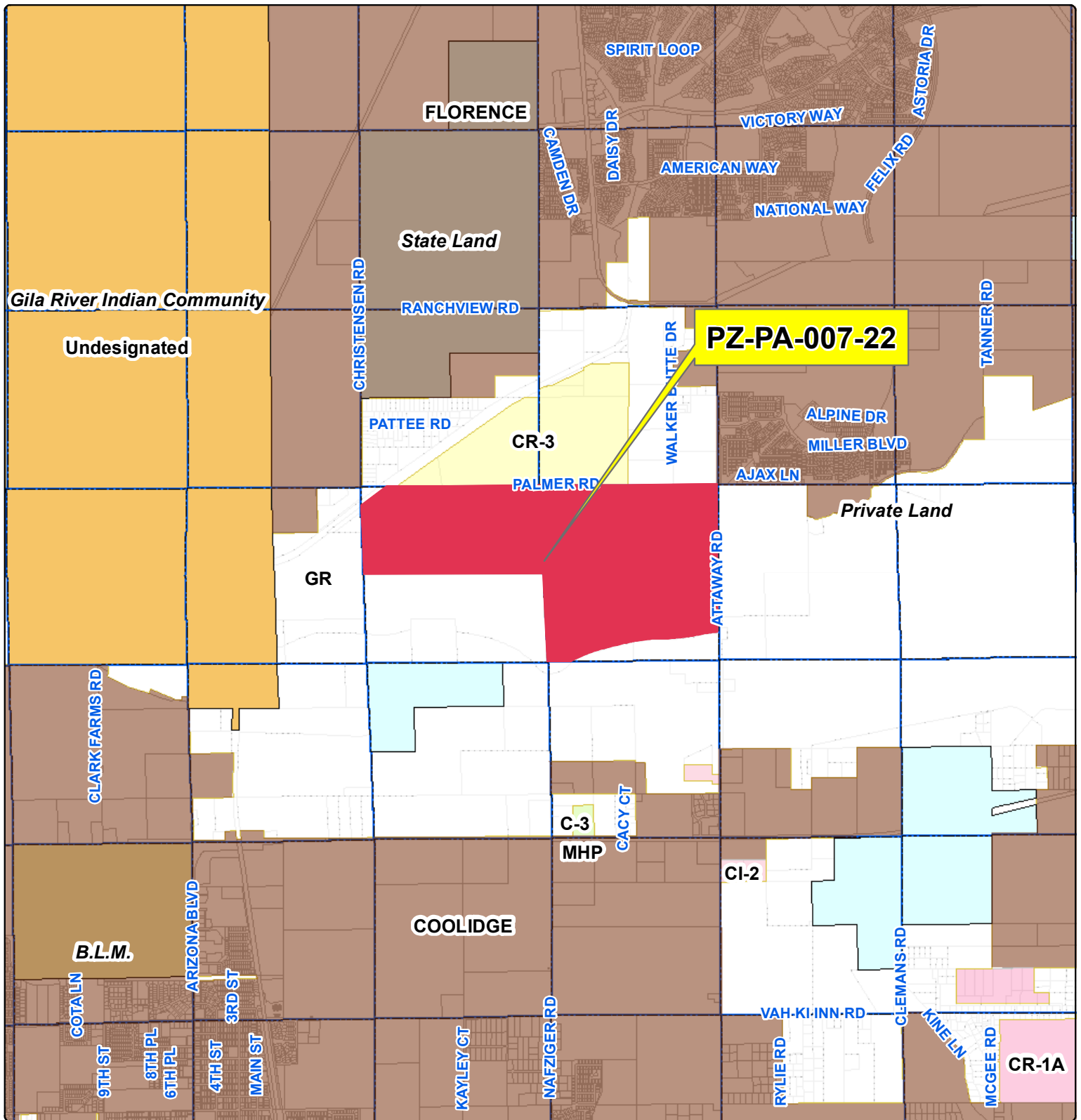
PINAL COUNTY

WIDE OPEN OPPORTUNITY

Major Comprehensive Plan

Land Status





Rezone/Community Development



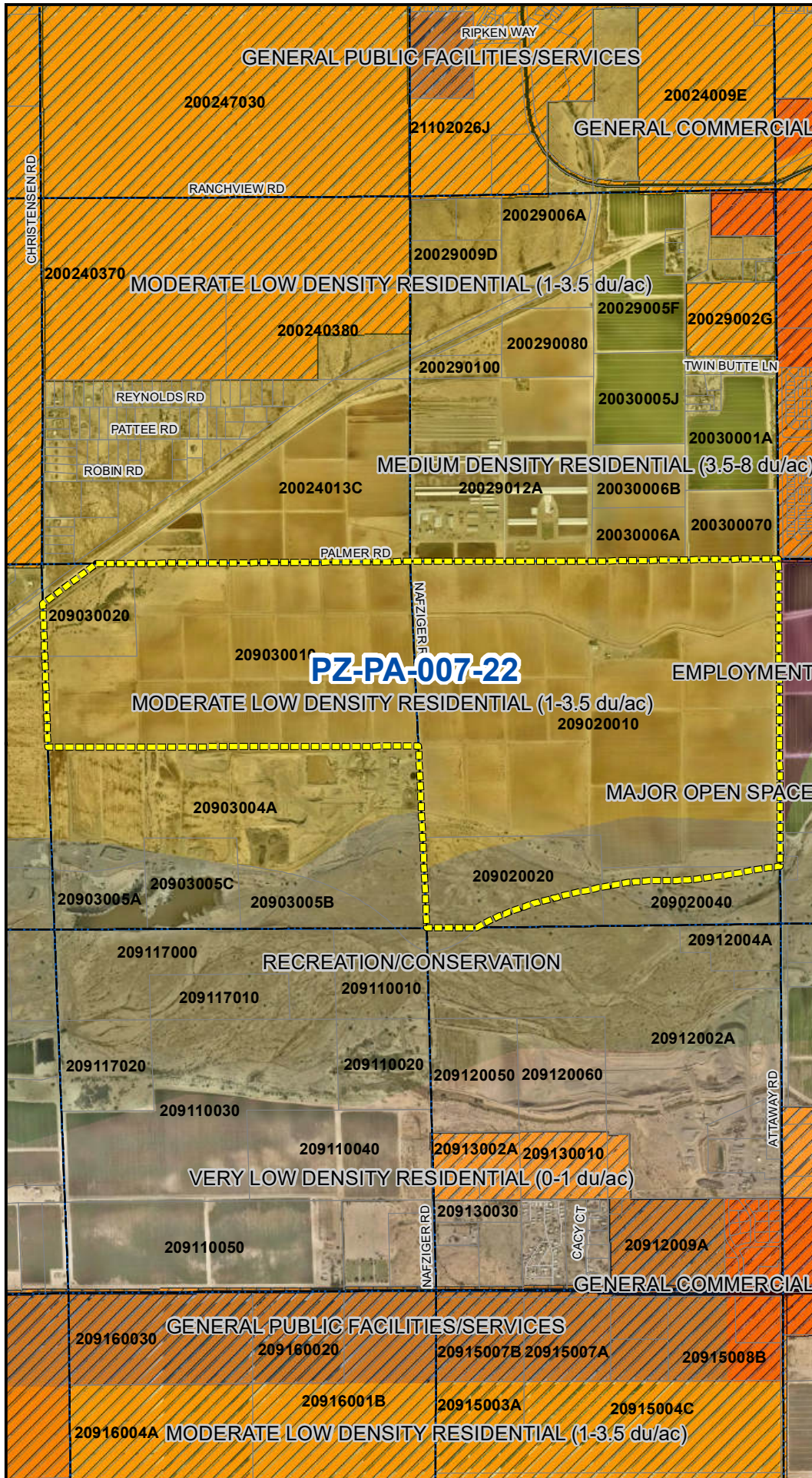
PINAL COUNTY
WIDE OPEN OPPORTUNITY

Legal Description:

Situated in Section 20, Section 10, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, and portions of parcels 209-02-001, 209-02-002, and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.



Owner/Applicant: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS AURORA SOLAR LLC (A SUBSIDIARY OF AURORA RENEABLES LLC), KRISTEN GOLLAND			
Drawn By:	GIS / IT / LJT	Date:	07/19/2022
Sheet No.	Sections 10, 20	Township 05S	Range 08E
Case Number:	PZ-PA-007-22		



PZ-PA-007-22

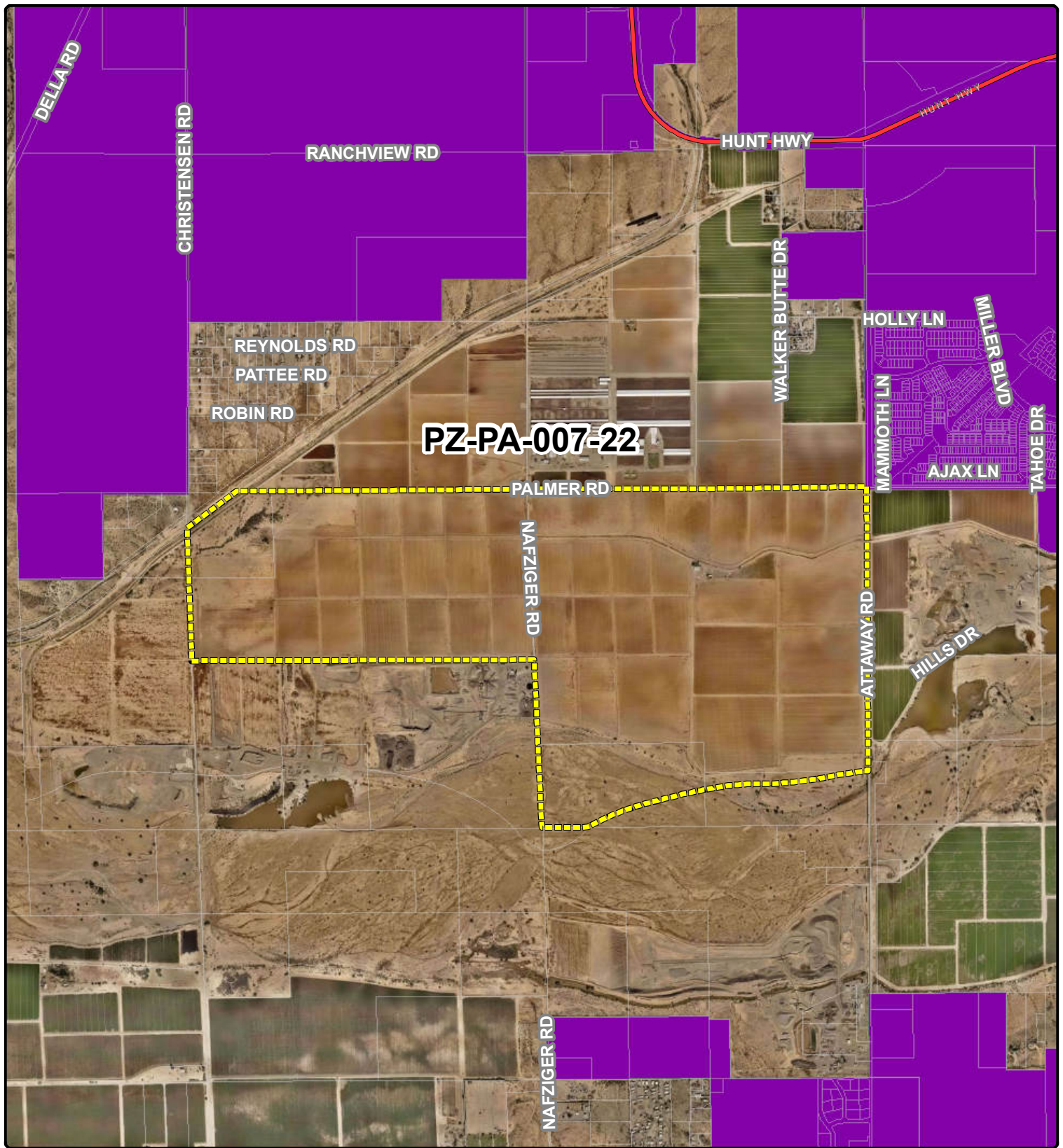
FROM:

MODERATE
LOW DENSITY
RESIDENTIAL,
RECREATION/
CONSERVATION

TO:

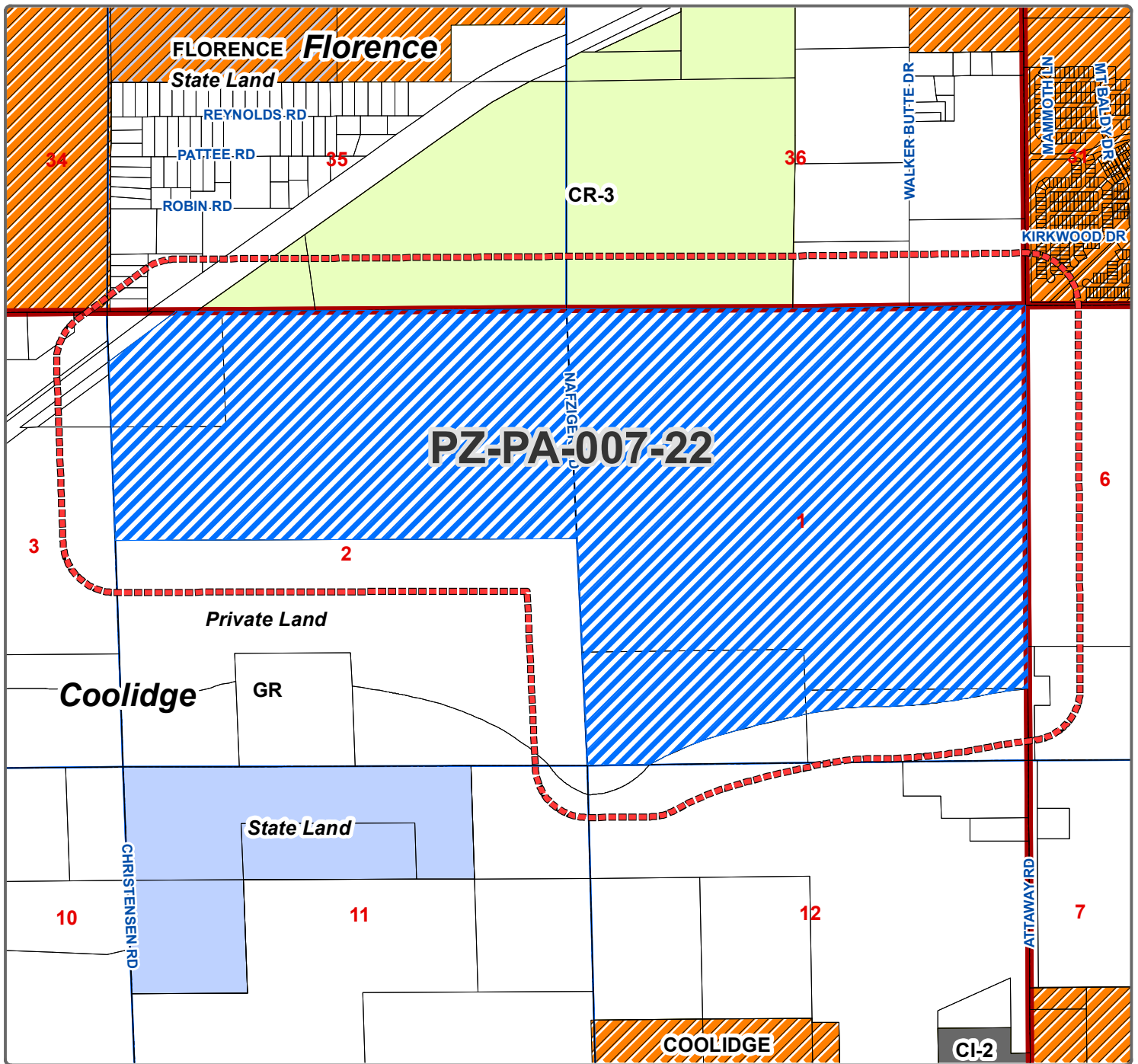
GREEN ENERGY
PRODUCTION,
RECREATION/
CONSERVATION





Rezone/Community Development





Rezone

PZ-PA-007-22 PUBLIC HEARING/ACTION: The Church of Jesus Christ of Latter-day Saints, landowner, Aurora Solar LLC (a subsidiary of Avangrid Renewables LLC), Kristen Goland, applicant, requesting approval of a Major Comprehensive Plan Amendment to the 2019 Pinal County Comprehensive Plan to re-designate 888.06 ± acres from MLDR (Moderate Low Density Residential) and Recreation/Conservation to Green Energy Production and Recreation/Conservation for a photovoltaic Solar Power Plant, situated in Section 20, Section 10, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, and portions of parcels 209-02-001, 209-02-002, and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

Current Zoning: GR

Requested Zoning: Rezone

Current Land Use: MLDR, RECREATION/CONSERVATION



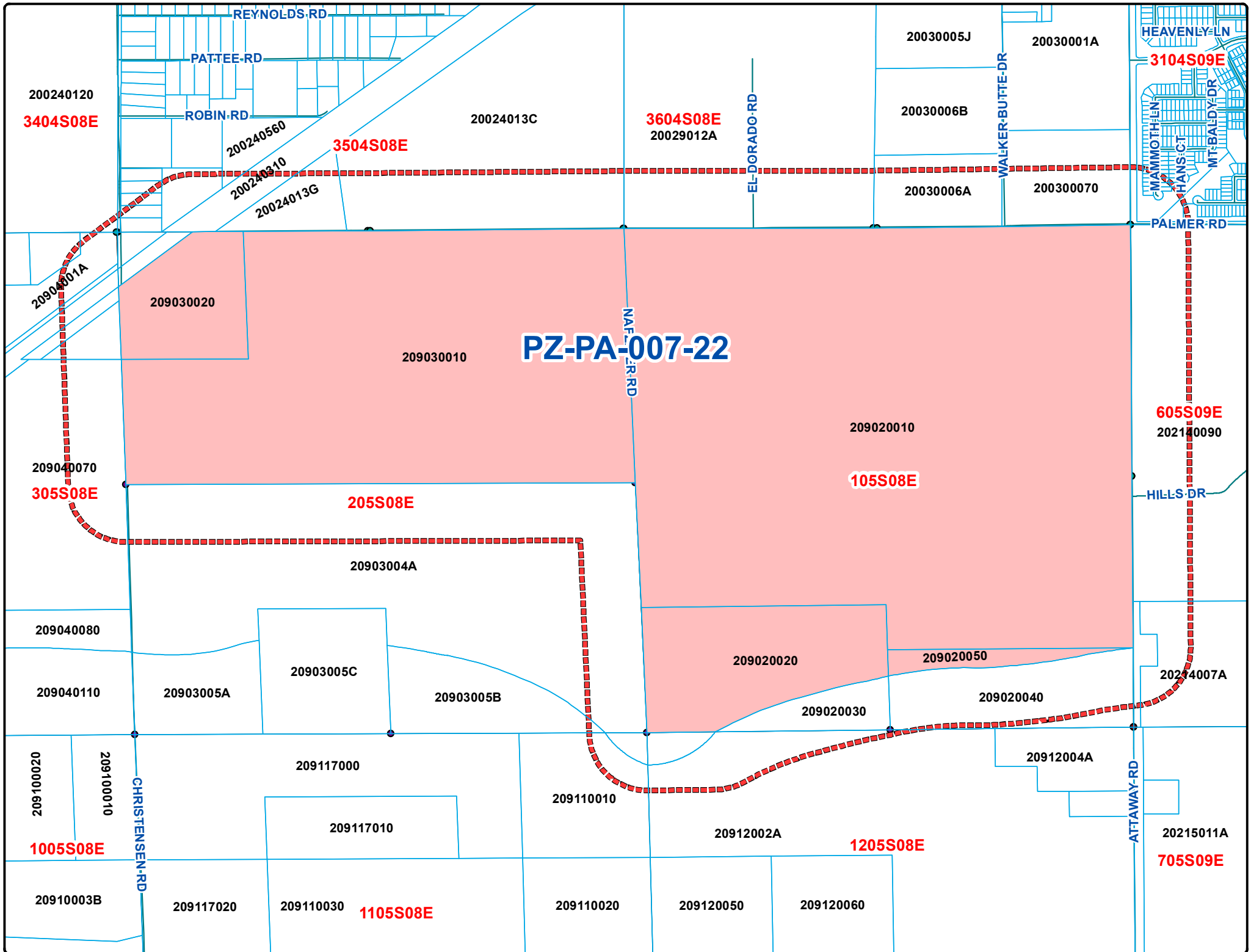
Legal Description:

Situated in Section 20, Section 10, T5S, R08E G&SRB&M, tax parcels 209-03-001, 209-03-002, and portions of parcels 209-02-001, 209-02-002, and 209-02-005, (legal on file), located half a mile north of the City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.



Owner/Applicant: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS AURORA SOLAR LLC (A SUBSIDIARY OF AVANGRID RENEWABLES LLC), KRISTEN GOLAND		
Drawn By: GIS / IT /LJT	Date: 07/19/2022	
Sections 10, 20	Township 05S	Range 08E
Case Number: PZ-PA-007-22		

Sheet No.
1 of 1



LOCATION: Located north of City of Coolidge adjacent to the Town of Florence in the unincorporated Pinal County.

SIZE: 888.06± acre project area.

STAFF FINDINGS-

PUBLIC COMMENT:

To date two comments have been received in opposition.

PUBLIC PARTICIPATION:

P&Z Work Session:	7/21/2022
BOS Work Session:	8/10/2022
Web posting and 60 day review:	6/10/2022 to 8/12/2022
Citizen Advisory Committee:	9/01/2022

OTHER REVIEW AGENCY COMMENTS:

As of the writing of this report no agency comment has been received.

PLAN AMENDMENT DISCUSSION:

Request:

The applicant is requesting a major amendment of the Pinal County Comprehensive Plan to amend the Land Use Plan from **Moderate Low Density Residential (1-3.5 du/ac)** and **Recreation/Conservation** to **Green Energy Production** and **Recreation/Conservation** on approximately 888.06± acres. The property is currently zoned General Rural (GR) and has been used as active agricultural land with portions that are fallow and also disturbed vacant lands. The project property has an existing commercial agricultural building.

Project Proposal:

The applicant is proposing to construct and operate a photovoltaic (PV) solar generation facility with an energy output of approximately 100 megawatts of solar generation with battery storage facility. The project includes all infrastructure required by a Solar project that includes substations, O&M building, Solar arrays and electrical distribution lines. The proposal intends to interconnect to the APS or the SRP existing transmission lines close to the project area. The project abuts the Gila River along the south edge with the 100 year floodplain. This is proposed to remain as Recreation/Conservation zone with no development. The infrastructure would be laid out with the 100 foot setback after the floodplain zone.

Site data:

The project area consists of active agricultural, fallow and partially disturbed lands. The project area to the south is bordered by the Gila River along with the 100 year flood plain. This portion of the project is the Recreation/Conservation zone. The area is largely unpopulated and surrounded by heavy industries.

Land Use Designation:

The designations within the Comprehensive Plan for all properties to the site is Moderate Low Density Residential (1-3.5 du/ac) and Recreation/Conservation. This area is surrounded by industrial uses. To the north is the Cross Creek Dairy, and to the south- east is the CEMEX Coolidge Concrete Plant. Southwest Rock Coolidge to the east and Cal Portland to the west. Although the area is zoned residential, this is not a suitable location for any residential development.

Location and Accessibility:

The Project is accessible via multiple routes, including North Attaway Road, East Palmer road, Quail Run Lane, and North Christensen Road. The Union Pacific Railroad, a major freight corridor is located 0.8 mile west of the Project. The Gila River borders the south of the project.

Environmental Studies:

The site is generally levelled with a lack of sensitive biological resources. A canal runs east-west through the northeastern portion of the project owned by the San Carlos Irrigation District. No designated or proposed critical habitat for the federally protected species is known to occur in or within 5 miles of the Project.

