Application
for a
Special Use Permit

WEST CAMP WIND FARM

Prepared for:
Navajo County
Planning and Zoning Department

Submitted by:
West Camp Wind Farm, LLC

SUP 22-007

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CONTENTS

NARRATIVE
TABLE OF CONTENTS

EXHIBITS

FIGURES

Introduction

West Camp Wind Farm, LLC (Applicant), is requesting a Special Use Permit (SUP) from Navajo County to allow the construction and operation of the West Camp Wind Farm, a proposed maximum 500-megawatt (MW) wind energy and battery storage facility (Wind Farm Site). The planned Wind Farm Site is located approximately 10 miles south of Joseph City in Navajo County as depicted in Figure 1 at the end of this narrative. The Wind Farm will include a generation-tie transmission line (Gen-Tie Line) to interconnect the Wind Farm with the regional transmission grid (Figure 2). The Wind Farm, battery storage facility, and Gen-Tie Line will henceforth be referred to collectively as the "Project."

The Project will be built almost entirely on private land. Some Arizona State Trust land will be used for the Wind Farm access roads, collection lines, and potentially turbines. The Gen-Tie Line will be located entirely on private land. As depicted on the figures and site plan included with this application, the term "Wind Farm Site" refers to the approximately 52,500-acre area where the Wind Farm, battery storage, and ancillary high-voltage infrastructure will be located. The term "Gen-Tie Line Corridor to Cholla Substation" refers to the transmission line corridor extending north of the Wind Farm to the Cholla Substation (see Figure 1).

Description of the Applicant

West Camp Wind Farm, LLC, is an indirect subsidiary of The AES Corporation (AES). AES is a Fortune 500 company that generates and distributes electrical power worldwide. Headquartered in Arlington, Virginia, The AES Corporation holds assets totaling over $35 billion. It is one of the world's leading power companies, generating and distributing electric power in 15 countries and employing 10,500 people.

Based in Salt Lake City, Utah, and Louisville, Colorado, AES's clean energy division designs, builds, owns, and operates solar, wind, and energy storage projects in the United States. Generation capacity of the systems owned and/or operated under AES totals over three (3) gigawatts (GW) across the United States, with another one (1) + GW under construction. In addition, AES Clean Energy has a contracted renewable energy backlog that includes over three (3) GW.

Description of the Project

The Wind Farm will be composed of up to 104 wind turbines, with each turbine reaching a total system tip height of up to 820 feet. Associated facilities include electrical collection lines, up to two (2) on-site substations, a potential on-site switching station, battery storage facilities, an operations and maintenance (O&M) building, laydown yard, parking area, permanent meteorological towers, an aircraft detection lighting system, and access roads. Three (3) County-permitted temporary meteorological towers already exist in the Permit Area, with two (2) additional County-approved temporary towers to be installed in the summer of 2022. The temporary meteorological towers would be removed immediately prior to or during construction of the Wind Farm. Up to six permanent meteorological towers will be installed for the duration of the Project life. A Gen-Tie Line will interconnect the Wind Farm to the existing Arizona Public Service (APS) transmission system at the Cholla Substation or via a line tap to either the APS 345-kV Preacher Canyon-Cholla transmission line or the APS 345-kV Cholla-Pinnacle Peak transmission line within the Wind Farm Site (Figure 2). The conceptual Gen-Tie Line interconnection options are described below.

- Gen-Tie Line Option A – Up to (2) two on-site substations located within the Wind Farm Site and an approximately 25-mile-long 345-kV or 500-kV transmission line to the existing Cholla

Substation. Exterior to the Wind Farm Site, the Gen-Tie Line Corridor to the Cholla Substation largely parallels existing high-voltage transmission line infrastructure to the existing Cholla Substation.

- Gen-Tie Line Option B – Single on-site substation located within the Wind Farm Site and an approximately 17-mile-long 345-kV or 500-kV transmission line to the existing Cholla Substation. Exterior to the Wind Farm Site, the proposed Gen-Tie Line Corridor to the Cholla Substation largely parallels existing high-voltage transmission line infrastructure to the existing Cholla Substation.
- Gen-Tie Line Option C – Up to two (2) on-site substations within the Wind Farm Site, up to an approximately 11-mile-long 345-kV Gen-Tie to either the existing APS 345-kV Preacher Canyon-Cholla transmission line or the existing APS 345-kV Cholla-Pinnacle Peak transmission line, and single on-site switching station and line-tap within the Wind Farm Site.