The applicant has provided a detailed analysis of existing environmental constraints, which preliminarily show that the site is abutting a riparian area in the southern vicinity of the project. Arizona Game and Fish Department online tool was used and the report showed special status for three fresh water fish species and two terrestrial species identified that are recommended for conservation. No designated critical habitats are within or near the project area. The proposed project also does not anticipate any impacts to endangered species.

Further analysis, study and research will be completed in consultation with US Fish & Wild Life Services and Arizona Game & Fish Department with relevant state and federal laws when the project moves forward in the rezoning process. Mitigation strategies would be required as directed by the Arizona Game and Fish Department if the land-use change is approved.

STAFF ANALYSIS AND RECOMMENDATION:

After a detailed review of the request, Pinal County Comprehensive Plan and Pinal County Development Services Code, staff recommends **approval** for the land use change. Following are the reason for supporting the land-use amendment:

1. Remote location, sparsely populated with homes
2. Project Area is surrounded by industrial land uses and the Green Energy Production land use designation seems compatible with surrounding land uses.

However, in addition to staff comments, should the Citizen Advisory Committee find, after the presentation of the applicant and together with the testimony and evidence presented at the public hearing, that this Major Comprehensive Plan amendment is needed and necessary at this location and time, will not negatively impact adjacent properties, will promote orderly growth and development of the County and will be compatible and consistent with the applicable goals and policies of the Pinal County Comprehensive Plan, then staff recommends that the Citizen Advisory Committee forward **PZ-PA-007-22**, to the Planning and Zoning Commission with a favorable recommendation. If the Citizen Advisory Committee cannot find for all of the factors listed above, then staff recommends that the Citizen Advisory Committee forward this case to the Planning and Zoning Commission with recommendation of denial.

CITIZENS ADVISORY COMMITTEE ACTION:

After a detailed discussion and decision, at the public hearing, the Citizen’s Advisory Committee voted 8-2 to recommend approval of case PZ-PA-007-22 with the following recommendations:

1. To conserve the open space and connectivity corridors as recommended by the County Staff.
2. New infrastructure needed for the project should be placed such as to avoid crossing any residential areas.
3. Additional surveys would need to be conducted for species found that need to be conserved as per the ERT report.



APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT IN AN UNINCORPORATED AREA OF PINAL COUNTY, ARIZONA
(All Applications Must Be Typed or Written in Ink)

Comprehensive Plan Amendment unincorporated & Property Information:

(Feel free to include answers and to these questions in a Supplementary Narrative, when doing so write see narrative on the space provided)

1. The legal description of the property: See Exhibit A of the Agency Authorization
2. Parcel Number(s): _____ Total Acreage: _____
3. Current Land Use Designation: _____
4. Requested Land Use Designation: _____
5. Date of Concept Review: _____ Concept Review Number: _____
6. Why is this Comprehensive Plan Amendment being requested? (You must provide a summary of the anticipated development on this page, if not provided, the application cannot be processed.): _____

7. Discuss any recent changes in the area that would support your application. _____

8. Explain why the proposed amendment is needed and necessary at this time. _____

INV#: _____ AMT: _____ DATE: _____ CASE: _____ Xref: _____

COMMUNITY DEVELOPMENT
Planning Division

6.0 WHY IS THIS COMPREHENSIVE PLAN AMENDMENT BEING REQUESTED? (YOU MUST PROVIDE A SUMMARY OF THE ANTICIPATED DEVELOPMENT ON THIS PAGE, IF NOT PROVIDED, THE APPLICATION CANNOT BE PROCESSED.)

Aurora Solar LLC, a wholly-owned subsidiary of Avangrid Renewables LLC (the Applicant), is requesting this amendment to construct, operate, maintain, and decommission the proposed Cameron Solar Project (Project), a photovoltaic (PV) solar facility comprising of five parcels. The proposed Project is an electrical generation facility with an output of up to approximately 100 megawatts (MW). The Project will require additional Project ancillary facilities. The proposed interconnection of the Project is currently being reviewed, but may include tying directly into the Arizona Public Service (APS) or the Salt River Project (SRP) existing transmission lines that are in close proximity to the Project.

7.0 DISCUSS ANY RECENT CHANGES IN THE AREA THAT WOULD SUPPORT YOUR APPLICATION

The existing APS and SRP transmission lines, and the Valley Farms Substation, are all in close proximity to the Project. The Project vicinity is surrounded by existing industrial uses (including the Solterra Materials Coolidge, Hanson Florence Plant, Southwest Rock Coolidge, a CalPortland Plant, and a CEMEX Coolidge Concrete Plant), agricultural uses, and vacant land.

In January 2020, APS made the commitment to provide 65 percent clean energy by 2030 and 100 percent carbon-free energy by 2050. The Applicant's Project would help APS meet this recent commitment by providing clean, safe, affordable, and efficient energy to the regional transmission grid and to APS. This amendment is also needed because the Applicant has entered into an interconnection agreement with APS for the Project, which legally necessitates that the Project be commercially operated by a certain time.

The land use designation changes proposed under the requested Major Comprehensive Plan Amendment (MCPA) are consistent with the existing and planned industrial/utility land uses on and adjacent to the Project parcels. Additionally, the existing utility infrastructure near the Project makes the Project site compatible for this type of land use.










8.0 EXPLAIN WHY THE PROPOSED AMENDMENT IS NEEDED AND NECESSARY AT THIS TIME

The Applicant has identified the Project as an optimal location for an electrical generation facility based on the existence of compatible adjacent and nearby land uses, and the proximity to existing electrical infrastructure, major transportation corridors (highway and rail), electric utility corridors, and electrical load centers. Additionally, the Project is a large, contiguous area of flat or early flat land that is needed for solar facilities. Finally, the Project site appears to be absent of sensitive resources (such as high-quality habitat for sensitive or protected species or other wildlife) based on desktop review and is currently used as agricultural lands, which tend to not have sensitive resources onsite.

The amendment is needed in order to facilitate development of the proposed electrical generation facility, in turn allowing the contribution of clean, safe, affordable, and efficient energy to the regional transmission grid. As mentioned previously, APS recently committed to provide 65 percent clean energy by 2030 and 100 percent carbon-free energy by 2050. The Applicant's Project would help APS meet this recent commitment by providing clean, safe, affordable, and efficient energy to the regional transmission grid and to APS. The Project will be built in a single phase that would take approximately 12 to 18 months to construct, with a planned commercial operation date of December 31, 2025. The Project would be operational for 40 years. To meet the commercial operation date of December 31, 2025, the Applicant must submit the formal MCPA application for the 2022 calendar year for consideration by Pinal County.

PINAL COUNTY COMPREHENSIVE PLAN AMENDMENT APPLICATION

IN ADDITION TO THIS APPLICATION, YOU WILL NEED TO SUBMIT:

-  A. **Certified Boundary Survey**, including legal descriptions of the proposed designations
-  B. Location map which identifies the property and its relationship to Pinal County environs.
-  C. Map showing the topography of the property.
-  D. Site map which specifically identifies the property including parcels under separate ownership.
-  E. Property owner(s) authorization for the Comprehensive Plan Amendment.
-  F. Other information as may be determined necessary by the Planning staff or other information the applicant feels is pertinent to this request.
-  G. Non-refundable filing fee as shown on the cover page.
-  H. Narrative in PDF format.
-  I. Neighborhood meeting report

Your application must be submitted digitally via the online submittal portal site at

<https://citizenaccess.pinalcountyz.gov/CitizenAccess/Default.aspx>

Please call or email the Planning Division for more information.

I certify the information included in this application is accurate, to the best of my knowledge. I have read the application and I have included the information, as requested. I understand if the information submitted is incomplete, this application cannot be processed.

The Church of Jesus Christ of Latter-day Saints 79 South Main Street, Suite 1000, Salt Lake City UT 84111 **801-715-9100**

Name of Landowner (Applicant)	Address	Phone Number
-------------------------------	---------	--------------

By:  *Rex Burgener*, *Authorized Agent*

Signature of Landowner (Applicant)	Land@FarmlandReserve.org
	E-Mail Address

Name of Agent	Address	Phone Number
---------------	---------	--------------

Signature of Agent	E-Mail Address
--------------------	----------------

The Agent has the authority to act on behalf of the landowner. The Agent will be the contact person for Planning staff and must be present at all hearings. Please use the attached Agency Authorization form, if applicable

PINAL COUNTY COMPREHENSIVE PLAN AMENDMENT APPLICATION

IN ADDITION TO THIS APPLICATION, YOU WILL NEED TO SUBMIT

- ☐ A. **Certified Boundary Survey**, including legal descriptions of the proposed designations
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I certify the information included in this application is accurate, to the best of my knowledge I have read the application and I have included the information, as requested I understand if the information submitted is incomplete, this application cannot be processed

Name of Landowner (Applicant)	Address	Phone Number
-------------------------------	---------	--------------

Signature of Landowner (Applicant)	E-Mail Address
------------------------------------	----------------

Kristen Goland	2701 NW Vaughn St, Suite 300, Portland, OR	508-397-6130
Name of Agent	Address	Phone Number

	Kristen.Goland@avangrid.com
Signature of Agent	E-Mail Address

The Agent has the authority to act on behalf of the landowner The Agent will be the contact person for Planning staff and must be present at all hearings Please use the attached Agency Authorization form, if applicable

AGENCY AUTHORIZATION

(To be completed by landowners of subject property when landowners do not represent themselves. Instructions for completing required information are in bold and brackets below lines. If applicant is a company, corporation, partnership, joint venture, trustee, etc., please use the corporate signature block and have the notary fill in the notarization section for corporations not individuals and cannot be submitted digitally)

TO. Pinal County Planning & Development Services
P.O. Box 2973
Florence, AZ 85132

The Church of Jesus Christ of Latter-day Saints

[Insert Name -- If a Corporation, Partnership or Association, Include State of Incorporation]

hereinafter referred to as "Owner," is/are the owner(s) of 935.59 acres located at
8009 E PALMER RD FLORENCE, AZ 85132, and further identified

[Insert Address of Property]

as assessor parcel number 209-02-001-02 / 209-02-002-01 / 209-02-003-00 / 209-02-004-09 / 209-02-005-08 / 209-03-001-00 / 209-03-002-09 and legally described as follows:

[Insert Parcel Number]

[Legal Description is attached hereto as Exhibit A]

Said property is hereinafter referred to as the "Property."

Owner hereby appoints Aurora Solar LLC

[Insert Agent's Name. If the Agent Is a Company, Insert Company Name Only]

hereinafter referred to as "Agent," to act on Owner's behalf in relation to the Property in obtaining approvals from Pinal County for any necessary amendment to Pinal County's Comprehensive Plan; zone changes; planned area development overlay districts; platting of the subject property, special use permit or industrial use permit; and to file applications and make the necessary submittals for such approvals.

Owner consents and agrees to be bound by all stipulations agreed to by this Agent in connection with any of above-referenced processes.

[Individual PROPERTY OWNER signature block and acknowledgment. DO NOT SIGN HERE IF SIGNING AS AN OFFICER OF A CORPORATION ON THE NEXT PAGE.]

[Signature] _____

[Signature] _____

[Address] _____

[Address] _____

Dated: _____

Dated. _____

STATE OF _____)
) ss
COUNTY OF _____)

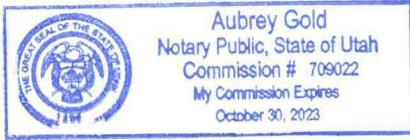
The foregoing instrument was acknowledged before me this ____ day of _____ by _____
[Insert Name of Signor(s)]

My commission expires _____

Printed Name of Notary

Signature of Notary Public

Corporate PROPERTY OWNER signature block and acknowledgment the appropriate corporate officer or trustee signs this signature block NOT the block on the previous page.



The Church of Jesus Christ of Latter-day Saints
[Insert Company or Trustee's Name]

By: Rex Burgener
[Signature of Authorized Officer or Trustee]

Its: Authorized Agent
[Insert Title]

Dated: 4/22/22

STATE OF Utah)
COUNTY OF Salt Lake) ss.

The foregoing instrument was acknowledged before me, this 22 day of April, 2022 by Rex Burgener, Authorized Agent of The Church of Jesus Christ of Latter-day Saints, an Utah corporation.
[Insert Signor's Name] [Insert Title] [Insert Name of Company or Trust] [Insert State of Incorporation, if applicable]

and who being authorized to do so, executed the foregoing instrument on behalf of said entity for the purposes stated therein.

Aubrey Gold
Notary Public

My commission expires: 10/30/2023

ALTERNATE: Use the following acknowledgment only when a second company is signing on behalf of the owner:

STATE OF _____)
COUNTY OF _____) ss.

On this _____ day of _____, _____, before me, the undersigned, personally appeared

[Insert Signor's Name] Who acknowledged himself/herself to be

[Title of Office Held] of _____ [Second Company]

As _____ for _____, and who being
[i.e, member, manager, etc.] [Owner's Name]

Authorized to do so, executed the foregoing instrument on behalf of said entities for the purposes stated therein.

My commission expires: _____

Printed Name of Notary

Signature of Notary

EXHIBIT A

All of the following described real property located in Pinal County, State of Arizona that are depicted below

Assessor Parcel No.	Acres	Property Description
209-02-001-02	504.06	ALL OF SEC 1-5S-8E EXC S1/2 SW & S-722' OF SE (X) 504.06 AC
209-02-002-01	62.19	S1/2 SW OF SEC 1-5S-8E LYING N OF N BANK OF GILA RIVER BANK (3) 62.19 AC
209-02-003-00**	13.43	S1/2 SW OF SEC 1-5S-8E LYING S OF N BANK OF GILA RIVER 13.43 AC
209-02-004-09**	34.1	S-722' OF SE OF SEC 1-5S-8E LYING S OF N BANK OF GILA RIVER (4) 34.10 AC
209-02-005-08	7.84	S-722' OF SE OF SEC 1-5S-8E LYING N OF N BANK OF GILA RIVER (4) 7.84 AC
209-03-001-00	278.93	N1/2 OF SEC 2-5S-8E LESS LOT 4 278.93 AC (7)
209-03-002-09	35.04	LOT 4 OF SEC 2-5S-8E LYING S OF RR (2) 35.04 AC
Total	935.59	

****Note:** Even though parcel 209-02-003-00 and parcel 209-02-004-09 are included in this legal description, the Applicant is not requesting these parcels land use designations be changed. Therefore, they are not included elsewhere in this Application for a Major Comprehensive Plan Amendment.

Appendix A: Comprehensive Plan Compliance Checklist

Purpose:

Provide guidance to ensure conformity of development proposals with the Pinal County Comprehensive Plan.

Intent:

1. Explain how to determine if development proposals are compatible with the Comprehensive Plan.
2. Explain why unique conditions exist to deviate from the Plan.

The Pinal County Comprehensive Plan graphics, Land Use, Circulation (two graphics), and Economic Development, are not intended to be zoning maps that outlines specific locations and parcel-by-parcel determination for land uses and facilities. The Comprehensive Plan's intent is to provide policy direction and a framework for how the Pinal County "development form" or layout should occur over time. It is not the intent to predetermine specifically where land uses must occur. Guidelines within the Land Use element provide direction on development and how it relates to transportation corridors, surrounding land uses, public facilities, and natural environment.

Determination:

Comprehensive Plan Compliance is determined by the development's conformity with the Comprehensive Plan's land use designations (Land Use graphic and Land Use element text) and activity centers (Land Use and Economic Development graphics and Economic Development element text) as well as the goals, objectives, policies and guidelines outlined in the Pinal County Comprehensive Plan. Planning guidelines for each of the land use designations and Activity Centers are also included in the Land Use element. It is important to note that all components and concepts may not apply to every potential proposal.

Organization:

The Compliance Checklist focuses on two major components:

1. Consistency with Pinal County's Vision Components
2. Consistency with the Plan's Key Concepts illustrated on Land Use, Circulation, and Economic Development graphics.

How Is the Checklist Used?

Various concepts are discussed and a "YES" checkbox is provided to indicate if the proposal complies with the key concepts of the Plan.

- If a project complies, it receives a ✓ in the appropriate box.
- If it does not comply, the checkbox will remain blank, and additional information would need to be provided to explain the unique circumstance, if applicable.

- If a project has no relation to a particular check list item, a “non applicable” response is acceptable with a brief explanation.

Who Should Use the Checklist?

Developers, staff, and decision-makers should use the Comprehensive Plan Compliance Checklist.

- ✓ Developers should use this checklist as a guide to the Plan’s policies in the early stages of a development proposal and when submitting an application for review.
- ✓ Staff should use it to review development proposals and to make recommendations to decision-makers. The checklist can assist in developing the staff report.
- ✓ Decision-makers can use the checklist to better understand how well a proposal does or does not comply with the Pinal County Comprehensive Plan.

PART ONE

Consistency with Pinal County's Vision Components

The Pinal County Comprehensive Plan is a vision-based plan that provides the framework that all decisions related to growth and development are measured against. The following is intended to describe how the proposal meets the various vision components.

Pinal County Vision The County recognizes the importance of the region's strategic location between the Phoenix and Tucson Metropolitan Areas and its relationship to the overall well-being of the state of Arizona. What happens in Pinal County does not stay in Pinal County; the decisions made here will impact the entire state on many levels: business development, mobility, land management, air quality, water, and overall quality of life. People choose Pinal County for the diverse opportunities it offers; this diversity is what makes Pinal County unique but also represents a challenge as Pinal County continues to grow and change.

Pinal County is a place where history, culture and heritage are the foundation for its future. Pinal County will be seen as a leader in environmental stewardship and conservation practices by ensuring that the natural environment is preserved, yet still available to be discovered. Pinal County provides quality educational and training opportunities placing residents in cutting edge, environmentally-compatible jobs within the County. While communities within Pinal County retain and celebrate their unique qualities, governments and agencies share a collaborative spirit to ensure successes across Pinal County and remain responsive and accountable to their constituents.

Sense of Community—Pinal County is a collection of unique communities, each of which has something special to offer residents and visitors. Balancing emerging urban centers and Pinal County's rural character is important to residents; ensuring that the threads of Pinal County's history, heritage, and culture are woven into its future is what makes Pinal County unique from other regions. Ensuring places exist for people to gather and for communities to showcase the diversity of places, people, lifestyles, cultures, and opportunities will help to define Pinal County's identity.

The proposal:

☒ Is consistent with the **Sense of Community** vision component

Please explain:

The Project is in the Moderate Low Density Residential and Open Space land uses. Parcels adjacent to the Project are designated as Medium Density Residential, Employment, General Commercial, and Moderate Low Density Residential. The Project is in the immediate vicinity of agricultural and industrial uses. The Proposed Project Footprint would not be suitable for residential use because the surrounding land uses discourage a sense of community and can generate health hazards that would make the surrounding area not desirable for residential development (see Section 3.2.3 of the *Application for a Major Comprehensive Plan Amendment Narrative Report* for additional information).

Mobility and Connectivity—Ensuring Pinal County has adequate transportation corridors and a variety of multimodal transportation options addressing all populations is essential for moving goods and people throughout the County and State with minimal affect on Pinal County’s native wildlife. Offering multiple mobility and communication options, to effectively connect communities and activity centers throughout the County, will reduce congestion and improve air quality while enhancing the area’s quality of life.

The proposal:

☒ Is consistent with the **Mobility and Connectivity** vision component

Please explain:

The Project would require an access road network, which would consist of existing primary access roadways (North Attaway Road and Quail Run Lane) and the construction of internal private access roads that may lead up to these primary access roadways. The Project would be accessed entirely through the primary access roadways. Newly constructed roadways would be internal to the Project site and developed in accordance with state or local building requirements as needed.

Economic Sustainability—Expanding opportunities for residents to live, work, learn, and play in close proximity promotes long-term economic viability. Pinal County desires activity centers that serve the current and future residents’ needs offering services, businesses and employment opportunities, including high-tech and environmentally-friendly employers who champion Pinal County’s conservation philosophy. The creation of the full range of quality jobs that allow residents to start their career, raise a family, and move up instead of out of Pinal County for career advancement is essential. (This may not apply to all projects)

The proposal:

☒ Is consistent with the **Economic Sustainability** vision component

Please explain:

The amendment would further promote economic diversity and employment opportunities in the area by providing direct and indirect employment during the construction and operational life of the Project. Additionally, power generated by the Project could potentially support residential growth and job creation by providing clean, safe, affordable, and efficient electricity to local communities and the region. The Applicant estimates that a peak of 375 to 425 workers per day would be employed to construct the Project. It is anticipated that the majority of these workers could be hired from within a 100-mile radius or less of the Project. The Project would employ up to three full-time workers during operation

Open Spaces and Places—Residents value the large connected open spaces and unique places of Pinal County, not only as part of their quality of life, but as an important resource to sustain the region’s immense wildlife habitat and their corridors. From the majestic mountains rising from the desert floor in the west to the high desert and rugged mountain terrain to the east, enjoyment of and respect for the natural surroundings is a big part of why people choose Pinal County to live and visit.

The proposal:

☒ Is consistent with the **Open Spaces and Places** vision component

Please explain:

The Project includes approximately 50 acres of Open Space land and is immediately adjacent to a Proposed Multi-Use Trail Corridor. These Recreation/Conservation areas are part of Open Space #4 (OS 4). The Applicant will not build the Project in the riparian resources/high-quality habitat associated with the Gila River. Therefore, the Project does not conflict with the intent of the OS 4 designation. The Applicant has incorporated appropriate setbacks (see Section 3.2.6 of the *Application for a Major Comprehensive Plan Amendment Narrative Report* for additional information)

Environmental Stewardship—People value the views of the mountains and open vistas during the day and the stars at night. These values have translated to a strong conservation ethic that stresses the importance of maintaining the quality of Pinal County’s natural resources for future generations. Pinal County is the leader in environmental stewardship, and rewards and encourages sustainable practices such as innovative land use planning, sustainable agriculture, water conservation, green building development, and the use of renewable and alternative energy sources.

~~The~~ proposal:

☐ Is consistent with the **Environmental Stewardship** vision component

Please explain:

The amendment is consistent with the Environmental Stewardship vision component. Throughout initial Project planning, the Applicant has considered potential environmental impacts in their Project plans and is committed to minimizing impacts to the human, natural, and cultural environments resulting from the proposed development. For example, the Applicant identified the 100-year floodplains associated with the North Side Canal and the Gila River, and immediately redesigned the Project to avoid impacting the areas. The Project will comply with any and all applicable federal, state, and local laws, regulations, and guidelines, as required.

Healthy, Happy Residents—Access to quality healthcare and healthy lifestyle choices is a priority. Pinal County is a healthy, safe place where residents can walk or ride to activity centers and where interaction in Pinal County’s clean, natural environment is encouraged. Ensuring residents are healthy, safe and happy in their community is a priority for Pinal County.

The proposal:

☒ Is consistent with the **Healthy, Happy Residents** vision component

Please explain:

The Applicant is committed to paying its proper and reasonable share of the costs of new infrastructure, services and other public improvements that may be required for the Project. The Project would generate revenues and contribute to the tax base for Pinal County, and would allow for the contribution of clean, safe, affordable, and efficient energy to the regional transmission grid.

Quality Educational Opportunities—Quality, community-based Pre k-12 programs that provide youth with a competitive edge along with a wide variety of post-secondary educational opportunities and technical or specialized workforce training are necessities. Pinal County residents seek out life-long opportunities that help to expand their minds and diversify their experiences. (This may not apply to all projects)

The proposal:

☒ Is consistent with the **Quality Educational Opportunities** vision component

Please explain:

The Applicant does not anticipate that this vision component would apply to this Project because no educational opportunities are associated with it.

PART TWO

Consistency with the Plan's Key Concepts illustrated on Land Use, Economic, and Circulation graphics

Consistency with the Land Use Designation shown on the graphics

The project land uses:

- ☒ Are shown as indicated on the Land Use and Economic Development graphic
- ☐ Are not shown as indicated on the Land Use and Economic Development graphic

Land uses in the study area are designed as Very Low Residential, Moderate Low Density Residential, Medium Density Residential, High Density Residential, Employment, General Commercial, General Public Facilities/Services, Open Space and Major Open Space as indicated on the Land Use and Economic Development graphic. This application for a proposed MCPA is requesting to change the land use designations from Moderate Low Density Residential and Open Space to Green Energy Production and Open Space. The Applicant is requesting the proposed land use designation for the Project parcels. The land use change would be consistent with supporting public utility infrastructure and energy facility uses in the study area, including the the Arizona Public Service (APS) or the Salt River Project (SRP) existing transmission lines.

Consistency with the Mixed Use Activity Center Concept

The project land uses:

- ☐ Meet the Mixed Use Activity Center requirements
- ☒ Are not shown within a Mixed Use Activity Center

If shown within a Mixed Use Activity Center, explain how it meets the planning guidelines outlined in the Land Use element.

N/A

The land use proposal includes a Mixed Use project, not shown in a Mixed Use Activity Center; explain how it meets the planning guidelines and intent of the Plan.

N/A

Consistency with the Planning Guidelines described in the Land Use element

The project land uses:

- ☒ Are consistent with the applicable Planning Guidelines described in the Land Use element

Although the Proposed Project Footprint is intended for residential use and population projections suggest the demand for residential housing may increase in the area over the long term, the intended land use for this area would not be suitable for varying intensities of residential-style development because the parcels surrounding the Project include existing heavy industrial uses and agricultural uses. It is not appropriate for the Proposed Project Footprint to be considered for residential development because 1) residents of the Project may experience negative health impacts from the nearby heavy industrial uses, and 2) residents of the Project may experience a decreased quality of life.

Quality Employment Opportunities County-wide

The Comprehensive Plan stresses the importance of increasing the number of opportunities to locate quality jobs County-wide in order to increase the jobs-to-population ratio.

The proposal:

- ☒ Is consistent with the Economic Development element
- ☒ Includes additional information about how the development addresses the Economic Development Vision embodied in the Comprehensive Plan.

Please explain:

The Applicant estimates that a peak of 375 to 425 workers per day would be employed to construct the Project. It is anticipated that the majority of these workers could be hired from within a 100-mile radius or less of the Project. The Project would employ up to three full-time workers during operation. The Project would further promote economic diversity and employment opportunities in the area by providing quality jobs during the construction and operational life of the Project.

Viable Agriculture, Equestrian and Rural Lifestyle

Historically, agriculture has played an important role in Pinal County's economy and lifestyle. Encouraging the continuation of viable agriculture and protecting it is an important component of the Plan. Additionally, supporting an equestrian and rural lifestyle has a place in Pinal County as it continues to urbanize.

The proposal:

- ☒ Clusters development to protect open space and agriculture
- ☐ Includes additional information about how the development addresses Viable Agriculture, Equestrian, and Rural Lifestyle.

Please explain:

The amendment would cluster industrial development into an area that now supports many existing industrial uses, thus limiting dispersed impacts to open space and agriculture, or sprawl.

System of Connected Trails and Preservation of Open Space

Pinal County is committed to the preservation of large swaths of open space and the development of a connected system of trails. This applies to all projects/proposals/actions.

The proposal:

- ☒ Is consistent with *Pinal County Trails and Open Space Master Plan* and Comprehensive Plan Open Space and Places Chapter
- ☒ Includes additional information about how the development addresses the open space Vision and goals

Please explain:

The Applicant has incorporated the open space and trail considerations into the Project. The suitability of activities for OS 4 is the preservation of high-quality habitat areas located along the Gila River. The Applicant has avoided this high-quality habitat and would avoid development in this area. The surrounding land uses are industrial and agricultural uses, making it unlikely that the Project would detract from any sort of "connected" trail or open space plan or vision for the surrounding area. The Applicant has considered ecological factors and cultural resources as part of the Project. The topography for the Project is relatively flat and would not impact the topography in the immediate area of the Gila River. Please see the *Application for a Major Comprehensive Plan Amendment Narrative Report* for additional information.

Natural and Cultural Resource Conservation

The Comprehensive Plan strives to protect natural/cultural resources, wildlife corridors and environmentally-sensitive areas such as mountains and foothills, major washes, and vistas. These areas are predominantly undeveloped and contain sensitive resources or natural hazard areas.

The proposal:

- ☒ Address environmentally sensitive areas it may impact.
- ☒ Includes additional information about how the development addresses the natural and cultural resource conservation.

Please explain:

The Applicant has considered potential environmental impacts of the Project and would mitigate impacts to the natural and cultural environment by minimizing ground disturbance where possible. Development of the Project would comply with all applicable federal, state, and local environmental laws, regulations, and guidelines, as required. Based on preliminary review, the Proposed Project Footprint is in an area with minimal sensitive environmental resources present. Detailed environmental studies, including pedestrian biological and cultural/archaeological surveys, of the Proposed Project Footprint have been completed and documented.

Water Resources, Public Facilities/Services, and Infrastructure Support

All developments must bring adequate water resources and the necessary infrastructure to support the intensity of development in order to minimize the impact on the County's ability to provide public services. All development and growth, public and private, must acknowledge its impacts and pay its own way.

The proposal:

- ☒ Ensures that adequate public facilities are in place or planned for within a reasonable time of the start of the new development

Please explain:

The Project has accounted for adequate services being in place or planned for within a reasonable time after the start of the Project. The Pinal County Sheriff's Office provides law enforcement services to the Project. The Regional Fire and Rescue Department provides subscription-based fire and emergency medical services to the region. New or additional public services resulting from the Project are not anticipated. No public expenditures for improvements to roads, sewer systems, or water systems would be needed as a result of the Project.

Application for a Major Comprehensive Plan Amendment Narrative Report Z-PA-086-22

Cameron Solar Project

August 2022

Prepared for


PINAL COUNTY
WIDE OPEN OPPORTUNITY
Pinal County Planning Division
85 N. Florence St, First Floor
Florence, AZ 85132

Prepared by

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350 Indiana Street, Suite 500
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On Behalf of


**AVANGRID
RENEWABLES**
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Portland, OR 97209

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Appendix A: ALTA Survey

Appendix B: Site Plan and Proposed Land Use Designations

Appendix C: AZGFD Online Environmental Review Tool Results and Project Evaluation Program Letter

Appendix D: Neighborhood Meeting Report

Acronyms and Abbreviations

AADT	Average Annual Daily Traffic
ACC	Arizona Corporation Commission
ADOT	Arizona Department of Transportation
AZGFD	Arizona Game and Fish Department
ALTA	American Land Title Association
APN	Assessor's Parcel Number
Applicant	Avangrid Renewables LLC
APS	Arizona Public Service
CEC	Certificate of Environmental Compatibility
Comprehensive Plan	2019 Pinal County Comprehensive Plan
GR	<i>General Rural</i> District
I-3	<i>Industrial Zoning</i> District
IPaC	Information for Planning and Consultation
kV	kilovolt
MBTA	Migratory Bird Treaty Act
MCPA	major comprehensive plan amendment
MPA	Municipal Planning Area
MW	megawatt
NRHP	National Register of Historic Place
O&M	operations and maintenance building
OS 4	Open Space #4
PLSS	Public Land Survey System
Project	Cameron Solar Project
PV	photovoltaic
RAZ	Regional Analysis Zone
SGCN	species of greatest conservation need
SHPO	State Historic Preservation Office
Tetra Tech	Tetra Tech, Inc.

1.0 INTRODUCTION

Aurora Solar LLC, a wholly-owned subsidiary of Avangrid Renewables LLC (the Applicant), is requesting a major comprehensive plan amendment (MCPA) to the 2019 Pinal County Comprehensive Plan (Comprehensive Plan) in order to construct, operate, maintain, and decommission the proposed Cameron Solar Project (Project), a photovoltaic (PV) solar facility comprising of five parcels (Figure 1, Project Area). Table 1 below lists the Project parcels, including the Assessor's Parcel Numbers (APNs), individual and total parcel acreage, and Public Land Survey System (PLSS) locations. An American Land Title Association (ALTA) survey for the Project (Appendix A) and a site plan (Appendix B) is included as a part of this narrative report.

Although the Exhibit A, Legal Description in the Project Agency Authorization includes seven parcels, the Applicant is not requesting two parcels land use designations be changed as part of this major comprehensive plan amendment (parcels 209-02-003-00 and 209-02-004-09). Therefore, these parcels are not discussed in this narrative report or included in Table 1.

Table 1. Proposed Comprehensive Plan Amendment Parcels

APN	Acreage	Description
209-02-001-02	504.06	ALL OF SEC 1-5S-8E EXC S1/2 SW & S-722' OF SE (X) 504.06 AC
209-02-002-01	62.19	S1/2 SW OF SEC 1-5S-8E LYING N OF N BANK OF GILA RIVER BANK (3) 62.19 AC
209-02-005-08	7.84	S-722' OF SE OF SEC 1-5S-8E LYING N OF N BANK OF GILA RIVER (4) 7.84 AC
209-03-001-00	278.93	N1/2 OF SEC 2-5S-8E LESS LOT 4 278.93 AC (7)
209-03-002-09	35.04	LOT 4 OF SEC 2-5S-8E LYING S OF RR (2) 35.04 AC
Total Acreage	888.06	-

Source: Pinal County 2022a

The Project would include a PV solar facility with an output of up to approximately 100 megawatts (MW). A battery energy storage facility will also be developed with the PV solar field as part of the Project. Additionally, the Project would require ancillary facilities. The Project would be developed in a smaller footprint than the Project Area (Figure 1, Proposed Project Footprint) mainly to avoid the Gila River and associated 100-year floodplain. A 1-mile study area around the Project to show the existing land use (Figure 2) and future land use (Figure 3) has been identified to provide context of the Project as it relates to land uses. Other items outside of the Project that have still been considered in the analyses for this MCPA pre-application, such as roadways, are referred to as the Project vicinity. Site topography is shown in Figure 4.

Paved and unpaved rural roads provide access to the Project and adjacent properties. These roads include North Attaway Road, running north to south near the eastern boundary of the Project; East Palmer Road, running east to west near the northern boundary of the Project; Quail Run Lane, running north to south and east to west in the Project; and North Christensen Road, running north to south

near the western boundary of the Project. The intersection of North Attaway Road and State Route 287 is approximately 1.1 miles south of the Project. However, the main access roads for the Project are anticipated to be North Attaway Road and Quail Run Lane (Appendix B).

The amendment is needed to facilitate development of the PV solar facility and ancillary facilities, in turn allowing the contribution of clean, safe, affordable, and efficient energy to the regional transmission grid to the Arizona Public Service (APS). The Applicant's Project would also help APS meet their commitment made in January 2020 to provide 65 percent clean energy by 2030 and 100 percent carbon-free energy by 2050 (APS 2020). Additionally, this amendment is also needed because the Applicant has entered into an interconnection agreement with APS for the Project, which legally necessitates that the Project be commercially operated by a certain time. The proposed interconnection of the Project is currently being reviewed, but may include tying directly into the APS or the Salt River Project (SRP) existing transmission lines that are in close proximity to the Project (Figure 1). The Project would be built a single phase that would take approximately 12 to 18 months to construct, with a planned commercial operation date of December 31, 2025. The Project would be operational for 40 years. To meet the commercial operation date of December 31, 2025, the Applicant must submit the formal MCPA application for the 2022 calendar year for consideration by Pinal County.

1.1 Proposed Land Use

The Comprehensive Plan land use designation for the majority of the Project is Moderate Low Density Residential, with a portion of southeastern portion of the Project designated as Open Space. The proposed land use designation for the Project is Green Energy Production and Open Space. Additionally, the Applicant is requesting that an approximate 14.7 acres of the southwestern portion of APN 209-02-001-02 that is within the floodplain go from the land use designation Moderate Low Density Residential to Open Space. The requested land use designations are shown in Appendix B. The Applicant is requesting the proposed land use designation for the Project parcels (Table 1).

1.2 Location and Accessibility

The Project is located within unincorporated Pinal County and is adjacent to the town of Florence and 0.5 mile north of the city of Coolidge. The Project is accessible via multiple routes, including North Attaway Road, East Palmer Road, Quail Run Lane, and North Christensen Road. A Union Pacific Railroad, a major transportation and freight corridor, is located 0.8 mile west of the Project. The Gila River is located immediately south of the Project.

1.3 Site Suitability

The Project is well suited for the proposed changes to the Comprehensive Plan. The Applicant identified the Project as an optimal location for an electrical generation facility based on favorable resources available in Pinal County. These resources include large, generally level areas with a lack of sensitive biological resources, as well as proximity to existing electrical and transmission infrastructure such as transmission lines and substations.

The Applicant has designed the Proposed Project Footprint to avoid impacts to the North Side Canal and the Gila River. The Applicant has also designed the Proposed Project Footprint to avoid the Zone A and Zone AE flood hazard areas that are associated with the Gila River and along the North Side Canal. If impacts to the 100-year floodplains are anticipated to occur, the Applicant will work with the Pinal County Flood Control District to obtain a Floodplain Use Permit prior to construction.

A canal runs west/east through the northeastern portion of the Project that is owned by the San Carlos Irrigation and Drainage District. If impacts to the canal are anticipated to occur, the Applicant will work with the San Carlos Irrigation and Drainage District and obtain the necessary permits or approvals prior to impacting the canal.

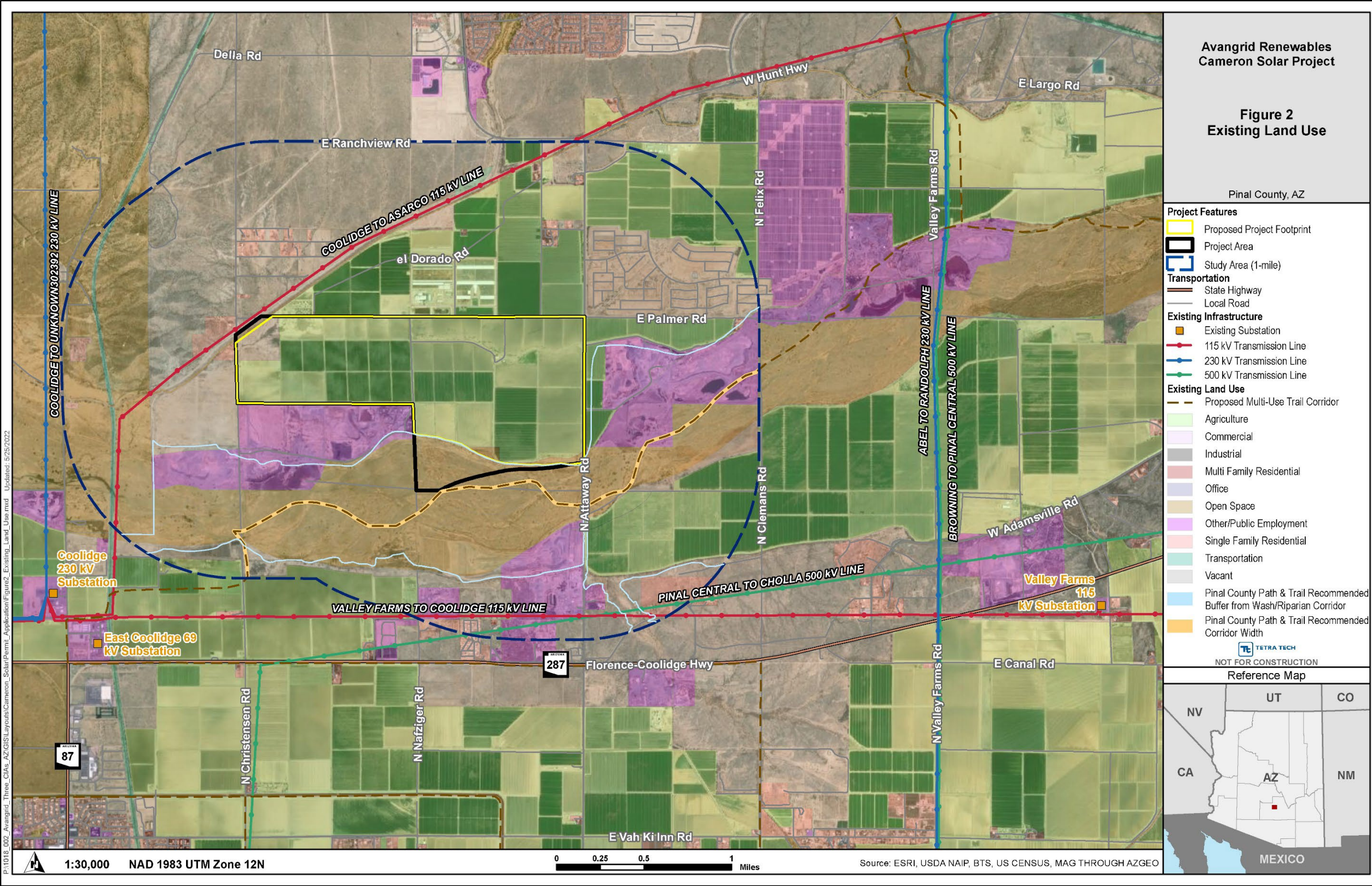
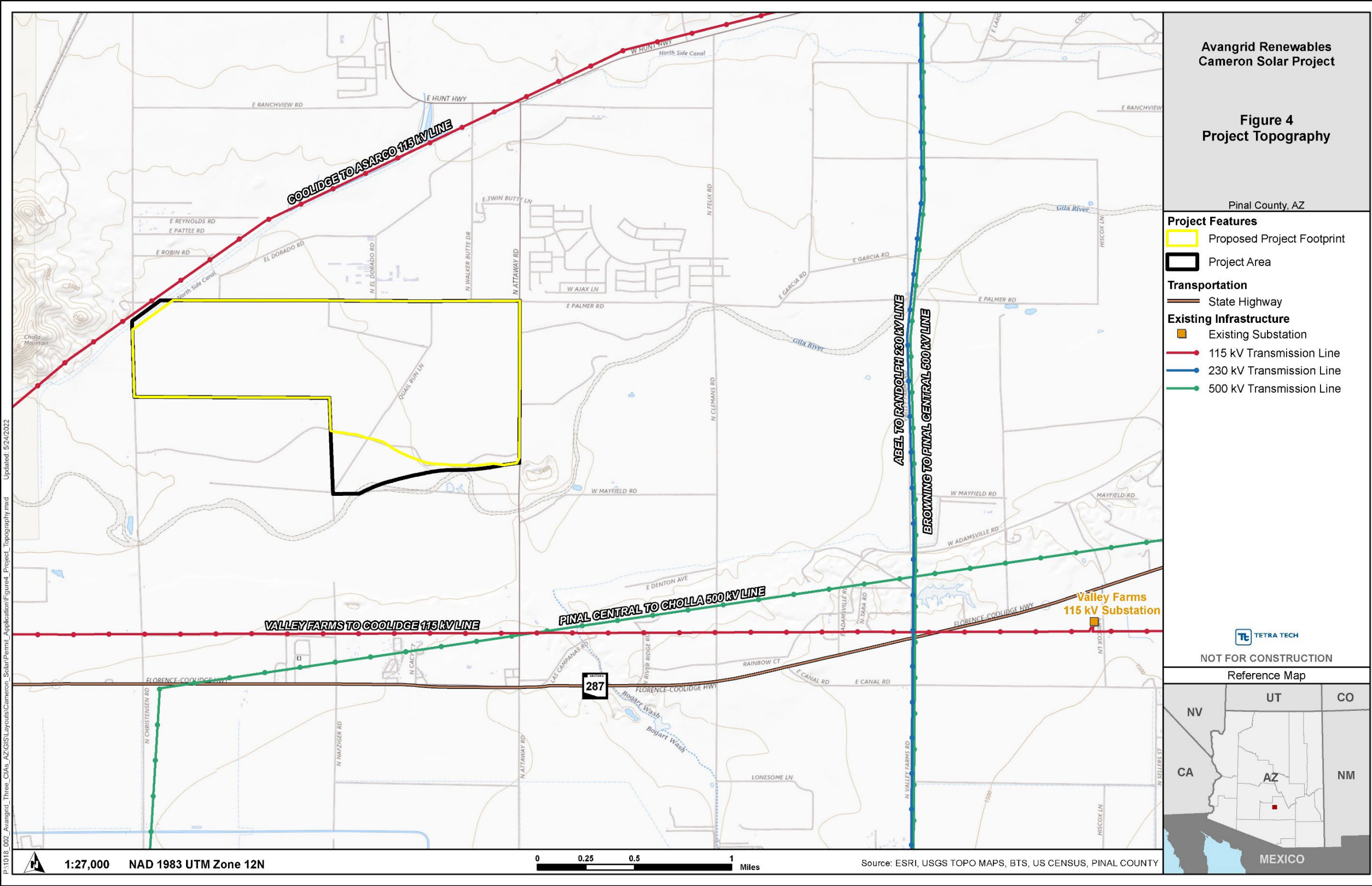


Figure 2. Existing Land Use





near the western boundary of the Project. The intersection of North Attaway Road and State Route 287 is approximately 1.1 miles south of the Project. However, the main access roads for the Project are anticipated to be North Attaway Road and Quail Run Lane (Appendix B).

The amendment is needed to facilitate development of the PV solar facility and ancillary facilities, in turn allowing the contribution of clean, safe, affordable, and efficient energy to the regional transmission grid to the Arizona Public Service (APS). The Applicant's Project would also help APS meet their commitment made in January 2020 to provide 65 percent clean energy by 2030 and 100 percent carbon-free energy by 2050 (APS 2020). Additionally, this amendment is also needed because the Applicant has entered into an interconnection agreement with APS for the Project, which legally necessitates that the Project be commercially operated by a certain time. The proposed interconnection of the Project is currently being reviewed, but may include tying directly into the APS or the Salt River Project (SRP) existing transmission lines that are in close proximity to the Project (Figure 1). The Project would be built a single phase that would take approximately 12 to 18 months to construct, with a planned commercial operation date of December 31, 2025. The Project would be operational for 40 years. To meet the commercial operation date of December 31, 2025, the Applicant must submit the formal MCPA application for the 2022 calendar year for consideration by Pinal County.

1.1 Proposed Land Use

The Comprehensive Plan land use designation for the majority of the Project is Moderate Low Density Residential, with a portion of southeastern portion of the Project designated as Open Space. The proposed land use designation for the Project is Green Energy Production and Open Space. Additionally, the Applicant is requesting that an approximate 14.7 acres of the southwestern portion of APN 209-02-001-02 that is within the floodplain go from the land use designation Moderate Low Density Residential to Open Space. The requested land use designations are shown in Appendix B. The Applicant is requesting the proposed land use designation for the Project parcels (Table 1).

1.2 Location and Accessibility

The Project is located within unincorporated Pinal County and is adjacent to the town of Florence and 0.5 mile north of the city of Coolidge. The Project is accessible via multiple routes, including North Attaway Road, East Palmer Road, Quail Run Lane, and North Christensen Road. A Union Pacific Railroad, a major transportation and freight corridor, is located 0.8 mile west of the Project. The Gila River is located immediately south of the Project.

1.3 Site Suitability

The Project is well suited for the proposed changes to the Comprehensive Plan. The Applicant identified the Project as an optimal location for an electrical generation facility based on favorable resources available in Pinal County. These resources include large, generally level areas with a lack of sensitive biological resources, as well as proximity to existing electrical and transmission infrastructure such as transmission lines and substations.

The Applicant has designed the Proposed Project Footprint to avoid impacts to the North Side Canal and the Gila River. The Applicant has also designed the Proposed Project Footprint to avoid the Zone A and Zone AE flood hazard areas that are associated with the Gila River and along the North Side Canal. If impacts to the 100-year floodplains are anticipated to occur, the Applicant will work with the Pinal County Flood Control District to obtain a Floodplain Use Permit prior to construction.