The proposed Project is described in more detail in Exhibit A and Project components are graphically depicted in the Site Plan submitted with this application. The Applicant is requesting flexibility to site the Project components depicted in the Site Plan. Wind Energy Corridors (as shown on the Site Plan) are shown to represent the approximate locations within which turbines will be sited during final design and engineering. The Wind Energy Corridors were designed to comply with the minimum required setbacks for wind turbines, which are further discussed below. Internal access roads and underground collection routes will be based on the final turbine layout. Preliminary siting locations are shown for the laydown area and O&M facility. The location of Gen-Tie Line and associated high-voltage infrastructure, including transmission lines, substations, and on-site switchyard and line-tap, within the Wind Farm Site will be based on further electrical interconnection and engineering requirements. The Applicant is currently seeking approval of the Gen-Tie Line and associated high-voltage infrastructure from the Arizona Corporation Commission via Certificate of Environmental Compatibility. Final design and engineering details of all Project structures will be provided to Navajo County in future Building Permit applications.

Location of the Project and Land Ownership

The application concerns real property in:

Township 15 North, Range 17 East–Range 19 East;

Township 16 North, Range 18 East–Range 19 East of the Gila and Salt River Baseline and Meridian.

The majority of land within the Wind Farm Site, 71 of 81 sections, is owned by the Aztec Land and Cattle Company, Ltd or Aztec East Jeffers, LLC. The remaining 10 sections are State Trust lands managed by the Arizona State Land Department (ASLD).

A legal description and assessor parcel numbers are provided with the Application Form. In coordination with Navajo County planning staff, the legal description is provided in Township, Range and Section format. A metes and bounds legal description can be provided to Navajo County prior to construction at the time of Building Permit application, if required.

Relationship to Surrounding Properties

Zoning

All private land in and adjacent to the Wind Farm Site is zoned A-General or Unspecified. Land traversed by and adjacent to the planned Gen-Tie Line Corridor to Cholla Substation is zoned A-General, Rural 20 (RU-20), Rural 1 (RU-1), or Unspecified, as shown in Figure 3. Under Section 402 of Article 4 in the *Navajo County Zoning Ordinance*, electric power generating plants and facilities, including wind projects, are permitted special uses within the A-General, RU-20, and RU-1 zoning districts.

Land Uses

Land uses in and around the Permit Area are predominately livestock grazing, related ranching activities, and dispersed recreation, including hunting. An exception to these predominant land uses is a rural subdivision (the Chevelon Canyon Subdivision), which borders the Wind Farm Site on the west. The subdivision is a 32,000-acre, off-grid planned ranch community composed of 855 privately owned lots, most of which are about 40 acres. The majority of the lots are vacant, but over a 100 include residences or other structures. The closest legally permitted residence in the subdivision is approximately 0.45 miles west of the Wind Farm Site and 1.1 miles west of the nearest Wind Energy Corridor.

South of the Wind Farm Site at Dry Lake, a 7,220-acre property owned by the Pink Cliffs Land Company, LLC is used for ash landfill and storage of wastewater generated by Novo BioPower, a biomass renewable energy facility located in Snowflake, Arizona.

Additional land uses in the Project vicinity include three (3) high voltage transmission lines that cross the northwest corner of the Wind Farm Site and run parallel to the proposed Gen-Tie Line Corridor the Cholla Substation. The three (3) high-voltage transmission lines are the:

- APS 345-kV Preacher Canyon-Cholla line;
- APS 345-kV Cholla-Pinnacle Peak line, which occupies the same corridor as the Preacher Canyon-Cholla line; and
- APS 500-kV Saguaro-Cholla line, which occupies a separate corridor, approximately 1,800 feet east of the 345-kV corridor.

Landowners

The landowners of all properties adjacent to the Wind Farm Site are listed in Exhibit B.

Proof of Legal Access to the Site

The Applicant has a lease agreement and transmission easement agreement with the private landowner and has submitted a Special Land Use Permit application with the ASLD for survey access to the State Trust lands within the wind farm. The Applicant has procured a consent letter from the Arizona State Land Department in connection with this SUP Application and plans to apply for a Right of Way from ASLD once engineering has progressed. Proof of legal access to the site is provided in Exhibit C.