A canal runs west/east through the northeastern portion of the Project that is owned by the San Carlos Irrigation and Drainage District. If impacts to the canal are anticipated to occur, the Applicant will work with the San Carlos Irrigation and Drainage District and obtain the necessary permits or approvals prior to impacting the canal.



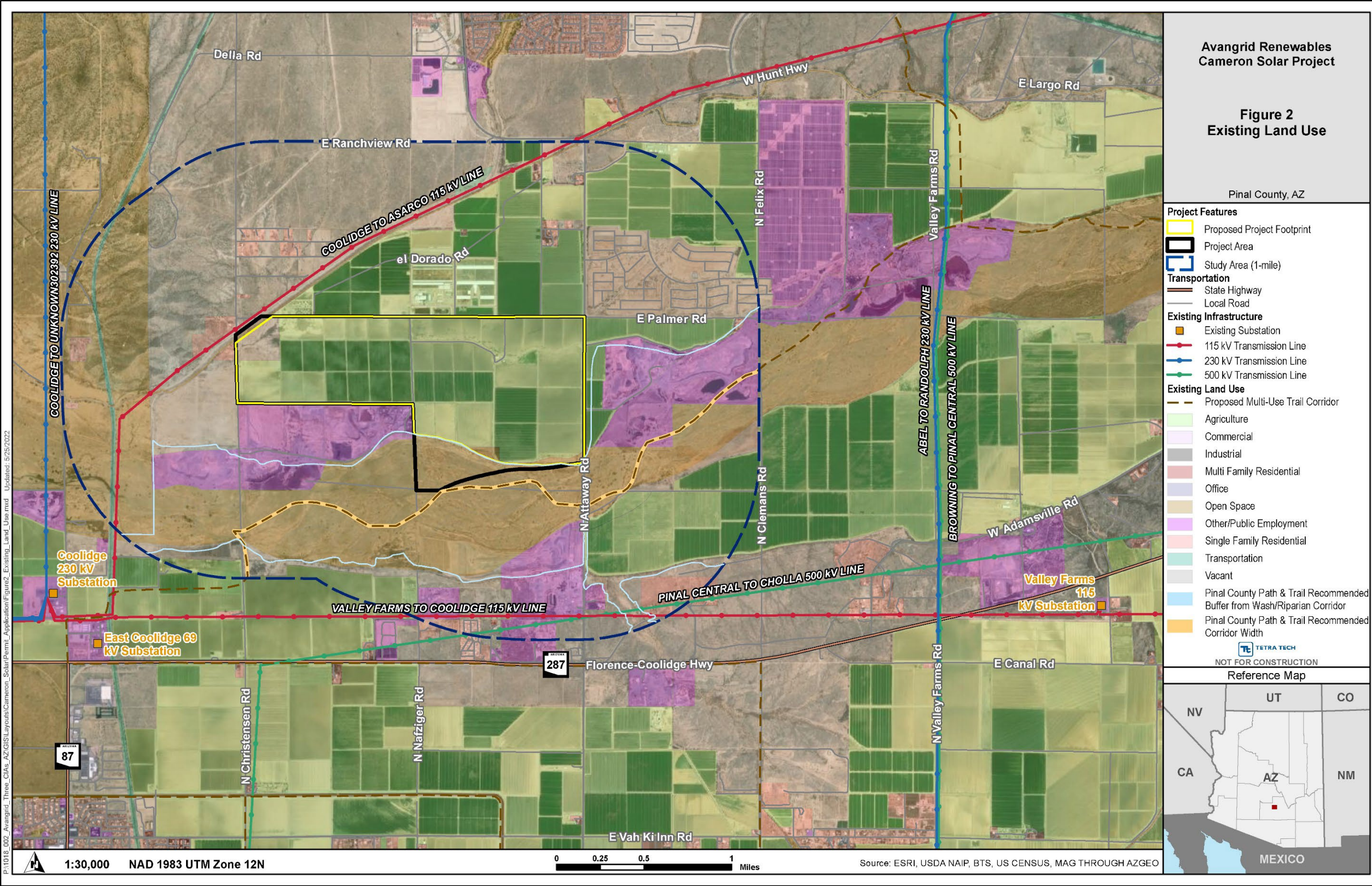
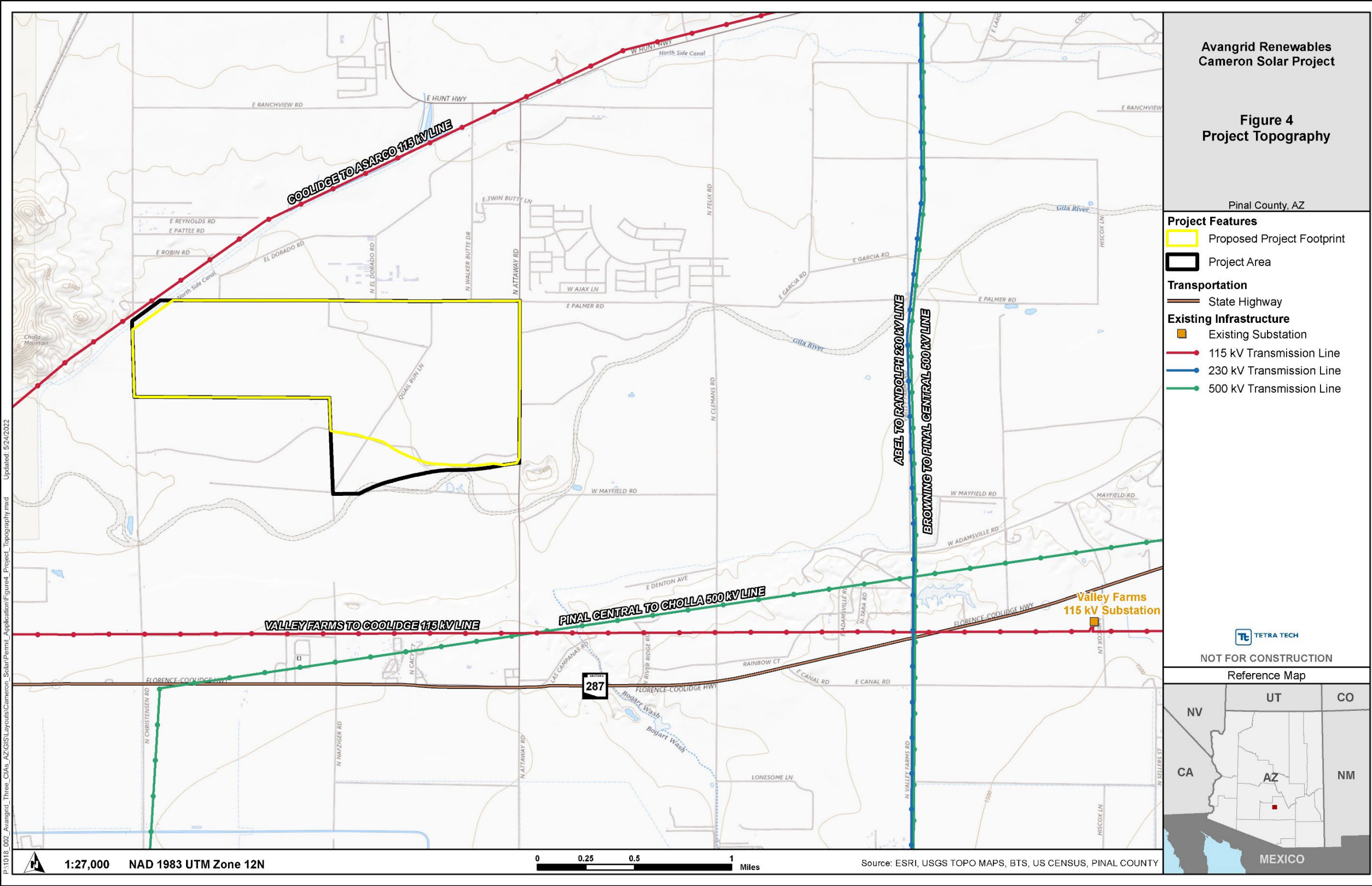


Figure 2. Existing Land Use





The Project is also well-suited based on the considerations discussed in the following subsections.

1.3.1 Solar Resources

Pinal County has a proven solar resource given that other solar projects are successfully operational in the vicinity, including an approximately 300-acre solar facility 1 mile northeast of the Project. Additionally, the Applicant has a proven track record of permitting solar projects in Pinal County, Arizona. An example is the Copper Crossing Solar, a 20MW solar facility in located in the Town of Florence, in Pinal County, Arizona.

1.3.2 Existing Transmission Line Infrastructure

The close proximity to the existing APS and SRP transmission lines, and the Valley Farms Substation, will likely minimize the amount of new off-site transmission lines and facilities required to connect the Project to the electrical grid. Existing transmission lines and substations are shown in Figure 1.

1.3.3 Existing Road Infrastructure

The Project is anticipated to have the easiest and least disruptive means to deliver equipment and workers and reduces the requirements for new road infrastructure construction. As the Applicant continues to develop the Project, the Applicant will determine a streamlined and efficient traffic flow pattern to minimize disruptions to the extent feasible during Project construction. The Applicant would repair any damage caused to existing roads during construction as a result of the Project.

1.3.4 Suitable and Available Land for the Project

The landowner for the Project parcels is interested in partnering with the Applicant.

1.3.5 Remoteness

The Project is remote enough and surrounded by intensive land uses (see Section 1.3.6) to cause minimum disruption to adjacent land use. Visual and noise impacts to humans have been minimized by siting the Project in a largely unpopulated area that has relatively low rates of pedestrian visitation. The nearest major residential development is the Anthem at Merrill Ranch development, which is approximately 3 miles north of the Project. The Whispering Wind development (a mobile home park) is approximately 1.8 miles south of the Project; however, an industrial CEMEX Coolidge Concrete Plant is closer to this development than the Project and would therefore the development would likely experience more visual and noise impacts from this concrete plant than the Project.

1.3.6 Surrounding Land Uses

The Project vicinity is surrounded by existing industrial uses (including the Solterra Materials Coolidge, Hanson Florence Plant, Southwest Rock Coolidge, a CalPortland Plant, and a CEMEX Coolidge Concrete Plant), agricultural uses, and some vacant land. Therefore, the Project Green Energy Production proposed land use designation appears compatible with the existing land uses in the vicinity that are, relatively, the same type of land use (i.e., industrial).

1.3.7 Environmental Constraints

The Applicant has considered numerous environmental constraints (including biological resources, cultural resources, water resources, and public facilities/infrastructure resources) as part of the Project and will continue to consider these environmental constraints as Project design progresses and detailed resource studies are completed. See Section 3.2.7 for detailed information.

1.3.8 Water Use

The Project would use no water resources to generate electricity. Water use during construction would occur over the 12 to 18 months to construct the Project. Estimated water use would range from 300,000 gallons per month to 700,000 gallons per month (or up to 26 acre-feet per year). Much of this water would be used for dust control during construction. The Applicant would obtain water from legally permitted water resources either within the Project or offsite, which would be transported to the site as needed. If required, groundwater/surface water permits would be obtained prior to withdrawing water within the Project.

During operations, water use would be limited to solar panel washing and operations and maintenance building (O&M) needs. Although solar panel manufacturers currently do not recommend routine washing of panels, periodic washing could be needed to optimize performance. If needed during operations, the solar modules could be washed several times per year. If panels at the Project are washed, it is anticipated that on average, 0.5 gallon would be required per module with two washes per module per year assumed, resulting in approximately up to 315,000 gallons of water required per year for panel washing. Water would be sourced from legally permitted water resources either within the Project or offsite and would be transported to the site as needed. If required, groundwater/surface water permits would be obtained prior to withdrawing water within the Project.

For the O&M building, wastewater would be managed using an on-site septic system, and fresh water would be supplied by an existing commercially available well in the area. If no well is available, a new well would be drilled that would use less than 5,000 gallons per day. The Applicant would file a Notice of Intent to Drill with the Arizona Department of Water Resources prior to drilling a new well, and any subsequent permits and requirements would be followed. The Applicant would obtain a Building Permit from the Pinal County Community Development, Building Safety Division, prior to constructing the O&M building.

1.4 Public Services/Utilities

Existing utilities within the study area include APS and SRP transmission lines and the Valley Farms Substation. There are also numerous electrical distribution lines; communications cables; and irrigation canals, laterals, and ditches in the study area (Figure 2).

The Pinal County Sheriff's Office would provide law enforcement services to the Project, and the Applicant would work with Florence and Pinal County to ensure there is adequate fire and emergency medical services for the Project. New or additional public services resulting from the amendment are not anticipated. Water use is described in Section 1.3.8.

2.0 PROJECT NARRATIVE

2.1 Introduction

This narrative report provides the required information to support the Applicant's request for an MCPA for the Project on unincorporated land in Pinal County.

The Applicant is requesting this amendment to construct, operate, maintain, and decommission a PV solar facility shown in Appendix B. The Project would be an electrical generation facility with an output of up to approximately 100 MW. It would also require ancillary facilities. The proposed interconnection of the Project is currently being reviewed, but may include tying directly into the APS or the SRP existing transmission lines that are in close proximity to the Project. The Project and existing electrical infrastructure in the vicinity is most prominently displayed in Figure 4.

Should the MCPA receive approval from Pinal County, the Applicant intends to, at some point, pursue and apply to Pinal County for a zoning change from the *General Rural* District (GR) to *Industrial Zoning* District (I-3) to allow for the development of the Project. A Certificate of Environmental Compatibility (CEC) may be required from the Arizona Corporation Commission (ACC) Line Siting Committee to allow construction of the Project's gen-tie line. If a CEC is required, all requisite environmental studies and public participation activity results for the Project would be compiled, formatted, and incorporated into a CEC application pursuant to the requirements of Arizona Revised Statutes 40-360 et seq. and ACC Rules of Practice and Procedure R14-3-219. The land use plan is one of the factors considered by the ACC in their review of a CEC application; consistency with Pinal County's Comprehensive Plan would be necessary in order to grant a CEC. Completing Pinal County's Comprehensive Plan Amendment process ensures the County's authority and opportunity for review prior to the CEC. The public information process to be conducted for the Pinal County rezoning application process will supplement the Arizona CEC public involvement requirements.

Changing the Comprehensive Plan land use designation from Moderate Low Density Residential and Open Space to Green Energy Production and Open Space, and rezoning the Project from GR to I-3 would allow development of the Project, which would increase the production of energy for delivery to central Arizona where there is an increasing demand for electrical energy. The rezoning of the Project may occur at a later time.

Additionally, a positive economic effect is expected to result from the proposed energy facility development by providing short- and long-term job opportunities in the area, tax benefits to Pinal County, and local economic activity from Project workers' transactions with local businesses. The Applicant estimates that a peak of 375 to 425 workers per day would be employed to construct the Project. It is anticipated that the majority of these workers could be hired from within a 100-mile radius or less of the Project. The Project would employ up to three full-time workers during operation. The operations crew would staff the Project for typical 8-hour workdays, Monday through Friday, with additional hours on weekend shifts as required. The property tax revenues over the life of the Project are estimated to exceed \$10 million.

The primary criteria for determining the location of power generation facilities include the existence of compatible adjacent and nearby land uses, minimal topographic variability, and the proximity to

existing electrical infrastructure. The Project meets all of these criteria because it is surrounded by industrial uses (Figure 2), has been planned for these types of uses in the area (Figure 3), and has minimal topographic variability (Figure 4).

2.2 Physical Settings, Existing Uses, and Relationship to Surrounding Land Uses

The Project is located in unincorporated Pinal County and is adjacent to the Town of Florence and 0.5 mile north of the City of Coolidge. Existing land uses in the study area include agriculture, single family residential, multi-family residential, open space, other/public employment, transportation, and vacant land (Figure 2). The existing land use data is from the Maricopa Association of Governments (2022a).

There is a dairy production facility (Cross Creek Dairy) and agricultural uses, with some scattered residential development located 0.4 mile north of the Project. To the east of the Project, there is agricultural use and heavy industrial use (Southwest Rock Coolidge, a sand and gravel supplier). To the south of the Project, there is vacant land, the Gila River, agricultural lands, and the CEMEX Coolidge Plant, which is a concrete plant. The Whispering Wind development is 0.95 mile south of the Project. To the west of the Project, there is vacant land and the Union Pacific Railroad.

Transportation and travel routes that provide access to the site include North Attaway Road, East Palmer Road, Quail Run Lane, and North Christensen Road. The Applicant is proposing five ingress/egress locations for the Project (Appendix B). Four of these locations are located along Quail Run Lane and one location is along North Attaway Road. The Applicant would obtain the necessary Right-of-Way Use permit from the Pinal County Public Works Department prior to construction if the Applicant works in Pinal County Right-of-Way. The Applicant will prepare a Traffic Impact Statement as requested by the Pinal County Public Works Department during the applicable permitting process.

North Attaway Road is considered a proposed Regionally Significant Route as a principal arterial route. The Applicant will develop the ingress/egress location along North Attaway Road in accordance with the applicable sections of the *Regionally Significant Routes for Safety and Mobility, Final Report* (Pinal County 2008) and the *Pinal County Access Management Manual* (Pinal County 2017) as required.

The Applicant understands that a 75-foot half-street right-of-way dedication is required for North Attaway Road and that a 55-foot half-street right-of-way dedication is required for Palmer Road and Christensen Road. The Applicant anticipates that a 55-foot half-street right-of-way dedication would be required along the Lower Magma Channel structure to connect Palmer Road to Christensen Road. Finally, the Applicant understands that a 50-foot setback is required around the entire Proposed Project Footprint as requested by Pinal County. The Applicant will incorporate these right-of-way dedications and setbacks into future Project designs when appropriate and ensure the applicable permitting processes incorporate these right-of-way dedications and setbacks. All roadway and infrastructure improvements shall be in accordance with the current *Pinal County Subdivision Regulations and Subdivision & Infrastructure Design Manual* or as stipulated (Pinal County n.d.).

Land adjacent to the Project site are mostly privately owned except for a parcel of Arizona State Land Department-administered land to the southwest of the Project. There are no known recreational uses in the Project.

The Project site is zoned as GR, and the land uses entail a combination of active farmland, fallow farmland, and disturbed vacant lands. The Project property is privately owned and contains no residences, but one commercial agricultural building.

3.0 COMPREHENSIVE PLAN AMENDMENT CRITERIA

The overall intent of the Comprehensive Plan is to act as a tool that will serve to “steer the County on a positive course of action to manage growth, preserve the quality of life, and promote sustainability. It is a long-term vision that promotes effective economic vitality while ensuring environmental stewardship. The Plan articulates the vision and outlines the strategic direction to position Pinal as a vibrant, healthy, and economically sustainable region within the state of Arizona” (Pinal County 2019).

To ensure conformity with the Comprehensive Plan, all development proposals must meet the criteria outlined in the Plan’s compliance checklist as found in Appendix A of the Comprehensive Plan (Pinal County 2019). The following sections are provided in response to the criteria listed in the Comprehensive Plan compliance checklist, which is focused on two major components:

- Consistency with Pinal County’s Vision Components, and
- Consistency with the Plan’s Key Concepts illustrated on Land Use, Circulation, and Economic Development graphics.

3.1 Consistency with Pinal County’s Vision Components

As described below, the proposed land use associated with this amendment would be consistent with the vision components, goals, objectives, and policies of the current Comprehensive Plan.

The chapters of the Comprehensive Plan include the following: Sense of Community; Mobility and Connectivity; Economic Sustainability; Open Spaces and Places; Environmental Stewardship; Healthy, Happy Residents; and Quality Educational Opportunities. These chapters are also the vision components and are discussed below with specific responses to the applicable questions included in the Comprehensive Plan compliance checklist found in Appendix A of the Comprehensive Plan (Pinal County 2019).

3.1.1 Sense of Community

Is the proposal consistent with the Sense of Community vision component?

The amendment is consistent with the Sense of Community vision component. Sense of Community is largely achieved by paying close attention to residential and commercial land uses in the area. Densities of development either encourage or discourage a sense of community based on the land uses described in the Comprehensive Plan. According to the Land Use Plan described in Chapter 3: Sense of Community of the Comprehensive Plan, the Project is in the Moderate Low Density Residential and Open Space land uses. Parcels adjacent to the Project are designated as Medium Density Residential, Employment, General Commercial, and Moderate Low Density Residential.

Although the Comprehensive Plan has intended for this area to be mainly residential, the Project is in the immediate vicinity of agricultural and industrial uses. The Project would not be suitable for residential use because the surrounding industrial uses discourage a sense of community and can generate health hazards that would make the surrounding area not desirable for residential development (see Section 3.2.3 for additional information). Therefore, the amendment would be consistent with the Sense of Community vision as described in the Comprehensive Plan by consolidating industrial facilities in an area that contains similar and compatible land uses as well as agricultural land no longer considered viable (see Section 3.2.5 for additional information).

3.1.2 Mobility and Connectivity

Is the proposal consistent with the Mobility and Connectivity vision component?

The amendment is consistent with the Mobility and Connectivity vision component. Chapter 4: Mobility and Connectivity of the Comprehensive Plan explains Pinal County's vision to strive to serve persons with multimodal transportation options in transportation corridors at appropriate locations. Under the goals, objectives, and policies in this chapter, Policy 4.1.1.4 states that "*The County will evaluate the transportation impacts of all proposed Comprehensive Plan amendments and rezonings on Pinal County's regional transportation system*" (Pinal County 2019). Power generation facilities on the Project site would have minimal impact on planned land uses from traffic and the goals that address this vision.

The Project would require an access road network, which would consist of existing primary access roadways (North Attaway Road and Quail Run Lane) and the construction of internal private access roads that may lead up to these primary access roadways. The Project would be accessed entirely through the primary access roadways. Newly constructed roadways would be internal to the Project site and developed in accordance with state or local building requirements as needed. The Applicant will work with the Arizona Department of Transportation (ADOT) and/or Pinal County Public Works Department to preserve the alignments of the existing primary access roadways as applicable. Any roadway improvements would adhere to the applicable sections of the current *Pinal County Subdivision and Infrastructure Design Manual* (Pinal County n.d.).

During the peak commuting hours each morning and evening at the peak of construction, there would be an average of approximately 300 to 340 commuter vehicles arriving at or departing the Project, respectively. During construction of the Project, there will be an average range of 22 to 32 materials delivery truck trips per day. The construction process is estimated to take between 12 to 18 months to complete, during which there would be some variability in the number of workers each day. There is usually about 1 month of initiation and site prep with fewer workers; the middle months that follow ramp up to a higher maximum number of workers. The entire construction process is expected to total approximately up to 70,000 to 90,000 staff vehicle trips and 15,500 material and equipment delivery total trips to the site.

The ADOT Traffic Data Management System and the Maricopa Association of Governments Transportation Data Management System were accessed to obtain Average Annual Daily Traffic (AADT) counts along the Project access route, which represents traffic on a typical day of the year. The AADT for North Attaway Road at two separate locations close to the Project was 8,871 and 8,339 for

2021. No AADT data is available for Quail Run Lane (ADOT 2022; Maricopa Association of Governments 2022b). The Project would represent an approximate 4.5 percent maximum increase in AADT along North Attaway Road, assuming all traffic from the Project ingressed/egressed along North Attaway Road.

During operation, the Applicant anticipates that a total of up to 12 trips per day would occur along primary access roadways. The trip generation during operation of the Project would occur for the operational phase of the Project, which is expected to be 40 years, but may be extended if facility components are upgraded or replaced. During operation, the Applicant anticipates that a total of 12 trips per day would occur along primary access roadways. Therefore, the transportation and traffic impacts associated with the Project operation are anticipated to be minimal (i.e., an approximate 0.1 percent increase in AADT along North Attaway Road, assuming all operational traffic ingressed/egressed along North Attaway Road).

North Attaway Road is considered a proposed Regionally Significant Route as a principal arterial route. The Applicant will develop the ingress/egress location along North Attaway Road in accordance with the applicable sections of the *Regionally Significant Routes for Safety and Mobility, Final Report* (Pinal County 2008) and the *Pinal County Access Management Manual* (Pinal County 2017) if required.

There are expected to be up to two oversized/overweight load deliveries associated with the Project for the transport of new substation equipment. The remaining heavy vehicle traffic would be standard size five-axle tractor trailers—some enclosed, and some in the form of flatbed trucks or smaller vehicles. Smaller heavy vehicles are likely to include water trucks, concrete trucks, and aggregate trucks. The Applicant or their contractor would obtain the necessary oversize/overweight permit from ADOT prior to delivery of these oversize/overweight loads.

3.1.3 Economic Sustainability

Is the proposal consistent with the Economic Sustainability vision component?

The amendment is consistent with the Economic Sustainability vision component. Balancing residential growth with job creation is the central theme of the Economic Development element. The Economic Development element concentrates on the County's ability to provide quality employment opportunities for its residents by setting specific goals, objectives, and policies. Two main goals that address this vision are to:

- Encourage a full range of quality jobs for residents of Pinal County and increase the jobs per capita ratio, and
- Encourage sustainable development consistent with Pinal County's environmental preservation philosophy (Pinal County 2019).

The amendment would further promote economic diversity and employment opportunities in the area by providing direct and indirect employment during the construction and operational life of the Project. Additionally, power generated by the Project could potentially support residential growth and job creation by providing clean, safe, affordable, and efficient electricity to local communities and the region. The Applicant estimates that a peak of 375 to 425 workers per day would be employed to construct the Project. It is anticipated that the majority of these workers could be hired from within a

100-mile radius or less of the Project. The Project would employ up to three full-time workers during operation. These construction employment opportunities are considered an important employment sector for Pinal County (Pinal County 2019). The amendment would be compatible with the vision outlined in Chapter 5: Economic Sustainability of the Comprehensive Plan.

3.1.4 Open Spaces and Places

Is the proposal consistent with the Open Spaces and Places vision component?

The amendment is consistent with the Open Spaces and Places vision component. According to the Comprehensive Plan, siting of specific proposed open space and trails is based on the “suitability of activities, surrounding land uses, ecological factors, topography, viewsheds, and cultural resources” (Pinal County 2019).

The Project includes approximately 50 acres of Open Space and is immediately adjacent to the Open Space land use and adjacent to a Proposed Multi-Use Trail Corridor (Figure 2). These Open Space areas are a part of Open Space #4 (OS 4) as designated in the Open Space and Trails Master Plan (Pinal County 2007). The OS 4 area is approximately 11,600 acres in size and is associated with the Gila River/Wash Corridor. The primary techniques and funding sources identified for OS 4 include fee simple purchase, general obligation bonds, influencing land management decisions, and regulatory techniques (Pinal County 2007).

The OS 4 area was partially designated because of the public’s concern for the natural riparian resources in the eastern portion of the county (Pinal County 2007). It is also stated that the Preferred Concept allows for preservation of high-quality habitat areas located along the Gila River. As shown in the site development plan (Appendix B), the Applicant will not build the Project in the riparian resources/high-quality habitat associated with the Gila River. Therefore, the Project is not conflicting with the intent of the OS 4 designation. Additionally, this portion of OS 4 in the Project is already actively disturbed for agricultural purposes, and any riparian resources/high-quality habitat has already been previously disturbed and degraded.

The purpose of the multi-use trail system is to provide connectivity throughout the county and adjacent recreational areas. The Project is not within this Proposed Multi-Use Trail Corridor and would not impact connectivity or access to recreational areas. An onsite field survey conducted on February 17, 2022 identified an informal compacted dirt trail within this general area. No formal trail infrastructure was identified. The Project may be visible from this Proposed Multi-Use Trail Corridor. The Applicant will work with Pinal County Open Space and Trails Department to minimize visual impacts when possible.

The Applicant notified the Pinal County Open Space and Trails Department of the MCPA application. The Applicant discussed the Project with Pinal County Open Space and Trails Department and provided them with the appropriate contact information if they have any questions or concerns regarding the Project.

The Applicant has reviewed the Pinal County *Open Space and Recreation Area Guideline Manual* as requested (Pinal County 2012) and has determined that the Remote, Multi-Use/Non-Motorized setbacks would apply for the nearby trail (see Table 4 in Pinal County 2012). The Proposed Project

Footprint would not impact the 50-foot recommended corridor width for Remote, Multi-Use/Non-Motorized trails and the Applicant has designed the Proposed Project Footprint to avoid impacting the 25-foot recommended setback for wash/riparian corridors, which starts at the edge of the 100-year floodplain (Figure 2).

The Applicant has met with Pinal County Open Space and Trails Department and Pinal County Community Development Department on August 23rd, 2022. The Applicant and both Departments have agreed that the Project can be developed in the land use designation “Open Space” that is outside of the 100-year floodplain and is within the Project boundary. This area would get redesignated to “Green Energy Production.” However, the Applicant and both Departments also agreed that the land designated as “Moderate Low Density Residential” that is in the Project that is in the 100-year floodplain should be redesignated to “Open Space.” The Applicant would not build the Project in the redesignated “Open Space” area. Any “Open Space” land use designation in the Project boundary that is also within the 100-year floodplain that was not described above previously will remain the “Open Space.” Any “Moderate Low Density Residential” land use designation that is not within the 100-year floodplain would be designated “Green Energy Production.” These proposed land use designation changes are shown on the map provided in Appendix B.

3.1.5 Environmental Stewardship

Is the proposal consistent with the Environmental Stewardship vision component?

The amendment is consistent with the Environmental Stewardship vision component. Throughout initial Project planning, the Applicant has considered potential environmental impacts in their Project plans and is committed to minimizing impacts to the human, natural, and cultural environments resulting from the proposed development. For example, the Applicant identified the 100-year floodplains associated with the North Side Canal and the Gila River and quickly redesigned the Project to avoid impacting these areas. The Project will comply with any and all applicable federal, state, and local laws, regulations, and guidelines, as required.

Current Project design includes the use of PV solar panels, which minimize water use. Solar generation conserves natural resources, and battery energy storage facilitates the integration of renewable resources into the power grid (see Section 3.2.7 for additional information regarding Project natural resource conservation). Minimization of water use and the use of renewable energy sources are both stated elements of the Environmental Stewardship vision of the Comprehensive Plan.

3.1.6 Healthy, Happy Residents

Is the proposal consistent with the Healthy, Happy Residents vision component?

The amendment is consistent with the Healthy, Happy Residents vision component. Factors that contribute to Healthy, Happy Residents include well-designed neighborhoods, the cost of housing and public services, and the availability of healthy foods. Chapter 8: Healthy, Happy Residents of the Comprehensive Plan states the following applicable goals:

- *Goal 8.3: Promote a philosophy that new growth pays for its share of financial impacts in an equitable manner.*

- *Goal 8.4: Maintain long-term financial sustainability for Pinal County* (Pinal County 2019).

The amendment would be consistent with Goal 8.3 because the Applicant is committed to paying its proper and reasonable share of the costs of new infrastructure, services, and other public improvements that may be required for this Project. While no Project-related public expenditures are proposed or anticipated, the Applicant would likely need to develop internal access roads that lead into Pinal County Public Works Department and/or ADOT ROW. Any proposed road construction needed to access the Project would be constructed and paid for by the Applicant, in coordination with Pinal County Public Works Department and/or ADOT as necessary, and would not require public expenditures.

Additionally, the amendment would be consistent with this vision and would contribute to maintaining long-term financial stability (Goal 8.4) by generating revenues and contributing to the tax base for Pinal County, and by allowing the contribution of clean, safe, affordable, and efficient energy to the regional transmission grid.

3.1.7 Quality Educational Opportunities

Is the proposal consistent with the Quality Educational Opportunities vision component?

As stated in the compliance checklist found in Appendix A of the Comprehensive Plan (Pinal County 2019), this vision component may not apply to all projects. The Applicant does not anticipate that this vision component would apply to this Project because no direct educational opportunities are anticipated to be associated with the Project.

3.2 Consistency with the Plan's Key Concepts Illustrated on Land Use, Economic, and Circulation Graphics

3.2.1 Consistency with the Land Use Designation Shown on the Graphics

Land uses in the study area are designed as Very Low Residential, Moderate Low Density Residential, Medium Density Residential, High Density Residential, Employment, General Commercial, General Public Facilities/Services, Open Space, and Major Open Space as indicated on the Land Use and Economic Development graphic (Figure 3). This application for a proposed MCPA is requesting to change the land use designations from Moderate Low Density Residential and Open Space to Green Energy Production and Open Space. The land use change would be consistent with supporting public utility infrastructure and energy facility uses in the study area, including APS and SRP existing transmission lines,

3.2.1.1 Town of Florence Land Use Designations Shown on the Graphics

The *Town of Florence 2020 General Plan* designates the Project as Low Density Residential, Community Commercial (CC), and Open Space (OS), suggesting that Florence may have originally intended the Project to be mainly residential use and some commercial use (Town of Florence 2020) (Figure 5). The study area designations include Rural Ranchette Residential, Low Density Residential, Medium Density Residential, Master Planned Community, OS, Community Commercial, and Employment/Light Industrial (Figure 5).

3.2.1.2 City of Coolidge Land Use Designations Shown on the Graphics

The *City of Coolidge 2025 General Plan: The Future Today* designates a very small portion of the Project and the study area as Rural Ranchette, suggesting the City may have originally intended the study area to be a very low density, rural residential area that conveys a mini-ranch lifestyle (City of Coolidge 2014) (Figure 6).

3.2.2 Consistency with the Mixed Use Activity Center Concepts

The Project is not located within a Mixed Use Activity Center. The nearest Mixed Use Activity Center is a Mid Intensity Activity Center approximately 3.6 miles southeast of the Project.

3.2.3 Consistency with the Planning Guidelines Described in the Land Use Element

The Project land uses are consistent with the applicable Planning Guidelines described in the Land Use element.

The parcels adjacent to the Project are mainly agriculture fields and industrial uses, with some vacant lands and some open space associated with the Gila River. Transmission lines and structures that also cross the study area and converge at the Coolidge substation, the East Coolidge substation, and the Valley Farms substation.

The population projections for the Regional Analysis Zone (RAZ) for the Project (RAZ #394) and surrounding area is provided below (Table 2). The percent change shown in Table 2 was calculated from the 2020 total population.

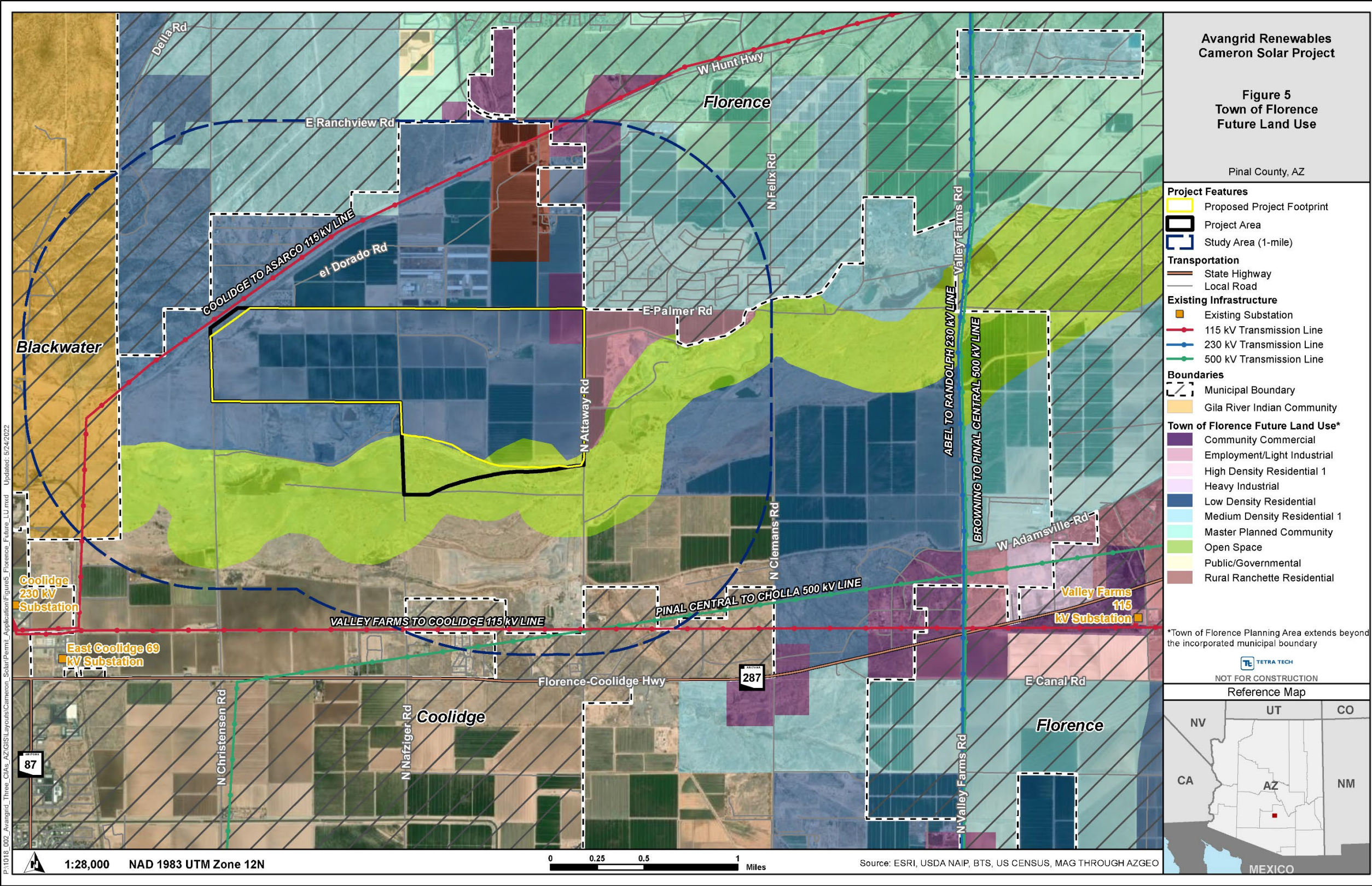


Figure 5. Florence Future Land Uses



Table 2. Population by RAZ near the Project

RAZ	County	Total Population and Percent Change					
		2018	2020	2030	2040	2050	2055
Florence Municipal Planning Area (MPA)							
394 (Project)	Pinal	23,067	25,442	40,993 (61%)	60,148 (136%)	79,211 (211%)	87,315 (243%)
395	Pinal	12,086	12,469	14,926 (20%)	18,643 (50%)	29,224 (134%)	34,905 (180%)
Unincorporated Pinal County MPA							
361	Pinal	2	2	24 (1,100%)	24 (1,100%)	32 (1,500%)	39 (1,850%)
362	Pinal	0	0	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Coolidge MPA							
379	Pinal	834	889	1,611 (81%)	5,815 (554%)	10,414 (1,071%)	13,057 (1,369%)
382	Pinal	12,086	12,602	23,584 (87%)	29,723 (135%)	35,496 (182%)	-

Source: Maricopa Association of Governments 2019

The population projections for the MPAs for the Project and surrounding area is provided below (Table 3). The percent change shown in Table 3 was calculated from the 2020 total population.

Table 3. Population by MPA near the Project

MPA	Total Population and Percent Change					
	2018	2020	2030	2040	2050	2055
Florence	79,400	85,500	120,300 (41%)	160,500 (88%)	209,900 (145%)	231,400 (171%)
Unincorporated Pinal County	66,800	68,600	79,100 (15%)	93,700 (37%)	110,800 (62%)	122,700 (79%)
Coolidge	16,704	17,360	40,737 (135%)	84,066 (384%)	123,756 (613%)	-

Source: Maricopa Association of Governments 2019

These population projections suggest that the Project RAZ (#394) is likely to experience faster population growth than the Florence Municipal Planning Area (MPA). There are only three RAZs for Florence, and RAZ #394 is located towards central Florence. The Coolidge RAZs near the Project are likely to experience slower growth than the Coolidge MPA. The Unincorporated Pinal County RAZs near the Project have small total population numbers, suggesting that overall the population growth in the RAZs near the Project would be small compared to the total population of growth of Unincorporated Pinal County overall.

Although the Project is intended for residential use and population projections suggest the demand for residential housing may increase in the area over the long term, the intended land use for this area would not be suitable for varying intensities of residential-style development because the parcels surrounding the Project include existing heavy industrial uses (including the Solterra Materials Coolidge, Hanson Florence Plant, Southwest Rock Coolidge, a CalPortland Plant, and a CEMEX Coolidge Concrete Plant) and agricultural uses. Given the proximity of these industrial uses, residential development would be unsuitable for several reasons. Residents in proximity to concrete

batch plants may experience higher levels of particulate matter and volatile organic compounds, which may create health hazards for residents that live in the area (Olin 2020). Statements in the article indicate that particulate matter levels can be severe enough to deter residents from going outside and rooftops and cars become covered in dust (Olin 2020). Therefore, it is not appropriate for the Project to be considered for residential development because 1) residents of the Project may experience negative health impacts from the nearby heavy industrial uses, and 2) residents of the Project may experience a decreased quality of life.

The Applicant has consulted with the Town of Florence and the City of Coolidge regarding the Project and they have indicated that they will not be actively participating in the Project permitting because the Project is in unincorporated Pinal County.

The Project parcels are suitable for the Project because of their proximity to existing electrical infrastructure, the relatively flat, open topography, and the existing agricultural land uses (suggesting their conversion for the Project would not impact sensitive environmental features because they are not on site and the land is intensively managed).

3.2.4 Quality Employment Opportunities County-Wide

The amendment is consistent with the Economic Development element. The Applicant estimates that a peak of 375 to 425 workers per day would be employed to construct the Project. It is anticipated that the majority of these workers could be hired from within a 100-mile radius or less of the Project. The Project would employ up to three full-time workers during operation. The Project would further promote economic diversity and employment opportunities in the area by providing quality jobs during the construction and operational life of the Project. The amendment would be compatible with the vision outlined in Chapter 5: Economic Sustainability of the Comprehensive Plan.

3.2.5 Viable Agriculture, Equestrian, and Rural Lifestyle

The amendment would cluster industrial development into an area that now supports many existing industrial uses, thus limiting dispersed impacts to open space and agriculture, or sprawl. Although much of the Project and vicinity contain active agricultural areas, the ongoing Colorado River drought and water shortage has made using the Project for agricultural uses challenging for the current private landowners.

3.2.6 System of Connected Trails and Preservation of Open Space

The amendment is consistent with the Trails and Open Space Master Plan and Chapter 6: Open Spaces and Places of the Comprehensive Plan.

The Open Spaces and Places chapter of the Comprehensive Plan's vision is to site specific proposed open space and trails based on the "suitability of activities, surrounding land uses, ecological factors, topography, viewsheds, and cultural resources" (Pinal County 2019).

Pinal County's Open Space and Trails Master Plan promotes the quality of life of the region by providing areas of passive and active recreational opportunities, while conserving existing resources

such as natural scenic beauty, view corridors, wildlife habitat, agricultural resources designated at risk, and cultural heritage for the benefit of present and future generations.

The Project includes approximately 50 acres of Open Space and is immediately adjacent to the Open Space land use and adjacent to a Proposed Multi-Use Trail Corridor (Figure 2). These Recreation/Conservation areas are a part OS 4 (see Section 3.1.4 for more detail).

The Applicant has incorporated the open space and trail considerations into the Project. The suitability of activities for OS 4 is to preserve high-quality habitat areas located along the Gila River. The Applicant has avoided this high-quality habitat (Appendix B) and would avoid development in this area. The surrounding land uses are industrial and agricultural uses, making it unlikely that the Project would detract from any sort of “connected” trail or open space plan or vision for the surrounding area. The Applicant has considered ecological factors (see Section 3.2.7.1) and cultural resources (see Section 3.2.7.2) as part of the Project. The topography for the Project is relatively flat and would not impact the topography in the immediate area of the Gila River.

The Applicant notified the Pinal County Open Space and Trails Department of the MCPA application. The Applicant discussed the Project with Pinal County Open Space and Trails Department and provided them with the appropriate contact information if they have any questions or concerns regarding the Project.

The Applicant has reviewed the Pinal County *Open Space and Recreation Area Guideline Manual* as requested (Pinal County 2012) and has determined that the Remote, Multi-Use/Non-Motorized setbacks would apply for the nearby trail (see Table 4 in Pinal County 2012). The Proposed Project Footprint would not impact the 50-foot recommended corridor width for Remote, Multi-Use/Non-Motorized trails and the Applicant has designed the Proposed Project Footprint to avoid impacting the 25-foot recommended setback for wash/riparian corridors, which starts at the edge of the 100-year floodplain (Figure 2).

The Applicant has met with Pinal County Open Space and Trails Department and Pinal County Community Development Department on August 23rd, 2022. The Applicant and both Departments have agreed that the Project can be developed in the land use designation “Open Space” that is outside of the 100-year floodplain and is within the Project boundary. This area would get redesignated to “Green Energy Production.” However, the Applicant and both Departments also agreed that the land designated as “Moderate Low Density Residential” that is in the Project that is in the 100-year floodplain should be redesignated to “Open Space.” The Applicant would not build the Project in the redesignated “Open Space” area. Any “Open Space” land use designation in the Project boundary that is also within the 100-year floodplain that was not described above previously will remain the “Open Space.” Any “Moderate Low Density Residential” land use designation that is not within the 100-year floodplain would be designated “Green Energy Production.” These proposed land use designation changes are shown on the map provided in Appendix B.

3.2.7 Natural Resource Conservation

The proposal addresses environmentally sensitive areas it may impact, as described below.

The Applicant has considered potential environmental impacts of the Project and would mitigate impacts to the natural and cultural environment by minimizing ground disturbance where possible. Development of the Project would comply with all applicable federal, state, and local environmental laws, regulations, and guidelines, as required.

The Project is in an area with minimal sensitive environmental resources present. Detailed environmental studies, including pedestrian biological and cultural/archaeological surveys, have been completed and documented as part of the Pinal County permitting process and the Arizona CEC application process. Results of detailed environmental studies of the Project are described below.

3.2.7.1 Biological Resources

General Wildlife and Field Observations

The Applicant contracted Tetra Tech, Inc. (Tetra Tech) to conduct an onsite biological field survey of the Proposed Project Footprint. The field survey took place on February 17, 2022. The general biological observations from the field survey are provided below.

Land use within the Proposed Project Footprint appears to be limited to agricultural uses, primarily in the form of cultivated croplands. A single farmhouse is situated in the northeast portion of the Project and was the only residence observed. Two industrial operations are adjacent to the Project and included a dairy farm to the north and a cement plant to the south. There is regular road traffic within (to and from the industrial plant) and around (Attaway Road) the Project.

Vegetation within the Proposed Project Footprint consists of a mix of desert scrub and cultivated croplands. The majority of the Proposed Project Footprint is composed of cultivated croplands that were fallow at the time of the habitat assessment. The desert scrub is located in the northwest portion and the southeast portion of the Proposed Project Footprint that abuts the Gila River. Additionally, there are irrigation canals located in the Proposed Project Footprint that were dry during the site visit. No riparian vegetation was present along the irrigation canals.

Sparsely vegetated desert scrub in the northwest corner of the Proposed Project Footprint contains open, flat desert with sparsely scattered shrubs, including desert saltbush and a patch of velvet mesquite trees. The area appears to be intact native desert since there were no signs of it previously being farmed and there was little to no vehicle disturbance. Round-tailed ground squirrels (*Spermophilus tereticaudus*) were present. This area may offer suitable habitat for burrowing owls (*Athene cunicularia*).