Proposed Site Access

Primary access during construction from US Interstate 40 will be made from State Route 377, east of the Wind Farm Site (Figure 1). From State Route 377, entry into the Wind Farm Site will be via Hutch Road, an existing gravel road maintained by Navajo County. The Applicant will work with Navajo County,

ASLD, Bureau of Land Management, and private landowners to obtain the necessary approvals and consents for the use of Hutch Road prior to construction. Minimal to no improvements to Hutch Road are expected as part of the Project, and the Applicant will be responsible for any repairs and restoration caused by its use of Hutch Road. Existing ranch roads within the Wind Farm Site will be used to the maximum extent practicable. Alternative access is possible via Apache Avenue, McLaws Road, Territorial Road and West Camp Road. From these County-maintained roads, existing ranch roads on Aztec and ASLD parcels can be utilized to access the Wind Farm Site.

Schedule and Phasing

The Project is projected to achieve commercial operation in 2025, with construction of the Project potentially commencing in late 2023 or early 2024. The Project may be built in simultaneous or subsequent phases prior to reaching the full targeted 500 MW nameplate capacity.

Community Facilities and Services within Three Miles of the Project

No national, state, county, or municipal parks or important bird areas are located within three (3) miles of the Project. Two Schools (an elementary school and a Junior/Senior high school) are located in Joseph City approximately 10 miles north of the Wind Farm Site. Exhibit H provides a summary of known cultural resources in the Project vicinity, including resources listed on the National Park Service's Register of Historic Planes. Exhibit H Attachment C *Wetlands and Other Waters of the U.S. Review of the West Camp Wind Farm* also provides a summary of water resources. Riparian areas and earthen stock tanks are commonly identified as "wetlands" in the National Wetlands Inventory. There are multiple earthen stock tanks in the Wind Farm Site and vicinity, as well as wetlands that intermittently border the Little Colorado River and occur in a low-lying area called Obed Meadow along the Gen-Tie Line Corridor to the Cholla Substation. Additional wetlands occur 1 to 1.7 miles south of the Wind Farm Site at Dry Lake and Twin Lakes, which are artificially flooded as part of the Pink Cliffs ash landfill/wastewater storage operation.

Conformance to the Navajo County Comprehensive Plan

There are two Navajo County adopted planning documents applicable to the Permit Area, the 2011 Navajo County Comprehensive Plan[1] (Comprehensive Plan) and the 2011 Aztec Area Plan[2] (Aztec Area Plan). The Aztec Area Plan was incorporated into the Comprehensive Plan. The Aztec Area Plan was developed to guide the future development of a 228,040-acre private land property in Navajo County that is owned by the sponsors of the Aztec Area Plan: the Aztec Land and Cattle Company, Ltd.; the Aztec Land Company, LLC; and the Aztec Despain Ranch LLC.

Within the Wind Farm Site, the Comprehensive Plan applies to the Arizona State Trust land parcels. The Aztec Area Plan applies to the remainder of the privately owned Aztec parcels in the Wind Farm Site.

The following sections demonstrate the Project's conformance to the Comprehensive Plan and the Aztec Area Plan.

Comprehensive Plan

[1] Navajo County. 2011a. Navajo County Approved Comprehensive Plan.
[2] Navajo County. 2011b. Aztec Area Plan.

The Comprehensive Plan does not define specific land uses, but rather "character areas" that identify how each specific area may develop over time using general guidelines. Lands subject to the Comprehensive Plan in the Wind Farm Site are mapped as "Rural Ranch" and "Range Land" character areas, the purposes of which are to "preserve the open character of land traditionally used for ranching in Navajo County" and "allow cattle ranching, farming, and other traditional Navajo County agricultural uses," respectively[3] (Figure 3).

The planned Wind Farm, with its widely spaced turbines, minimal fencing and disturbance of rangelands, low human presence, and tolerance by grazing livestock and terrestrial wildlife, is compatible with preserving expansive, accessible ranchlands for traditional ranching, hunting, and other rural activities. Placing wind turbines on ranchland is an effective way to protect the open character of the landscape and wildlife habitat that might otherwise be fragmented with grid-like subdivisions or other developments that bring more density than the Wind Farm. The steady income provided by wind farm leases can allow ranchers to keep large tracts of land intact and continue ranching at their discretion despite volatile livestock market conditions.