The desert scrub habitat situated in the southeast portion of the Proposed Project Footprint that abuts the Gila River is characterized by open desert scrub. Vegetation along the river included Goodding's willow, velvet mesquite, and other sparsely spaced shrubs. Tree height was greater than 10 feet and vegetation density was relatively low with open desert between individual trees/patches. This undeveloped area is moderately disturbed native desert with no signs of it previously being farmed; however, human trash and tire tracks are present. Coyotes (*Canis latrans*) were observed along the Gila River, and this area likely serves as a wildlife corridor. Some portions of this area may offer suitable habitat for burrowing owls.

The hills to the northwest and outside of the Project are undisturbed and contain intact native habitat that is suitable for Sonoran desert tortoise (*Gopherus morafkai*).

Wildlife and plant species observed during the on-site habitat assessment are listed in Table 4. One protected species, bald eagle, was observed perched in a large tree near the farm house within the Proposed Project Footprint. There were four large trees near the farmhouse that are suitable for nesting raptors. No eagle nests or other raptor nests were observed.

Table 4. Species Observed During the On-Site Habitat Assessment

Species	Scientific Name
Wildlife	
Birds	
American kestrel	<i>Falco sparverius</i>
Abert's towhee	<i>Melospiza aberti</i>
Common raven	<i>Corvus corax</i>
Bald eagle	<i>Haliaeetus leucocephalus</i>
Horned lark	<i>Eremophila alpestris</i>
Mourning dove	<i>Zenaidura macroura</i>
White-winged dove	<i>Zenaidura asiatica</i>
Say's phoebe	<i>Sayornis saya</i>
Cooper's hawk	<i>Accipiter cooperii</i>
Killdeer	<i>Charadrius vociferus</i>
Loggerhead shrike	<i>Lanius ludovicianus</i>
Savannah sparrow	<i>Passerculus sandwichensis</i>
Yellow-headed blackbird	<i>Xanthocephalus xanthocephalus</i>
Red-winged blackbird	<i>Agelaius phoeniceus</i>
White-crowned sparrow	<i>Zonotrichia leucophrys</i>
Greater roadrunner	<i>Geococcyx californianus</i>
Red-tailed hawk	<i>Buteo jamaicensis</i>
Mammals	
Coyote	<i>Canis latrans</i>
Desert cottontail	<i>Sylvilagus audubonii</i>
Round-tailed ground squirrel	<i>Spermophilus tereticaudus</i>
Plants	
Trees	
Velvet mesquite	<i>Prosopis velutina</i>
Shrubs	
Desert saltbush	<i>Atriplex polycarpa</i>
Goodding's willow	<i>Salix gooddingii</i>

Federally Protected Species

The U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) system (USFWS 2022a), the Arizona Game and Fish Department (AZGFD) Online Environmental Review Tool (AZGFD 2022a, Appendix C), and recent aerial photography imagery available online (Google Earth 2022), were reviewed to perform a desktop assessment for the potential for federally protected species. No designated or proposed critical habitat for federally protected species is known to occur in or within 5 miles of the Project.

The IPaC identifies two listed species and one candidate species with the potential to occur within Project (Table 5).

Table 5. Federally Listed Species with Potential to Occur in the Project

Common Name (Scientific Name)	Category	Federal Listing Status	State Status	Likelihood of Occurrence
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	Bird	Threatened	SGCN 1A	Not expected
Northern Mexican gartersnake (<i>Thamnophis eques megalops</i>)	Reptile	Threatened	SGCN 1A	Low
Monarch butterfly (<i>Danaus plexippus</i>)	Insect	Candidate	SGCN 1A	Low

The yellow-billed cuckoo (*Coccyzus americanus*) is not expected to occur because suitable habitat (riparian cottonwood galleries) do not appear to occur in the Proposed Project Footprint based on review of aerial photography. The other two species have a low likelihood of occurrence because there is only marginally suitable habitat in the Project or vicinity.

As part of the desktop assessment, the AZGFD Heritage Data Management System Environmental Online Review Tool was queried (AZGFD 2022a, Appendix C) to determine whether any federally listed species or SGCN have been documented within 5 miles of the Project (Appendix C). One federally listed species, Gila topminnow (*Poeciliopsis occidentalis occidentalis*), was documented as occurring within 5 miles of the Project (Appendix C) even though the USFWS IPaC system did not identify this species as having the potential to occur within the Proposed Project Footprint.

Gila topminnow use shallow shorelines and slackwater areas of small streams, springs, and marshes. They concentrate in protected inlets, shoreward of sandbars or debris, or associated with aquatic or streamside vegetation. This species prefers shallow warm water in a moderate current with dense aquatic vegetation and algae mats (AZGFD 2020). There are currently 5 known locations of Gila topminnow in Pinal County: Empire Tank, Arnett Creek, Charlebois Spring, West Fork Pinto Creek, and TNC Lower San Pedro River Preserve West Pond (AZGFD 2018). Empire Tank is on Bureau of Land Management-administered lands in the Las Cienegas National Conservation Area, which is over 100 miles southeast of the Project. Arnett Creek is on U.S. Forest Service-administered lands in the Tonto National Forest, which is approximately 18 miles northeast of the Project. Charlebois Spring and West Fork Pinto Creek are on U.S. Forest Service-administered lands in the Tonto National Forest in the Superstition Wilderness, which is approximately 18 miles northeast of the Project. The TNC Lower San Pedro River Preserve West Pond is located on private property in the San Pedro River floodplain near Dudleyville, Arizona, which is approximately 43 miles east of the Project (AZGFD 2018).

The Proposed Project Footprint is not within any of these 5 locations and lacks suitable habitat for Gila topminnow. Therefore, the Applicant anticipates that no impacts to Gila topminnow would occur.

The Applicant may consult directly with the USFWS regarding federally listed species that may occur or are known to occur on the Proposed Project Footprint and are protected under the Endangered Species Act if needed.

Other Federally Protected Species

Migratory Birds

Wildlife species protected under the MBTA include all bird species native to the United States or its territories. Numerous species protected by the MBTA are expected to forage and nest in the Proposed Project Footprint and/or migrate through the Proposed Project Footprint.

The Applicant would comply with the MBTA when constructing, operating, and maintaining the Project.

Bald Eagle

The bald eagle's breeding range is expanding, and riparian areas with large trees within and near the Proposed Project Footprint could provide suitable nesting habitat. However, the lack of suitable foraging habitat and nest trees within the Proposed Project Footprint indicate that the likelihood that bald eagles will use the Proposed Project Footprint for foraging or nesting is low. Although a bald eagle was observed during the habitat assessment, the lack of bald eagles observed in nearby Christmas Bird Counts (CBCs), Breeding Bird Survey, and ebird surveys (ebird 2022) indicate low bald eagle activity in the area (Sullivan et al. 2009; Audubon 2022; Sauer et al. 2017).

The Applicant would comply with the Bald and Golden Eagle Protection Act when constructing, operating, and maintaining the Project.

Golden Eagle

According to the annual nesting reports put out by AZGFD, several golden eagle nest sites have been identified in Pinal County (AZGFD 2022b). Although there are a few large trees in the Proposed Project Footprint, there are no cliffs or other suitable nesting structures within the Proposed Project Footprint. Due to the lack of nest structures and the existing level of human activity within and surrounding the Project, it is unlikely that golden eagles will nest in the Proposed Project Footprint. Potentially suitable foraging habitat occurs within the desert scrub in the Proposed Project Footprint. However, because land cover within the Proposed Project Footprint is primarily composed of cultivated croplands, limiting potential foraging opportunity for the species, it is unlikely that golden eagles would use the Proposed Project Footprint for foraging on a frequent basis.

The Applicant would comply with the Bald and Golden Eagle Protection Act when constructing, operating, and maintaining the Project.

State Protected Species

The Arizona Native Plant Law defines four categories of protected native plants: Highly Safeguarded, Salvage Restricted, Salvage Assessed, and Harvest Restricted. No protected native plants of any category were identified as occurring within 5 miles of the Project (AZGFD 2022a, Appendix C).

One species, velvet mesquite, protected by the Arizona Native Plant Law, was observed within the Proposed Project Footprint during the onsite biological field survey.

The Project is located entirely on private lands. Therefore, the Applicant, following State of Arizona requirements, will notify the Arizona Department of Agriculture 60 days prior to clearing activities by submitting the Notice of Intent to Clear Land form to comply with the Arizona Native Plant Law.

Noxious Weeds

The ADA Administrative Code R3-4-245 (ADA 2022) defines three categories of noxious weeds: Class A, B, and C noxious weeds. Class A noxious weeds are categorized as plant species that are not known to exist or that are of limited distribution in the state and are a high-priority pest for quarantine, control, or mitigation. Class B noxious weeds are categorized as plant species that are known to occur but that are of limited distribution in the state and may be a high-priority pest for quarantine, control, or mitigation if a significant threat to a crop, commodity, or habitat is known to exist. Class C noxious weeds are categorized as plant species that are widespread but may be recommended for active control based on risk assessment. No noxious weeds have been observed in the Proposed Project Footprint; however, a Class B noxious weed, Saharan mustard (*Brassica tournefortii*) was observed 0.7 mile east of the Project (iMapInvasives 2022). No other noxious weeds were observed within 2 miles of the Project.

No noxious weeds were observed in the Proposed Project Footprint during the onsite biological field survey.

Arizona Species of Greatest Conservation Need

Arizona's State Wildlife Action Plan (AZGFD 2012) identifies 47 SGCN within Pinal County (AZGFD 2021). SGCN are wildlife species that have been evaluated in terms of their conservation needs and vulnerability and have been determined to be at risk (i.e., vulnerable). Note that the SGCN bird species are protected under the Migratory Bird Treaty Act (MBTA).

Four SGCN have been documented within 5 miles of the Project: Sonoran Desert tortoise (*Gopherus morafkai*, SGCN 1A), western burrowing owl (*Athene cunicularia hypugaea*, SGCN 1B), Gila longfin dace (*Agosia chrysogaster*, SGCN 1B), and desert sucker (*Catostomus clarkia*, SGCN 1B). The Environmental Online Review Tool Report also identifies potentially occurring SGCN based on predicted range models (Appendix C), but these species have not been recorded within or near the Project.

The Applicant has consulted with the AZGFD through the Project Evaluation Program, which provides policy, technical assistance, and environmental law compliance guidance and oversight. The Applicant submitted the request on April 29, 2022 and received a response letter on May 20, 2022. A copy of the response letter is included in Appendix C, and the Applicant has provided a response to the AZGFD recommendations in Table 6 below.

Table 6. AZGFD Recommendations and Applicant Responses

AZGFD Recommendations	Applicant Response
Large-scale solar PV facilities can result in a high rate of bird mortality due to habitat loss, collision with panels, attraction due to an optical illusion of water, and unknown causes (Kosciuch et al. 2020 ²). The Department recommends a qualified biologist survey for bird species within the project area to better understand potential impacts from this project. Adjustments to	A habitat assessment of the Project was conducted by a qualified biologist on February 17, 2022. This included recording all bird observations in the Proposed Project Footprint. Seventeen avian species were recorded in the Proposed Project Footprint.

AZGFD Recommendations	Applicant Response
<p>panel spacing could help break up the illusion of water and reduce bird mortality; research is currently being conducted to assess this mitigation option (Wilkening and Rautenstrauch 2019³). Additionally, surveys for nesting birds should be conducted prior to construction activities that occur during the breeding season. The vegetation within the project area may provide nesting opportunities for avian species that are regulated under the MBTA and protected under state law. Breeding season for birds in this area is generally mid-January through late June. If it is anticipated the project will not be in compliance with MBTA, the Department recommends contacting the U.S. Fish and Wildlife Service (USFWS) for their technical assistance. The USFWS will provide options to comply with the MBTA</p>	<p>In general, the Applicant designs solar facilities optimally to maximize the amount of power produced while minimizing the overall amount of land disturbed. The Applicant designs solar facilities in consultation with engineers who follow the latest industry standards and designs and ensure that the facility meets any additional federal, state, and local requirements and regulations. Numerous environmental factors (such as natural and cultural resources) and land ownership are also considered during solar facility design.</p> <p>Should the panel spacing be increased, then additional land is likely required because the number of solar panels to be installed to generate the required amount of power that is specified in the interconnection agreement (i.e., a legally binding document) with Arizona Public Service (APS) must remain unchanged. Given the other environmental factors in the Project footprint (such as 100-year floodplains and the presence of cultural resources) and land ownership constraints (i.e., there is no other available land contiguous to the Project owned by the same underlying landowner as the Project), the Applicant is unable to meet this request.</p> <p>The Applicant would comply with the MBTA and would conduct surveys for nesting birds prior to construction activities that occur during the breeding season.</p>
<p>The western burrowing owl, a special status species that is regulated under the MBTA, has been documented in the vicinity of your project. The biological resources assessment conducted by Tetra Tech found that suitable habitat might occur within the northwest part of the project area; however, agricultural areas also provide important habitat for this species and should be considered during subsequent assessments. Similarly, this species may be present year-round, rather than just during the summer, as indicated by Table 4 of the biological resources assessment. The Department recommends conducting an occupancy survey for western burrowing owls throughout the project area to determine if this species occurs within your project footprint. Guidelines for conducting this survey are found in Burrowing Owl Project Clearance Guidance for Landowners⁴. Please note that the survey should be conducted by a surveyor that is certified by the Department. If an active burrowing owl burrow is detected, please contact the Department and the USFWS for direction, in accordance with the guidelines.</p>	<p>The Applicant would conduct a pre-construction biological survey to identify any active nests (including western burrowing owl nests) to ensure compliance with the MBTA. The survey would be conducted by a surveyor who is certified by the Department.</p> <p>If any active western burrowing owl nests are detected, the Applicant would follow the avoidance and buffer requirements found in Burrowing Owl Project Clearance Guidance for Landowners. If avoidance of active burrowing owl nests is not possible, the Applicant would work with an appropriate permitted organization to relocate western burrowing owls from the Proposed Project Footprint that cannot be avoided.</p> <p>These strategies would successfully avoid, minimize, and mitigate impacts to western burrowing owls.</p>
<p>Bald eagles, which are regulated under the Bald and Golden Eagle Protection Act (BGEPA), have been documented within the project area. If uncertain about the effects of the project to eagles, or if it is anticipated the project will not be in compliance with the BGEPA, the Department recommends contacting the USFWS for their Technical Assistance, as well as Tuk Jacobson, the Department's raptor expert, at KJacobson@azgfd.gov or 623-236-7575. The USFWS and the Department will provide options to comply with the BGEPA, such as conservation measures to avoid or minimize adverse effects to the eagles.</p>	<p>The Applicant has contacted Tuk Jacobson previously, who has indicated that there are no concerns regarding bald eagles. The Applicant would comply with the BGEPA when constructing, operating, and maintaining the Project.</p>
<p>The Sonoran desert tortoise is covered under a Candidate Conservation Agreement (CCA). The Department recommends conducting surveys within</p>	<p>Pinal County, as the permitting authority for the Project, is not a signatory to the Sonoran desert tortoise Candidate Conservation Agreement. Therefore, it is not</p>

AZGFD Recommendations	Applicant Response
<p>suitable habitat, in accordance with the Desert Tortoise Survey Guidelines for Environmental Consultants⁵, to determine the presence/absence of this species. If tortoises are identified, please refer to and implement the Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat⁶ and Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects⁷.</p>	<p>appropriate to implement the conservation actions for Sonoran desert tortoise specified in the Candidate Conservation Agreement. Additionally, the Sonoran desert tortoise was recently deemed to not be warranted for listing under the Endangered Species Act by the USFWS. There are no federal, state, or local statutory protections for the Sonoran desert tortoise or its habitat for the Project. Therefore, a Sonoran desert tortoise survey is not required and would not inform Project mitigation or requirements since the Applicant is already implementing several of them (described below). The Applicant would not conduct this survey as requested.</p> <p>The Applicant is already inherently implementing some of the measures outlined in the Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat (such as informing Project personnel of potential Sonoran desert tortoise presence, minimizing the Project footprint, and maintaining a sanitary Project site). Additionally, hazards to Sonoran desert tortoise following Project construction would be minimal (i.e., there would be no open trenches, pits, or other features where tortoises could be trapped). However, the Applicant would not implement the entire Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat or any other of the mitigation measures as requested because the other measures would impose impossible construction schedules or interfere with Project design in ways that may comprise the Project site safety or security.</p> <p>The Applicant would train Project construction, operation, and maintenance staff on how to spot Sonoran desert tortoise on the Project site and review the Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects as part of the onsite environmental training.</p>
<p>To the extent possible, the Department recommends retaining habitat features underneath the panels, including vegetation and soils, instead of grading the entire site. The topography in the majority of the site is flat and would require minimal trimming of shrubs and existing vegetation to install the panels. Keeping the existing soil and root structures intact would serve to minimize erosional run-off and help reduce biodiversity loss within the site (Grodsky and Hernandez 2020⁸).</p>	<p>The Applicant's grading of the site is determined through engineering design. The engineering design is guided by several factors and ultimately determines how a solar facility can be built in a given area; it includes following the latest industry standards and designs and ensures that the facility meets any additional federal, state, and local requirements and regulations. The Applicant and its contractors must adhere to these engineering designs to create a safe and secure solar facility. Therefore, the Applicant cannot guarantee that the entire site would not be graded.</p> <p>The Applicant would minimize erosion runoff by obtaining the required permits through the Arizona Department of Environmental Quality.</p>
<p>The Department's Wildlife Compatible Fencing Guidelines⁹ provide 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, such as leaving a 6–8-inch gap between the ground surface and bottom of the fence to allow for smaller wildlife species to move freely</p>	<p>The Applicant is unlikely to consider these guidelines as part of the Project fence design because the Project facility's overall security, security from trespass, and protection against potential acts of terrorism, are paramount. Most fence considerations in these guidelines would compromise the Project security.</p>

AZGFD Recommendations	Applicant Response
through the area and make use of any habitat within the project boundaries.	
Wetland and riparian areas have been mapped and identified within the project area. The Department recognizes riparian habitats as important areas for wildlife, offering vital habitats, resources, and movement corridors. Therefore, the Department actively encourages management practices that will result in the conservation and protection of these areas and recommends considering designs that would avoid, minimize, or mitigate any potential impacts to riparian areas during the planning stage of the project. The Department is available to share our expertise on ways to avoid, minimize, and mitigate any impacts to riparian areas. Additionally, the Department recommends reviewing the Pinal County Comprehensive Plan ¹⁰ (i.e. policies 6.1.2.1 and 7.1.2.4), Open Space and Trails Master Plan ¹¹ , Drainage Ordinance ¹² , and Drainage Design Manual ¹³ as they all identify riparian area considerations, guidance, and policies for Pinal County.	<p>The Applicant has identified, and is avoiding impacts to, the Gila River riparian area.</p> <p>As part of the Major Comprehensive Plan Amendment, the Applicant has already reviewed the Pinal County Comprehensive Plan, Open Space and Trails Master Plan, Drainage Ordinance, and Drainage Design Manual. The Applicant has already addressed or would address considerations, guidance, and policies applicable to the Project as part of the Pinal County permitting process.</p>
Birds of prey such as raptors, owls, vultures, and eagles are vulnerable to electrocution and powerline strikes during construction and operation. There are a number of design features that can minimize these impacts to these important species. Tuk Jacobson is the Department's raptor expert and is willing to share information on best management practices; he can be contacted at KJacobson@azgfd.gov or 623-236-7575. Guidelines have also been established by the USFWS along with the Avian Power Line Interaction Committee (APLIC): Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 ¹⁴ and within the Reduced Avian Collisions with Power Lines: The State of the Art in 2012 ¹⁵ .	<p>Adhering to the APLIC Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 and within the Reduced Avian Collisions with Power Lines: The State of the Art in 2012 will sufficiently reduce electrocution and powerline strikes for the Project.</p> <p>The Applicant would adhere to the APLIC Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 and within the Reduced Avian Collisions with Power Lines: The State of the Art in 2012.</p>
If trenching will occur for the proposed project, the Department recommends that trenching and backfilling crews be close together to minimize the amount of open trenches at any given time. Where trenches 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 slope should be less than 45 degrees (1:1). Trenches that have been left open overnight should be inspected and animals removed prior to backfilling.	The Applicant will consider these guidelines as part of Project construction. Trenching is anticipated to occur as part of the Project.
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 ¹⁶). The Department recommends using only the minimum amount of light needed for safety, especially in areas immediately adjacent to open space or undeveloped lands. Motion sensing lighting and narrow spectrum lighting are preferred, and the Department encourages their use as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.	The Applicant will minimize the amount of night lighting required for the Project. The lighting details are not known at this time; however, the Applicant will consider these recommendations as part of the lighting design.
To help protect native vegetation and wildlife habitat, please employ best management practices to reduce impacts to native vegetation during project construction and maintenance and also to minimize potential introduction of exotic invasive species. Please refer to	No invasive plant species were identified during the February 17, 2022 site visit by a qualified biologist. The Applicant will instruct Project contractors on how to properly identify listed noxious weed species, and will also instruct Project contractors to report the

AZGFD Recommendations	Applicant Response
Arizona's Native Plant Law for regulations and for a list of native plants that are protected. A Native Plant Inventory may need to be conducted to identify, record, and coordinate plant salvage efforts for protected species.	occurrences to the Applicant upon observation. The Applicant will remove any observed listed noxious weed species from the Project site in a timely manner in the least intrusive way possible (i.e., hand or manual removal of plants). The Project is located entirely on private lands, therefore, the Applicant, following State of Arizona requirements, will notify the Arizona Department of Agriculture 60 days prior to clearing activities by submitting the Notice of Intent to Clear Land form to comply with the Arizona Native Plant Law.
To minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects, and pathogens, precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. See the Arizona Department of Agriculture website ¹⁷ for a list of prohibited and restricted noxious weeds and the Arizona Native Plant Society ¹⁸ 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 ¹⁹ , which is a national cloud-based application for tracking and managing invasive species.	The Applicant will instruct Project contractors on how to properly identify listed noxious weed species, and will also instruct Project contractors to report the occurrences to the Applicant upon observation. The Applicant will remove any observed listed noxious weed species from the Project site in a timely manner in the least intrusive way possible (i.e., hand or manual removal of plants).

Note: Footnotes of references cited are included in AZGFD letter (Appendix C).

Wildlife Corridors

Corridors, also referred to as linkages, between blocks of protected habitat are important for wildlife movement to maintain biodiversity and reduce habitat fragmentation. Wildlife linkages have been identified in Pinal County by the AZGFD and several stakeholders (AZGFD 2013). The closest wildlife linkage is approximately 3 miles east of the Proposed Project Footprint (Appendix C). Streams and washes provide natural movement corridors for wildlife and the Gila River was identified as a wildlife movement area.

3.2.7.2 Cultural Resources

A desktop review of AZSITE, Arizona's online cultural resources database, which includes records from the Arizona State Museum, Arizona State University, and the Bureau of Land Management, was conducted to identify previous cultural resources investigations and known cultural resources in the current Project and a 1-mile buffer around the Proposed Project Footprint (the Research Area).

The AZSITE record search identified 12 previously conducted surveys within the Project; these covered about 26 percent of the Project. An additional 42 previous archaeological investigations have been conducted within the Research Area. The AZSITE database search identified three prehistoric archaeological sites and two historic sites within the Proposed Project Footprint. All three prehistoric sites are artifact scatters dated to the Hohokam Classic Period, and have been recommended eligible for the National Register of Historic Place (NRHP) by the recorder but do not have a formal determination of eligibility by the Arizona State Historic Preservation Office (SHPO). The historic sites are Attaway Road, which has been determined ineligible for the NRHP by SHPO, and the historic North Side Canal, which has been determined eligible for the NRHP by SHPO. An additional 23 prehistoric

archaeological sites, nine historic sites, four multicomponent (prehistoric and historic) sites, and six sites of unknown cultural-temporal affiliation, were identified within the Research Area.