Aztec Area Plan

The sponsor of the Aztec Area Plan and the landowner participating in the Project provided a supporting letter for the project (Exhibit I). The Aztec Area Plan uses similar character areas as the Comprehensive Plan; however, the definitions of the character areas differ from the Comprehensive Plan and there are additional character areas. The Aztec Area Plan's character areas are also intended to "provide a general framework for development within the Aztec Area Plan rather than establish a more precise guide that mirrors a zoning district map"[4].

In the Wind Farm Site, character area designations include "Community Village," "Rural Edge," "Rural Ranch," and "Powerline Corridor Overlay" (Figure 4). The Gen-Tie line components are consistent with the intent of this character area by collocating with existing transmission infrastructure. The "Rural Edge" and "Rural Ranch" character areas have a similar purpose for the preservation of open character of land for rural uses as the Comprehensive Plan, while also allowing for rural residential development and encouraging utilities and generation facilities.

The Aztec Area Plan established several "Community Village" areas, some of which are located near existing communities and highway corridors or intersections, while others are proposed in entirely new areas with the intent to be developed in a suburban form. Within the Wind Farm Site, there are no existing or proposed residential developments. The "Community Village" character area mapped within the Wind Farm Site is in an undeveloped area that lacks the existing infrastructure and development necessary to support residential development, including lack of paved access roads and public or private utilities. In Applicant discussions with the landowner, little interest has been expressed for residential development in the Wind Farm Site, and in fact, the majority of development interest has been associated with renewable energy development. When developing the Aztec Area Plan in 2011, wind energy development was contemplated in areas mapped as high wind resource potential, including areas to the east of the Wind Farm Site and around the Dry Lake I and II wind projects (see Appendix 2 of the Aztec Area Plan). Since 2011, technologies have advanced such that areas previously thought of as moderate to low wind resource potential are viable for development.

The proposed Wind Farm was designed to meet the minimum setbacks as required by the wind energy ordinance and is sited in a rural area away from existing residential development. While wind energy is generally not compatible with suburban residential development envisioned for "Community Village"

[3] Navajo County 2011a:20.
[4] Navajo County 2011b:19.

character areas; the proposed Wind Farm does support other stated purposes of the Aztec Area Plan, including those for economic and employment opportunities and continued preservation of ranching land uses. The lands mapped as "Community Village" in the Wind Farm Site are zoned A-General. In this zoning district, wind energy generation facilities are a permitted special use. An amendment to the Aztec Area Plan is not required when a development is consistent with the current zoning[5]. This application demonstrates the proposed Wind Farm's compliance with applicable zoning designation and wind energy ordinance requirements.

Public Participation

The Applicant prepared a Citizen Participation Plan and coordinated with Navajo County staff to ensure that potentially affected citizens in Navajo County have been informed about the planned Wind Farm and been given opportunities to provide comments on the planned Wind Farm. As stipulated in the Citizen Participation Plan, the Applicant mailed information about the proposed project to neighboring property owners and invited them to attend one (1) of two (2) public meetings. Mailers were sent to all properties located within one (1) mile of the Wind Farm Site in Navajo County, as required by Navajo County Ordinance No. 06-10. Two meetings were held in Holbrook, Arizona, on May 24, 2022, and followed an informal "open house" format. This allowed community members to attend at their convenience, review information about the planned Wind Farm via printed handout and poster board materials, interact with members of the project team, and provide comments. In addition to the mailing and public meeting, the Applicant is maintaining a project-dedicated website at https://www.aes.com/west-camp-wind/ that provides an ongoing venue for public comment. Public input received as of the application submittal, has been incorporated into the Citizen Participation Report, which is attached to this application as Exhibit D. The Applicant continues to respond to public inquiries and comments to the greatest extent practicable, in addition to updating the project website with relevant Wind Farm information. Other public noticing, including website updates, and additional mailings will occur in connection with the Arizona Corporation Commission proceedings for the Gen-Tie Line and associated high-voltage infrastructure, including transmission lines, substations, and switching station and line-tap.

Conformance to Navajo County Development Standards and Requirements

The Applicant will confer with Navajo County staff to ensure that the planned Wind Farm meets all applicable county standards and requirements. Because of the unique characteristics of wind energy facilities and public concerns about them, the development standards and requirements governing wind energy facilities in the county are codified in their own section of the *Navajo County Zoning Ordinance*—Section 2008. Conformance of the planned Wind Farm design to the Section 2008 turbine setback, noise, and lighting requirements is described below. The Applicant's signage plan is included as well. Conformance of the Wind Farm to other Section 2008 requirements is addressed as appropriate elsewhere in this application.

Setbacks

The Applicant will comply with the minimum wind tower setback requirements in Section 2008 of the Zoning Ordinance:

- 0.5 mile (2,640 feet) from existing residence that is located outside of the project boundary,

[5] Navajo County 2011b:60.

- For privately owned parcels greater than 2.5 acres, setback of 0.25 mile (1,320 feet) or 150% of the total tower height (whichever is greater) from the common property line with such parcels,
- For privately owned parcels smaller than 2.5 acres, setback of 0.5 mile (2,640 feet) or 150% of the total tower height (whichever is greater) from the common property line with such parcels,
- All other adjacent land, setback of 1.1 times (110%) the total tower height from the project boundary.
- 0.25 mile (1,320 feet) from public or publicly maintained roadway, or
- 1.5 times (150%) the total turbine height from railways, utility lines, interior phase lines or structure.

Prior to construction and building permit issuance, a final turbine layout demonstrating compliance with the minimum setback requirements will be provided to Navajo County.

Noise

Section 2008 of the Zoning Ordinance establishes standards for the levels of audible noise, low-frequency noise, and vibration generated by a wind energy facility that cannot be exceeded at the exterior of any legal residence, school, library, or hospital. No schools, libraries, or hospitals are located in the vicinity of the planned Wind Farm. The closest noise-sensitive receptor and legally permitted residence is approximately 0.45 mile west of the Wind Farm Site and 1.1 miles away from the nearest turbine corridor. To identify the noise levels likely to be generated by the planned Wind Farm, and specifically the noise levels anticipated at the exterior of the nearest noise-sensitive receptor, the Applicant retained SWCA Environmental Consultants (SWCA) to conduct a Noise Study of the Wind Farm in Navajo County (Exhibit E). The Applicant is considering multiple turbine models for the Project. For the purposes of this application, the Applicant used the loudest turbine model specifications to represent the maximum sound levels. The study concludes that the maximum sound levels from the planned Wind Farm will comply with all regulatory noise limits and guidelines established by Navajo County. Prior to construction, the Applicant will provide Navajo County with an updated sound study demonstrating the final turbine layout's compliance with all regulatory noise limits and guidelines established by Navajo County.

Visual Impact

Consistent with Section 2008(4)(f) of the Zoning Ordinance, turbines will be painted a non-reflective unobtrusive color to minimize visibility. A Visual Resource Assessment, including visual simulations, was completed for the project and is provided in Exhibit F.

Lighting

The planned Wind Farm is required to comply with the Federal Aviation Administration (FAA) Obstruction Marking and Lighting Advisory Circular (AC 70/7460-1L) rules and regulations related to lighting and marking of structures that exceed a certain height and have been determined to be a hazard to air navigation. Subject to FAA approval, the planned Wind Farm will be required to comply with a lighting plan to be issued by the FAA. Typically wind turbines are required to be lit with one or more red medium-intensity LED obstruction lights on the top of the wind turbine nacelle. The light is typically mounted on top of and at the rear of the nacelle of the wind turbine. To mitigate visual impacts, the Applicant plans to deploy an advanced radar-activated lighting system that only activates when low-flying aircraft are sensed in the Wind Farm Site. The use of the radar-activated lighting system will be subject to FAA review and approval. Wind turbines will also be equipped with a motion-activated

floodlight mounted just above the tower entrance door. As required by the *Navajo County Zoning Ordinance*, the floodlights will be shielded so that the direct illumination is confined to the property on which the use is located.

Signage Plan

All signs erected will conform to specifications in the *Navajo County Zoning Ordinance*.

Temporary Signage during Construction

- A main site entrance will be designated, and signage identifying the Project will be posted at the site entrance along with signs requiring appropriate personal protective equipment, site speed limits, and any other applicable safety or environmental requirements. Typically, the site entrance is occupied by security personnel.
- Temporary speed limit signs will be posted on access roads during construction.
- Emergency action plan signage consisting of site location and emergency phone numbers will be posted at identified muster points.