The AZSITE search did not identify any previously recorded architectural resources, Traditional Cultural Properties, or any cultural resources that have been listed on the NRHP or Arizona Register of Historic Places within the Proposed Project Footprint or within the Research Area.

The Government to Government Consultation Toolkit (SHPO n.d.) lists the following eight tribes that should be consulted for the Proposed Project Footprint:

- Pueblo of Zuni
- Tonto Apache Tribe
- Gila River Indian Community
- Yavapai-Apache Nation
- White Mountain Apache Tribe
- Pascua Yaqui Tribe
- Hopi Tribe
- Mescalero Apache Tribe

The Applicant contracted Tetra Tech to conduct a cultural resource survey of the Proposed Project Footprint. The field survey took place from February 22, 2022 to February 26, 2022. The survey efforts for the Proposed Project Footprint documented three previously recorded archaeological sites and three newly discovered archaeological sites. One site, AZ AA:3:210 (ASM), has previously been determined not eligible for inclusion in the NRHP and was not redocumented as part of Tetra Tech's 2022 survey. No further management is necessary for AZ AA:3:210 (ASM). In addition, no further management is necessary for the 22 Isolated Finds in the Proposed Project Footprint. Three recommended eligible and three unevaluated cultural resources located in the Project have the potential to be adversely affected by the Proposed Project Footprint. The Applicant will avoid the three recommended eligible and three unevaluated cultural resources to the extent practicable to minimize impacts to cultural resources in the Proposed Project Footprint.

3.2.7.3 Water Resources/Hydrology

Based on the National Hydrography Dataset (USGS 2022), there are 2.17 miles of ephemeral streams or unnamed canals in the Proposed Project Footprint. According to the National Wetlands Inventory database (USFWS 2022b), there are riverine wetlands associated with the Gila River, riverine wetland associated with an unnamed channelized stream flowing east-west on the northern portion of the Proposed Project Footprint, and an approximately 1.3-acre wetland on the northwest portion of the Proposed Project Footprint. The Applicant is avoiding the Zone A and Zone AE flood hazard areas associated with the Gila River and the North Side Canal (as shown on Federal Emergency Management Agency Flood Insurance Rate Map Panel's 0421C0850E and 0421C0875E [12/4/2007] [FEMA 2022]).

The Applicant contracted Tetra Tech to conduct a wetland and aquatic resource survey of the Proposed Project Footprint. The field survey took place on March 8 and 9, 2022. There were four earthen canals that have the potential to be waters of the United States in the Proposed Project

Footprint. No wetlands were found in the Proposed Project Footprint. The Applicant will avoid all four earthen canals to the extent practicable to minimize impacts to potential waters of the United States.

3.2.7.4 Public Facilities/Services and Infrastructure Support

The Project has accounted for adequate services being in place or planned for within a reasonable time of the start of the Project.

The Pinal County Sheriff's Office provides law enforcement services to the Project. The Regional Fire and Rescue Department provides subscription-based fire and emergency medical services to the region. New or additional public services resulting from the Project are not anticipated.

No public expenditures for improvements to roads, sewer systems, or water systems would be needed as a result of the Project. Water use and sources are described in Section 1.3.8. Any newly proposed water infrastructure (such as a new well) would be paid for by the Applicant, in coordination with Arizona Department of Water Resources, and would not require public expenditures.

Any proposed road construction or remediation needed to access the Project would be constructed and paid for by the Applicant, in coordination with ADOT and Pinal County Public Works Department as necessary, and would not require public expenditures.

Development of the Project would not impact existing water quality. The site would be designed to pass off-site stormwater through or around the site and release it in a manner similar to the existing conditions. Based on a final hydrologic analysis of the site, on-site drainage would be routed as necessary to retention basins as required in the applicable sections of the *Pinal County Drainage Manual* and the *Pinal County Drainage Ordinance* (Pinal County 2022b). This drainage design concept would allow the site to be developed, while not increasing stormwater runoff or creating an adverse impact on adjacent properties. Site design that is sensitive to existing topography and drainage patterns would also function to protect water quality. The Applicant would provide a drainage report and drainage plan at the time of Project Site Plan submittal. The Applicant understands that retention of stormwater runoff generated by the site is required.

In areas where there is any potential for contamination, all stormwater would be retained on-site to comply with Arizona Department of Environmental Quality requirements. The Project would comply with the Arizona Pollutant Discharge Elimination System Construction General Permit. In addition, the Project would adhere to the Arizona Department of Environmental Quality Aquifer Protection Program and bi-annual Water Quality Assessment Report, as required by the Clean Water Act.

3.3 Public Involvement

The Applicant held a neighborhood meeting on Monday, May 2, 2022, from 5:00 PM to 6:30 PM at the Anthem Parkside Community Center in Anthem Parkside at Merrill Ranch, in Florence, Arizona. This meeting was held to comply with the Citizen Review process outlined in Chapter 2.166.050, Section E: Citizen Review of the Pinal County Development Services Code (Pinal County 2022c). Detailed information regarding the public outreach efforts in support of the MCPA can be found in Appendix D.

4.0 LITERATURE CITED

- ADA (Arizona Department of Agriculture). 2022. *Noxious weeds*. Available online at: <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>. Accessed February 2022.
- ADOT (Arizona Department of Transportation). 2022. Transportation Data Management System. Available online at: <https://azdot.gov/planning/transportation-analysis/traffic-monitoring>. Accessed February 2022.
- APS (Arizona Public Service). 2020. We're All In for Arizona: Our Clean Energy Commitment. Available online at: <https://www.aps.com/-/media/APS/APSCOM-PDFs/About/Our-Company/Energy-Resources/CleanEnergyReport.ashx?la=en#:~:text=We%20are%20making%20a%20commitment,portfolio%20coming%20from%20renewable%20energy>. Accessed February 2022.
- Audubon (The National Audubon Society). 2022a. 122nd Christmas Bird Count: Map of Active Circles. Available online at: <https://www.arcgis.com/apps/View/index.html?appid=ac275eeb01434cedb1c5dcd0fd3fc7b4>. Accessed March 2022.
- AZGFD (Arizona Game and Fish Department). 2012. Arizona's Wildlife Action Plan. Available online at: <https://www.azgfd.com/wildlife/actionplan/#:~:text=Arizona%E2%80%99s%20State%20Wildlife%20Action%20Plan%20%28SWAP%29%20provides%20a,American%20tribes%2C%20recreational%20groups%2C%20local%20governments%20and%20citizens>. Accessed May 20, 2021.
- . 2013. The Pinal County Wildlife Connectivity Assessment: Report on Stakeholder Input. Phoenix, AZ.
- . 2018. Petition to Reclassify Gila Topminnow, *Poeciliopsis Occidentalis*, From Endangered to Threatened Status. Available online at: <https://ecos.fws.gov/ecp/species/1116>. Accessed April 2022.
- . 2020. Gila Topminnow (*Poeciliopsis occidentalis occidentalis*). Unpublished abstract compiled and edited by the Heritage Data Management System, Arizona Game and Fish Department, Phoenix, AZ. 8 pages.
- . 2021. Species Lists. Special-Status Species by Taxonomic Group, Scientific Name. Heritage Data Management System. Updated July 1, 2021. Available online at: <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/specieslists/>. Accessed February 2022.
- . 2022a. Arizona's Online Environmental Review Tool. Available online at: <https://ert.azgfd.gov/>. Accessed February 2022.
- . 2022b. Heritage Data Management System. Available online at: <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/specieslists/>. Accessed March 2022.

- City of Coolidge. 2014. Coolidge 2025 General Plan: The Future Today. Available online at: https://www.coolidgeaz.com/vertical/sites/%7BAE188E70-DD7F-47BE-99EF-B58B70641DF9%7D/uploads/Chapter_1-Introduction.pdf. Accessed February 2022.
- eBird. 2022. eBird sightings in Arizona. Available online at: <https://eBird.org/region/US-AZ-003>. Site accessed March 2022.
- FEMA (Federal Emergency Management Agency). 2022. National Flood Hazard Layer, Washington State. FEMA. Available online at: <https://msc.fema.gov>. Accessed February 2022.
- Google Earth. 2022. Map showing location of the Project. U.S. Department of State Geographer Image Landsat. Available online at: <https://www.google.com/earth/>. Accessed February 2022.
- iMapInvasives. 2022. iMapInvasives database. Available online at: <https://www.imapinvasives.org/>. Accessed February 2022.
- Maricopa Association of Governments. 2019. Socioeconomic Projections. Available online at: <https://geo.azmag.gov/maps/projections/>. Accessed February 2022.
- . 2022a. Land Use and Real Estate. Available online at: <https://azmag.gov/Programs/Maps-and-Data/Land-Use-and-Real-Estate>. Accessed March 2022.
- . 2022b. Transportation Data Management System. Available online at: https://mag.ms2soft.com/TDMS.UI_Core/portal. Accessed February 2022.
- Olin, Andy. 2020. *It's Hard to Breathe With a Concrete Plant in Your Backyard*. The Kinder Institute for Urban Research. Available online at: <https://kinder.rice.edu/urbanedge/2020/08/19/houston-air-pollution-breathe-concrete-plants-TCEQ>. Accessed February 2022.
- Pinal County. [no date.]. Pinal County Subdivision and Infrastructure Design Manual. Available online at: <https://www.pinalcountyyaz.gov/PublicWorks/Documents/FinalSubInfra.pdf>. Accessed February 2022.
- . 2007. Pinal County Open Space and Trails Master Plan. Available online at: <https://www.pinalcountyyaz.gov/openspacetrails/documents/final%20open%20space%20and%20trails%20master%20plan.pdf>. Accessed February 2022.
- . 2008. Regionally Significant Routes for Safety and Mobility, Final Report. Available online at: <https://www.pinalcountyyaz.gov/PublicWorks/TransportationPlanning/Documents/RSRSMFinalReport.pdf>. Accessed February 2022.
- . 2012. Open Space and Recreation Area Guideline Manual. Available online at: <https://www.pinalcountyyaz.gov/CommunityDevelopment/Planning/Documents/Open%20Space%20and%20Recreation%20Area%20Design%20Guidelines%20Manual.pdf>. Accessed May 2022.
- . 2017. Pinal County Access Management Manual. Available online at: https://www.pinalcountyyaz.gov/PublicWorks/TransportationPlanning/Documents/RSRSM%202017%20Update/Final%20Access%20Management%20Manual_sealed.pdf. Accessed February 2022.

- . 2019. We Create Our Future: Pinal County Comprehensive Plan. Available online at: <https://www.pinalcountyz.gov/CommunityDevelopment/Planning/Documents/CompPlan/Comprehensive%20Plan%202020.pdf>. Accessed February 2022.
- . 2022a. Assessor Parcel Viewer. Available online at: <https://www.pinalcountyz.gov/informationtechnology/pages/gis.aspx>. Accessed February 2022.
- . 2022b. Pinal County Drainage Manual and Pinal County Drainage Ordinance. Available online at: <https://www.pinalcountyz.gov/communitydevelopment/engineering/pages/documents.aspx>. Accessed February 2022.
- . 2022c. Development Services Code and Floodplain Management. Available online at: https://library.municode.com/az/pinal_county/codes/development_services_code_and_floodplain_management_. Accessed May 2022.
- Sauer, J.R., D.K. Niven, J.E. Hines, D.J. Ziolkowski, Jr, K.L. Pardieck, J.E. Fallon, and W.A. Link. 2017. The North American Breeding Bird Survey, Results and Analysis 1966 – 2015. Version 2.07.2017 USGS Patuxent Wildlife Research Center, Laurel, M.D.
- SHPO (Arizona State Historic Preservation Office). [no date.] Government to Government Consultation Toolkit. Developed in coordination with the Salt River Pima-Maricopa Indian Community. Available online at: <https://sites.google.com/view/az-consultation-toolkit/home>. Accessed February 2022.
- Sullivan, B.L., C.L. Wood, M.J. Iliff, R.E. Bonney, D. Fink, and S. Kelling. 2009. eBird: a citizen-based bird observation network in the biological sciences. *Biological Conservation* 142: 2282-2292.
- Town of Florence. 2020. Town of Florence 2020 General Plan. Available online at: <http://www.florenceaz.gov/wp-content/uploads/documents/Community%20Development/2020%20General%20Plan/Florence%202020%20General%20Plan.pdf>. Accessed February 2022.
- USFWS (U.S. Fish and Wildlife Service). 2022a. IPaC Information for Planning and Consultation. Available online at: <https://ecos.fws.gov/ipac/>. Accessed February 2022.
- . 2022b. National Wetlands Inventory database maintained by the U.S. Fish and Wildlife Service. Available online at: <https://www.fws.gov/wetlands/>. Accessed February 2022.
- USGS (U.S. Geological Survey). 2022. The National Map, Interactive Map Viewer and Downloader. National Hydrography Dataset (NHD). Available online at: <https://viewer.nationalmap.gov/advanced-viewer/>. Accessed February 2022.

APPENDIX A: ALTA SURVEY

PREPARED FOR:



REVISIONS

#	DATE	COMMENT
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ALTA/NSPS Land Title Survey
GENERAL DRAWINGS

<u>DWG NO.</u>	<u>TITLE</u>
SHEET 02	INDEX SHEET - SURVEYORS NOTES
SHEET 03	TITLE INFORMATION SHEETS
SHEET 04-05	SECTIONAL DETAIL SHEETS



Pinal County, AZ

Cover Sheet

ALTA/NSPS
LAND TITLE SURVEY

DATE: 04/27/2022

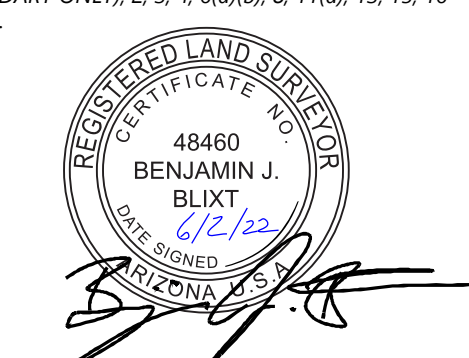
SHEET: 01 of 05

CERTIFICATION

TO FIRST AMERICAN TITLE INSURANCE COMPANY, AND AURORA SOLAR, LLC

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 1 (EXTERIOR PROJECT BOUNDARY ONLY), 2, 3, 4, 6(a)(b), 8, 11(a), 13, 15, 16 AND 17 OF TABLE A THEREOF. THE FIELD WORK WAS COMPLETED ON 04/14/2022.

BENJAMIN J. BLIXT, RLS DATE 4/27/2023
AZ LICENSE NO. 48460, EXPIRATION 09/30/2023
BEN.BLIXT@WESTWOODPS.COM



GENERAL SURVEYORS NOTES:

- 1) This survey was prepared using the Title Commitment provided by First American Title Insurance Company, File Number NCS-1120765-OR1, dated March 16, 2022 at 8:00 AM.
- 2) Bearings, distances and acreage's are based on the Arizona State Plane Coordinate System, Central Zone, International Feet, 2011 Adj. NAVD88.
- 3) As to Item 2, Table A: no addresses of the surveyed properties were obtained by the Surveyor, or observed while conducting the field work.
- 4) As to Item 3, Table A: According to data obtained from FEMA GIS Data website, the project lies within Map Number 04021C0850E and 04021C0875E, all with an effective date of 12/4/2007. The project area contains the following flood zones:
-Zone A: Special Flood Hazard Area subject to inundation by the 1% annual chance flood (no Base Flood Elevations determined)
-Zone AE: Special Flood Hazard Area subject to inundation by the 1% annual chance flood (Base Flood Elevations determined)
-Zone X: Areas determined to be outside the 0.2% annual chance floodplain

The flood maps referenced above don't appear to properly display the flood zones. The Surveyor is relying upon the available shapefile data from FEMA's NFHL Viewer to show the flood zones.

5) As to Item 4, Table A: Project area = XXXX Acres - TBD upon the final boundary.

6) As to Item 6(a)(b), Table A: Current zoning classification has not been provided by the client or insurer.

7) As to Items 8 and 15, Table A: Improvements appearing on this survey are a combination of information obtained by aerial photography, provided by the Client, flown on 10/23/2021 (with a map scale of 1"=25' and pixel size of 0.25 ft) and improvements located by conventional methods by Westwood Professional Services, Inc. All fences shown are per planimetric mapping provided by the Client.

8) As to Item 11(a), Table A: The underground utilities shown have been located from field survey information and existing drawings. The surveyor makes no guarantees that the underground utilities shown comprise all such utilities in the area, either in service or abandoned. The surveyor further does not warrant that the underground utilities shown are in the exact location indicated, although he does certify that they are located as accurately as possible from information available. The surveyor has not physically located the underground utilities.

The following utility companies were listed to be in the project area per the Arizona One Call system:

- AZ Public Service Main (submitted a design ticket on 4/22/2022, have not yet received a response)
- American Telephone (received mapping of their fiber optic lines, as shown on the survey)
- AZ DOT (clear of site)
- Electric District 2 (submitted a design ticket on 4/22/2022, have not yet received a response)
- Epcor Water, Inc. (clear of site)
- El Paso Natural Gas (submitted a design ticket on 4/22/2022, have not yet received a response)
- Hohokam Irrigation (submitted a design ticket on 4/22/2022, have not yet received a response)
- Kinder Morgan Energy (received mapping of their gas lines, as shown on the survey)
- Lumen (submitted a design ticket on 4/22/2022, have not yet received a response)
- MCI (submitted a design ticket on 4/22/2022, have not yet received a response)
- Centurylink (submitted a design ticket on 4/22/2022, have not yet received a response)
- San Carlos Irrigation (received mapping of their facilities, as shown on the survey)
- Sprint (received mapping of their facilities, as shown on the survey)
- Southwest Gas (unable to determine the gas line location from the mapping provided. It appears to run along N. Attaway Road)
- Cox Communications (from mapping provided, it appears that they own the overhead power lines on the north and east side of the project area, as shown)
- Zayo Group, LLC (clear of site)

GENERAL SURVEYORS NOTES:

9) As to Item 13, Table A: Adjoining owners will be shown upon completion of the final boundary.

10) As to Item 1, Table A: This ALTA/NSPS Land Title Survey was prepared to depict the Solar boundary and related encumbrances for the purpose of erecting a solar project. The Surveyor has perpetuated the lease boundaries based upon finding and establishing controlling section corner monumentation, however a search for monumentation has not been performed for each Parcel. All controlling section corners for the establishment of the lease boundaries have been, or will be properly recorded, according to Local and State Statutes. Furthermore, the Surveyor was not able to recover the section corners in N. Attaway Road due to heavy traffic volume. Traffic flaggers will likely be needed to get those corners established at a later date.

11) As to Item 16, Table A: There was no observed evidence of recent earth moving work, building construction or building additions, as of the date of the field work.

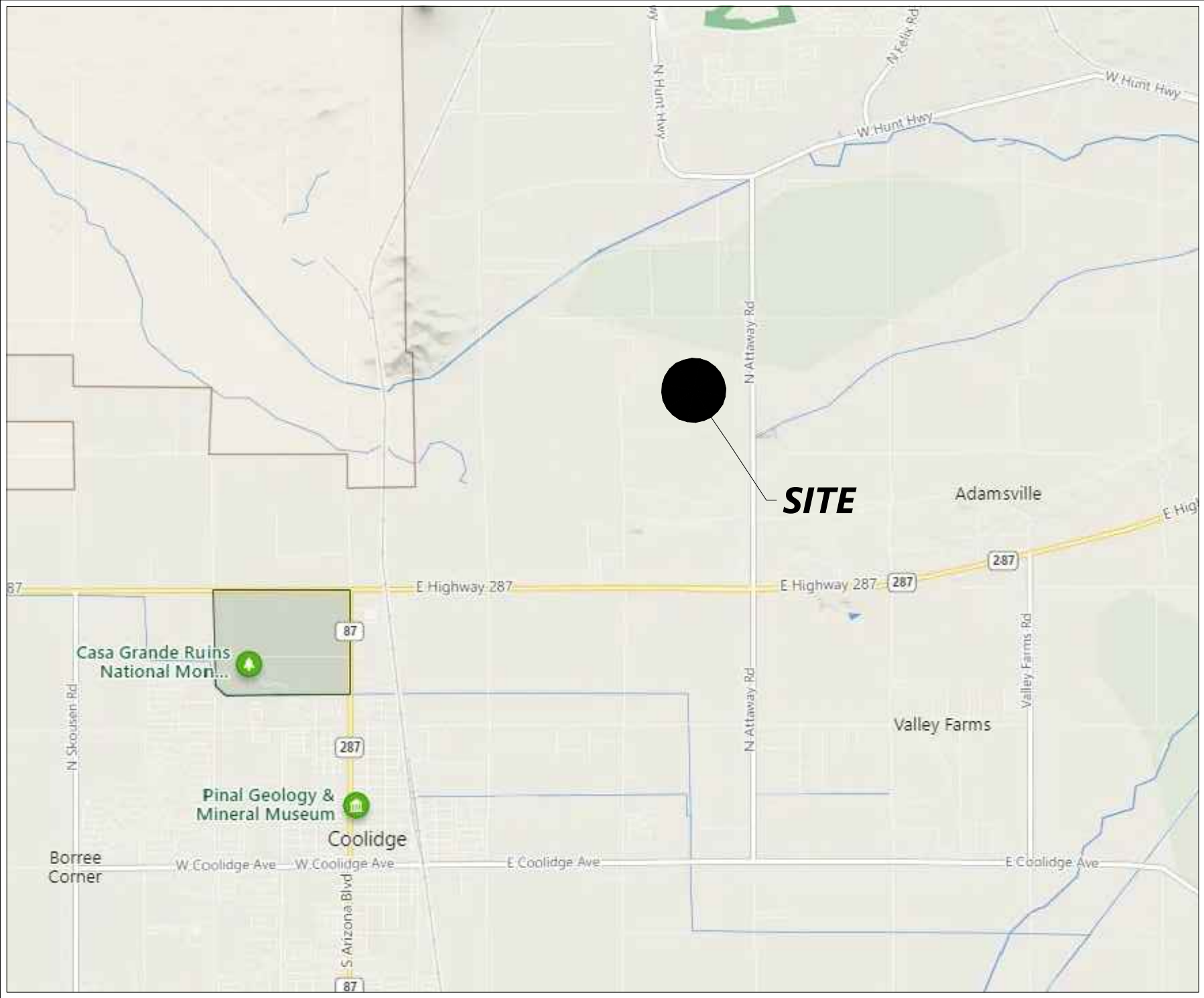
12) As to Item 16, Table A: The road right of ways shown are approximate, based on observed evidence. The Surveyor has left a message with Pinal County regarding the road right of way locations and has not heard anything back yet. Based on the Surveyor's research, and a recorded survey in Section 2, there appears to be recorded road easement documents in the County. The Surveyor advises the client to ask the title company to research the road easement records.

13) ALTA Survey will be revised and boundary corners will be set upon Pinal County approval for road excavation for section corners.

14) Parcels 3 and 4 have been removed at clients request via email received on May 25, 2022. An updated title report has not been provided.