Permanent Signage during Operations

Substations

- Substation identification signs will be posted on all entrance gates to each substation.
- "Danger, High Voltage - Keep Out" signs will be posted on the perimeter fence at a minimum of 30- to 45-foot spacing. As stipulated in Section 2008, the signs will measure, at a minimum, 18 × 18 inches.
- Battery warning signs will be posted on the outside of each control house door warning of the presence of batteries and any other hazardous materials.
- Warning signs will be located next to all high- and low-side switch/circuit breaker handles warning not to operate while energized under load.

Wind Turbines

- Signage identifying the name/number of each wind turbine will be posted at the access road entrance to each turbine pad.

Environmental Due Diligence

Coordination with Wildlife Agencies

The Applicant met with representatives of the U.S. Fish and Wildlife Service (USFWS) and Arizona Game and Fish Department (AGFD) on May 18, 2022. The purpose of the meeting was to introduce the Project, characterize the Project's ecological setting, describe proposed wildlife surveys, and solicit input from the assembled agency personnel. The AGFD followed up the meeting with a letter recommending actions for the Applicant to address AGFD-suggested avoidance and minimization measures. That letter is included as Exhibit G. An agency-vetted Wildlife Survey Plan that will guide a suite of preconstruction wildlife studies is also included in Exhibit H (see the *Environmental Studies* section below).

Environmental Studies

In addition to the Noise Study and Visual Resource Assessment referenced above, several other environmental studies have been completed, are underway, or are planned. These studies, described in Exhibit H, include the following:

- Phase I Environmental Site Assessment
- Wildlife Site Characterization
- Eagle and Other Large Bird Use Surveys
- Small Bird Use Surveys
- Eagle Nest Surveys
- Non-eagle Species Nest Surveys
- Bat Acoustic Surveys
- Preliminary Jurisdictional Delineation for Waters of the U.S.
- Cultural Resources Surveys
- Native Plant and Noxious Weed Inventory

Conservation Planning

The Applicant will develop a bird and bat conservation strategy (BBCS) for the Project based on the site-specific data recorded for birds and bats and in accordance with the USFWS *Wind Energy Guidelines* (WEG). A BBCS is a wind energy project owner's record of the project-specific WEG Tiers 1–3 bird and bat assessments. It also documents project-specific best management practices (i.e., avoidance and minimization efforts) and plan for postconstruction fatality surveys, developed in coordination with cooperating wildlife agencies.

The Applicant will develop an Eagle Conservation Plan (ECP), or similar document, for the Project based on the site-specific data recorded for bald and golden eagle. An ECP is a wind energy project owner's record of the project-specific USFWS *Eagle Conservation Plan Guidance* (ECPG) Stage 1–4 assessments. It also documents project-specific risk-reducing (i.e., avoidance and minimization efforts) and offsetting measures and plan for postconstruction fatality surveys, developed in coordination with cooperating wildlife agencies. The plan will be developed in accordance with the ECPG and USFWS's final rule revising the regulations for permits for incidental take of eagles (Eagle Rule; 81 Federal Regulations 91494), incorporating Project-specific agency guidance as warranted.

Revegetation

Temporary disturbance areas will be restored and reclaimed using topsoil and native seed mixes to achieve preconstruction plant community conditions to the greatest extent practicable. In coordination with cooperating agencies, the Applicant also intends to prepare a revegetation plan in coordination with Navajo County and other cooperating agencies.

Weed Control

Indirect impacts could include the spread of noxious weed species resulting from construction equipment introducing seeds into new areas, or erosion or sedimentation due to clearing ground in the construction areas. Noxious weeds will be controlled and impacts minimized using weed-free seed mixes and controlled spraying in accordance with all local, state, and federal regulations, if necessary. Temporarily disturbed areas will be reseeded with certified weed-free seed mixes. Typical best management practices include cleaning vehicles and equipment arriving from areas with known invasive species issues, and using locally sourced topsoil. The Applicant also intends to prepare a noxious weed control plan in coordination with Navajo County and other cooperating agencies.