VICINITY MAP

(NOT TO SCALE)



Westwood

Phone (480) 747-6558 6009 East Greenway Parkway, Suite 250
Fax (480) 361-8025 Scottsdale, AZ 85254
westwoodsps.com

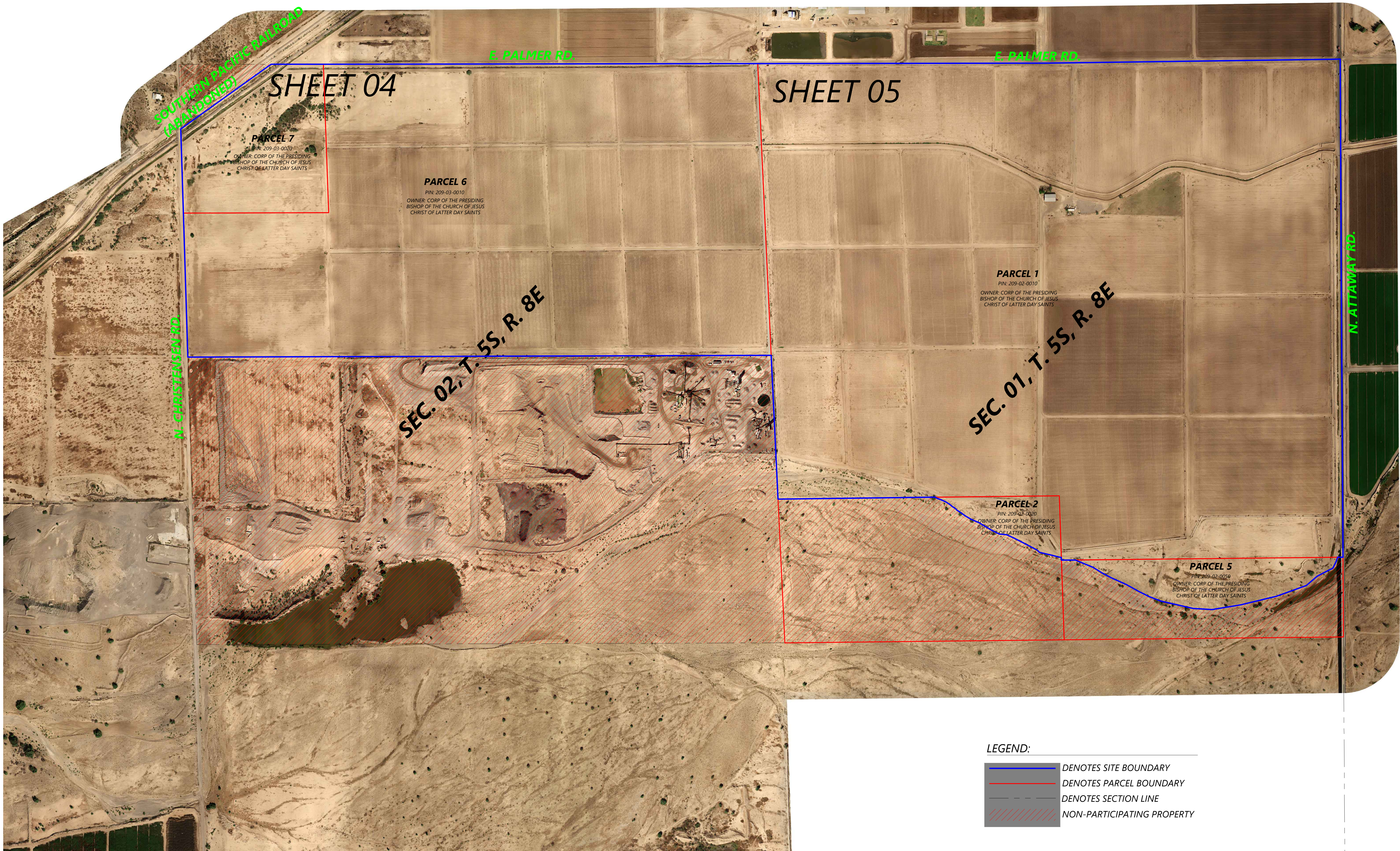
Westwood Professional Services, Inc.

PREPARED FOR:



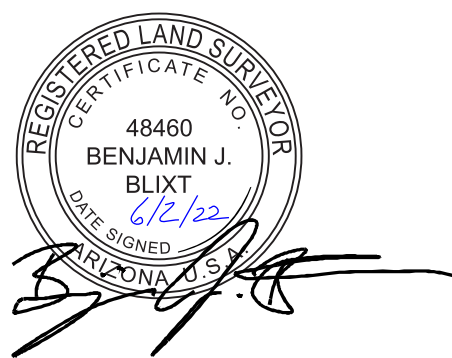
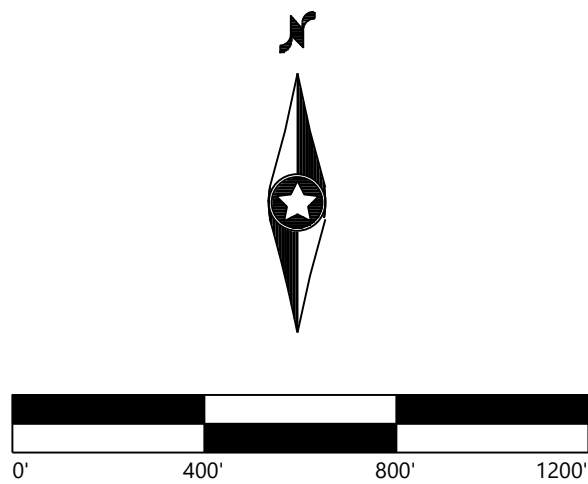
REVISIONS:

#	DATE	COMMENT



LEGEND:

- DENOTES SITE BOUNDARY
- DENOTES PARCEL BOUNDARY
- DENOTES SECTION LINE
- NON-PARTICIPATING PROPERTY



Cameron Solar Project

Pinal County, AZ

Index Sheet

ALTA/NSPS
LAND TITLE SURVEY

DATE: 04/27/2022

SHEET: 02 of 05

FILE NO. NCS-1120765-081 (SHEETS 04, 05)

Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-Day Saints, a Utah corporation Sole

The Land referred to herein below is situated in the County of Pinal, State of Arizona, and is described as follows:

PARCEL NO. 1: (APN: 209-02-0010)

ALL OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST, OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA.

EXCEPT THE SOUTH HALF OF THE SOUTHWEST QUARTER AND EXCEPT THE SOUTH 722 FEET OF THE SOUTHEAST QUARTER OF SAID SECTION 1.

AND EXCEPT AN UNDIVIDED 1/2 IN 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL NO. 2: (APN: 209-02-0020)

THE SOUTH HALF OF THE SOUTHWEST QUARTER OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, LYING NORTH OF THE NORTH BANK OF THE GILA RIVER.

EXCEPT AN UNDIVIDED 1/2 IN 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL NO. 3: (APN: 209-02-0030)

THE SOUTH HALF OF THE SOUTHWEST QUARTER OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, LYING SOUTH OF THE NORTH BANK OF THE GILA RIVER.

EXCEPT AN UNDIVIDED 1/2 IN 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL REMOVED AT CLIENT'S REQUEST BY EMAIL RECEIVED MAY 25, 2022. AN UPDATED TITLE REPORT HAS NOT BEEN PROVIDED

PARCEL NO. 4: (APN: 209-02-0040)

THE SOUTH 722 FEET OF THE SOUTHEAST QUARTER OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, LYING SOUTH OF THE NORTH BANK OF THE GILA RIVER.

EXCEPT AN UNDIVIDED 1/2 IN 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL REMOVED AT CLIENT'S REQUEST BY EMAIL RECEIVED MAY 25, 2022. AN UPDATED TITLE REPORT HAS NOT BEEN PROVIDED

PARCEL NO. 5: (APN: 209-02-0050)

THE SOUTH 722 FEET OF THE SOUTHEAST QUARTER OF SECTION 1, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, LYING NORTH OF THE NORTH BANK OF THE GILA RIVER.

EXCEPT AN UNDIVIDED 1/2 IN 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL NO. 6: (APN: 209-03-0010)

THE NORTH HALF OF SECTION 2, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA.

EXCEPT LOT 4 OF SAID SECTION 2.

AND EXCEPT AN UNDIVIDED 1/2 OF 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

PARCEL NO. 7: (APN: 209-03-0020)

LOT 4 OF SECTION 2, TOWNSHIP 5 SOUTH, RANGE 8 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, LYING SOUTH OF THE SOUTHERLY RAILROAD RIGHT OF WAY.

EXCEPT AN UNDIVIDED 1/2 OF 1/2 INTEREST OF ALL OIL RIGHTS AND MINERAL RIGHTS AS SET FORTH IN WARRANTY DEEDS, RECORDED AS DOCKET 1295, PAGE 773 AND AS DOCKET 1295, PAGE 777

EXCEPTIONS:

5. Reservations or Exceptions in Patents, or in Acts authorizing the issuance thereof, as set forth in Patents recorded in Book 14 of Deeds, Page 508-509 (Parcel 1) in Book 14 of Deeds, Page 509-510 (Parcel 1 and 2) in Book 14 of Deeds, Page 510-511 (Parcel 1) in Book 14 of Deeds, Page 512-513 (Parcel 6 and 7) in Book 28 of Deeds, Page 75 (Parcel 1, 4 and 5). (BLANKET IN NATURE OVER SUBJECT AREAS)

6. The right to enter upon said land, prospect for, mine and remove all oil and minerals as reserved in Warranty Deeds, recorded in Docket 1295, Page 773 and is Docket 1295, Page 777. (BLANKET IN NATURE OVER SUBJECT AREAS)

(Affects all Parcels)

7. Right of Way for the Pierson ditch as set forth in Warranty Deed recorded in Book 28 of Deeds, Page 65-68. (BLANKET IN NATURE OVER SUBJECT AREAS)

(Affects Parcel No. 1, 4 and 5)

8. Right of Way for the Spinas ditch and the Pierson ditch as set forth in Warranty Deed recorded in Book 33 of Deeds, Page 97. (BLANKET IN NATURE, INCLUDING THE RIGHT OF WAY OF THE SPINAS AND PIERSON DITCHES)

(Affects Parcel No. 1, 2, 3, 6 and 7)

9. Irrigation rights as dedicated in Warranty Deeds, recorded in Book 47 of Deeds, Page 311, in Book 47 of Deeds, Page 338, in Book 47 of Deeds, Page 339 and in Book 47 of Deeds, Page 340. (BLANKET IN NATURE, LOCATION OF DESCRIBED PUMPS UNKNOWN, RIGHTS TO IRRIGATION FOREVER DEDICATED TO SECTION ONE AND NORTH HALF OF SECTION TWO. LEGAL REVIEW ADVISED)

(Affects all Parcels)

10. An easement for Roadway and incidental purposes in the document recorded in Book 47 of Deeds, Page 324 of Official Records. (NOT PLOTTABLE, LOCATION OF ROADWAY ALONG SPINAS DITCH UNKNOWN)

(Affects all Parcels)

11. An easement for Pipeline and incidental purposes in the document recorded in Book 55 of Deeds, Page 336 of Official Records. (NOT PLOTTABLE, LOCATION OF EASEMENT NOT MATHEMATICALLY DESCRIBED)

(Affects Parcel No. 1 and 2)

12. An easement for Meter Station and/or Pipeline and incidental purposes in the document recorded in Book 80 of Deeds, Page 247-248 of Official Records. (NOT PLOTTABLE, LOCATION OF EASEMENT NOT MATHEMATICALLY DESCRIBED)

(Affects Parcel No. 1, 4 and 5)

13. An easement for Pipeline and incidental purposes in the document recorded as Docket 143, Page 432 of Official Records. (WEST 30' OF THE NW1/4 SECTION 2, AS SHOWN)

(Affects Parcel No. 6 and 7)

14. An easement for Public Highway and incidental purposes in the document recorded as Docket 154, Page 467 of Official Records. (AS SHOWN)

(Affects Parcel No. 1, 4 and 5)

15. An easement for Telephone and Telegraph and incidental purposes in the document recorded as Docket 195, Page 8 of Official Records. (BLANKET IN NATURE OVER THE NE/4 NE/4 SEC 1)

(Affects Parcel No. 1)

16. Declaration of Road by the Board of Supervisors of Pinal County recorded as Docket 375, Page 572. (BLANKET IN NATURE, COVERS SUBJECT PROPERTY)

(Affects all Parcels)

17. An easement for transmission of power and incidental purposes in the document recorded as Docket 740, Page 336 of Official Records. (BLANKET EASEMENT OVER SECTION 1)

(Affects Parcels 1-5-Blanket Easement)

18. An easement for electrical transmission line and incidental purposes in the document recorded as Docket 1399, Page 786 of Official Records. (BLANKET EASEMENT OVER SECTION 1)

(Affects Parcels 1-5-Blanket Easement)

19. An easement for public highway, public utilities, canal or ditches and incidental purposes in the document recorded as Docket 1520, Page 322 of Official Records. (AS SHOWN)

(Affects Parcel No. 1, 4 and 5)

20. An easement for underground natural gas supply pipeline and incidental purposes in the document recorded as 2003-062752, re-recorded as 2003-077022 of Official Records. (AS SHOWN)

Real property Assignment and Assumption Agreement recorded as 2006-107262; re-recorded as 2015-074894

(Affects Parcel No. 6 and 7)

21. All matters as set forth in Affidavit Claiming Zoning Exemption, recorded July 27, 2005 as 2005-093103 of Official Records. (NOT SHOWN, SPECIFIC LOCATION OF THE SUBJECT PROPERTY IS NOT DESCRIBED. THE SURVEYOR DOES NOT KNOW WHERE THE CURRENT ACCESS ROAD IS LOCATED FROM THE DESCRIPTION.)

22. Memorandum of Solar Option and Lease Agreement, dated April 27, 2021, recorded as 2021-090229 by and between The Church of Jesus Christ of Latter-Day Saints, a Utah corporation sole, Owner and Aurora Solar, L.L.C., a Oregon limited liability company, Operator, for a term of 4 years. (NOT SHOWN, LEASE AGREEMENT COVERS ALL SUBJECT PARCELS)

Defects, liens, encumbrances or other matters affecting the leasehold estate, whether or not shown by the public records are not shown herein.

(Affects all Property)

23. Any facts, rights, interests or claims which would be disclosed by a correct ALTA/NSPS survey.

24. Rights of parties in possession.

25. Any lien, or right to a lien, imposed by law, as a result of services, labor, and/or materials used, or to be used, for improvement to the premises.

26. Water rights, claims or title to water, whether or not shown by the Public Records.

27. Any claim to (a) ownership of or rights to minerals and similar substances, including but not limited to ores, metals, coal, lignite, oil, gas, uranium, clay, rock, sand, and gravel located in, on, or under the Land or produced from the Land, whether such ownership or rights arise by lease, grant, exception, conveyance, reservation, or otherwise; and (b) any rights, privileges, immunities, rights of way, and easements associated therewith or appurtenant thereto, whether or not the interests or rights excepted in (a) or (b) appear in the Public Records or are shown in Schedule 8.

28. Defects, liens, encumbrances, adverse claims or other matters, if any, created, first appearing in the Public Records, or attaching subsequent to the effective date hereof but prior to the date the proposed insured acquires for value of record the estate or interest or mortgage thereon covered by this Report/Commitment.

Westwood

Phone (480) 747-6558 6009 East Greenway Parkway, Suite 250
Fax (480) 361-8025 Scottsdale, AZ 85254
westwoodps.com

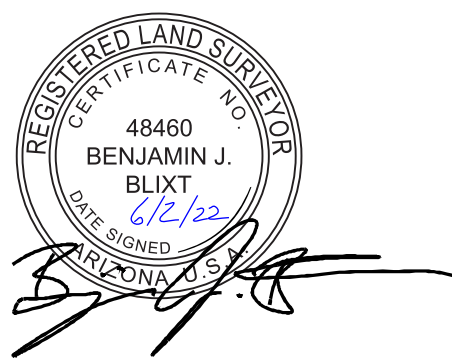
Westwood Professional Services, Inc.

PREPARED FOR:



REVISIONS:

#	DATE	COMMENT



Cameron Solar Project

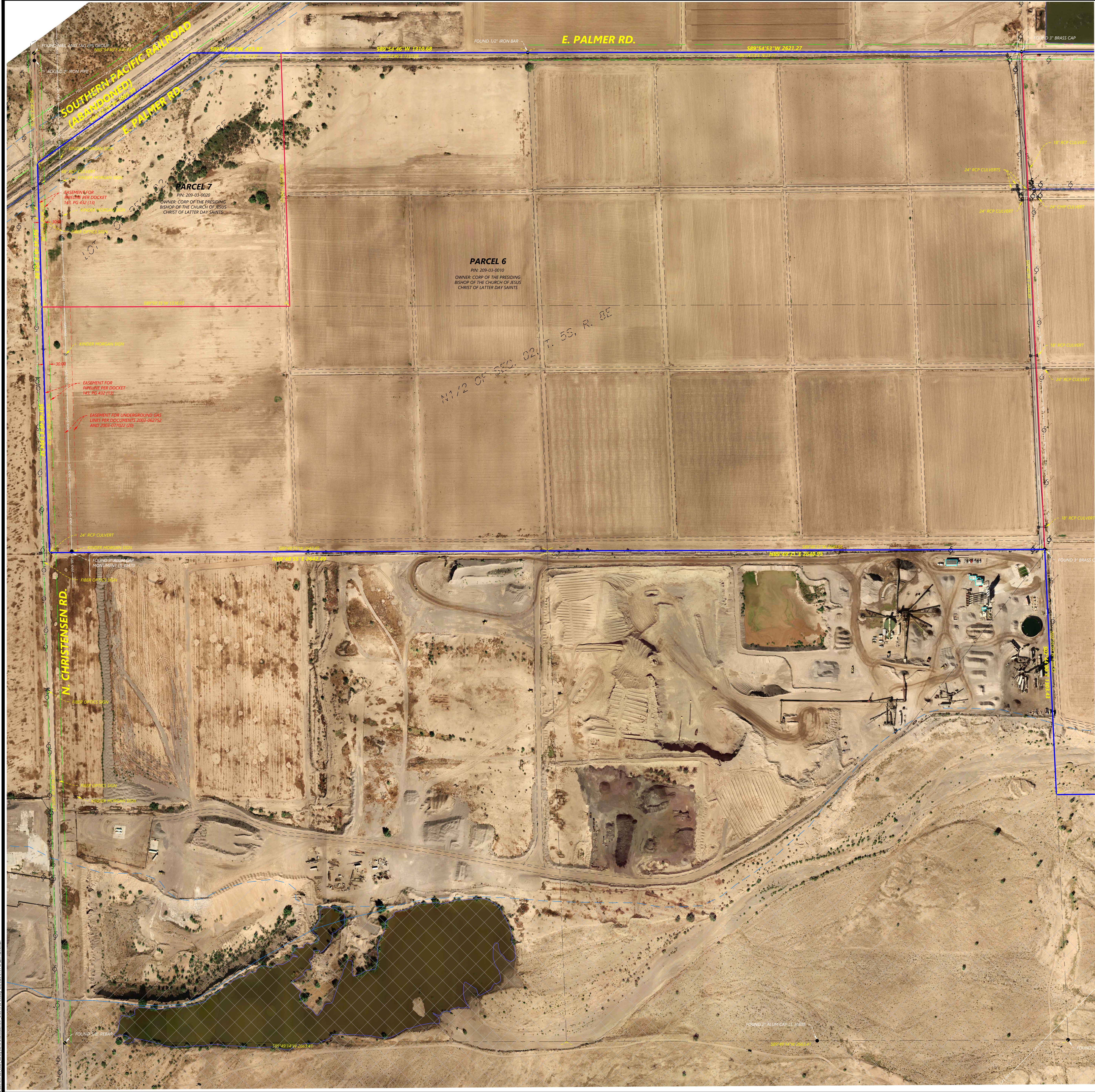
Pinal County, AZ

Notes Sheet

ALTA/NSPS LAND TITLE SURVEY

DATE: 04/27/2022

SHEET: 03 of 05



SEE SHEET 03 FOR TITLE NOTES

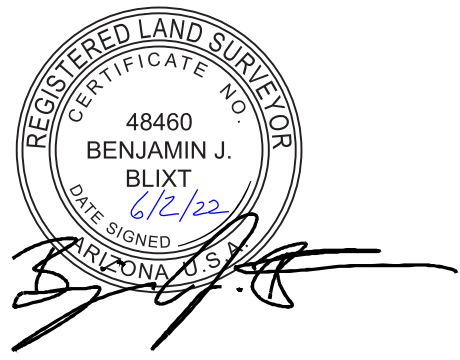
PREPARED FOR:



REVISIONS:		
#	DATE	COMMENT

LEGEND:

- FOUND MONUMENT (SEE LABEL)
- SET MONUMENT (SEE LABEL)
- WATER WELL
- UNKNOWN MANHOLE
- TELEPHONE BOX
- FIBER OPTIC PEDESTAL
- CULVERT
- SIGN
- POWER POLE
- ▨ FEMA ZONE AE FLOODWAY
- ▨ FEMA ZONE AE
- ▨ FEMA ZONE A
- FO — FIBER OPTICS LINE
- POH — POWER OVERHEAD LINE
- GAS — UNDERGROUND GAS LINE
- RIGHT OF WAY LINE
- BOUNDARY LINE
- PARCEL LINE
- EASEMENT LINE
- SECTION LINE
- BUILDING
- PAVED ROADWAY
- UNPAVED TRAIL
- X — FENCE LINE
- EDGE OF WATERBODY



Cameron Solar Project

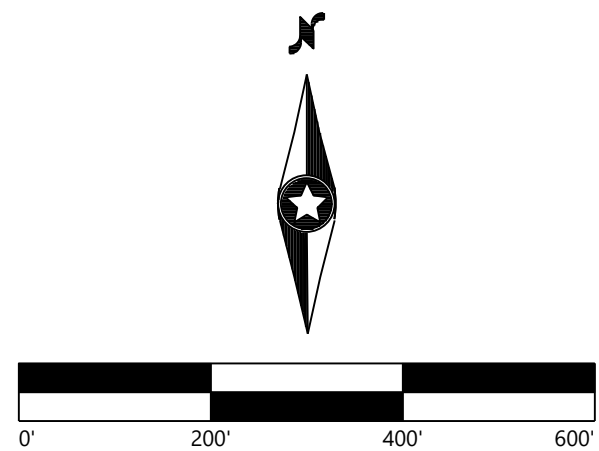
Pinal County, AZ

Detail Sheet

ALTA/NSPS
LAND TITLE SURVEY

DATE: 04/27/2022

SHEET: 04 of 05





SEE SHEET 03 FOR TITLE NOTES

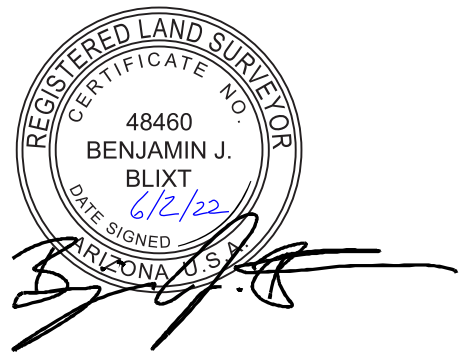
PREPARED FOR:



REVISIONS:		
#	DATE	COMMENT

LEGEND:

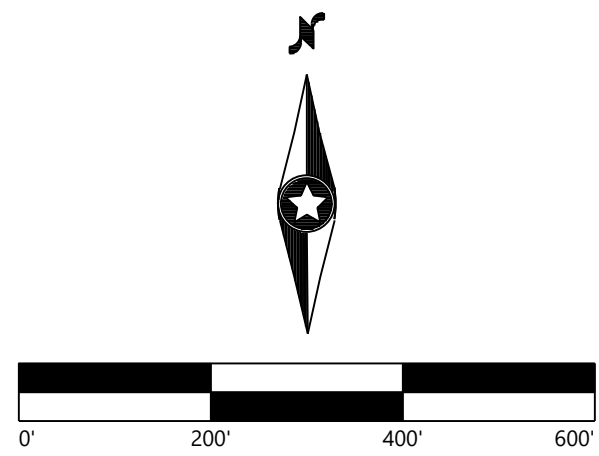
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- ⊞ FIBER OPTIC PEDESTAL
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Cameron Solar Project

Pinal County, AZ

Detail Sheet



ALTA/NSPS
LAND TITLE SURVEY

DATE: 04/27/2022

SHEET: 05 of 05