Site Drainage

Potential impacts to water resources from the construction and operation of the Wind Farm include erosion, impacts to drainage patterns, and impervious surfaces. Wind Farm facilities are being designed to minimize impacts on surface water resources, as discussed further in Exhibit H Attachment C *Wetlands and Other Waters of the U.S. Review of the West Camp Wind Farm*. Additionally, the Wind Farm facilities only require linear and intermittent footprints and are therefore not expected to cause significant changes in runoff patterns or volume. During construction, measures will be implemented to control erosion and reduce potential for sediment runoff from exposed soils during precipitation events.

Excavation Methods

Excavations for earthwork and foundation installation will be performed via typical construction and drilling machinery to the greatest extent practicable. Limited blasting may be needed in places. Consistent with Section 2008, all blasting work will be performed by a contractor licensed and bonded in the State of Arizona.

Decommissioning Plan

This Decommissioning Plan outlines standard decommissioning requirements and procedures that will be followed at the end of the Project's operational life. Prior to commencement of construction, the Project will secure or post a bond in a form reasonably acceptable to Navajo County sufficient to cover the removal and remediation costs in Navajo County that will be necessary to satisfy all decommissioning and reclamation requirements, net of salvage value. Such requirements and cost estimates will be subject to third-party review and verification.

Typical Decommissioning Requirements

- Remove turbines, all aboveground equipment, and any personal property.
- Remove pad mount and main power transformers.
- In general, remove subsurface components to a minimum depth of 3 feet below grade.
- Partially remove turbine foundations/footings to a depth of not less than 3 feet below the surface grade, followed by reclamation grading, compaction, and seeding.
- Remove meteorological tower, and partially remove foundation.
- Remove overhead transmission structures and conductors.
- Partially remove underground collection network cables to a depth of at least 3 feet.
- Remove substation and control house equipment.

- Remove and dispose of all materials in accordance with applicable local and state laws.
- Restore and revegetate the site to at least as good as the condition in existence upon commencement of the Project and take reasonable steps to prevent soil erosion through grading, compaction, and reseeding efforts.
- Access roads and road materials may remain in place to provide for landowner access, in consultation with the landowners and ASLD.

Wind Turbine Generator Removal

All aboveground wind turbine components will be disassembled and lowered via cranes and then removed from the site for reuse, recycling, or disposal. Temporary areas may be created for crane access, operation, and transport of components from the site. These areas will be returned to as close to native soil and vegetative conditions as possible upon completion.

Transformer Removal

Transformer components will be removed, and the materials will be reused or recycled if possible or disposed of in accordance with all applicable laws.

Foundation Removal

Foundation materials comprising concrete, rebar, anchor bolts, conduit, and electrical cabling will be removed down to a minimum depth of 3 feet below grade. All materials greater than 3 feet will be left in place. Following removal, foundations will be backfilled with native topsoil materials, compacted, and reclaimed through seeding with native plants.

Transmission Line Structures Removal

Transmission line conductors and poles will be removed. Typically, the entire pole including the foundation (if applicable) will be removed, and in no case will any materials less than 3 feet below grade remain.

Underground Collection Removal

Collector cabling will be installed typically 3 to 5 feet below grade; therefore, most of the collector cabling will be left intact, with the exception that all cabling down to a minimum depth of 3 feet from the surface will be removed. All cable and other materials greater than a depth of 3 feet will be left in place.

Substation Removal

All substation components including metal transmission structures, control houses, transformers, switches, circuit breakers, fencing, and lighting will be disassembled and removed from the site to be reused, recycled, or disposed. Foundations and underground equipment will be removed down to a minimum depth of 3 feet below grade. Following removal, all disturbed areas will be graded, compacted, and reclaimed through seeding with native plants.

Restoration, Grading, and Revegetation

Following equipment disassembly and removal, all disturbed areas will be graded to reasonably match the surrounding native areas, compacted to a similar state as existing native soils, and seeded with native vegetation.

Civil and Access Road Reclamation

As discussed above, access roads may remain in place. All access roads that were widened to facilitate long-term operation of the Project or disassembly and removal of components will be returned to a standard road width unless otherwise requested.

Economic Benefits

The Wind Farm is expected to bring millions of dollars of local and regional economic benefit to not only Navajo County but the state of Arizona. The Wind Farm is expected to employ over 500 people during construction and will have over 30 permanent, full-time positions during the 30-plus-year operating life at full buildout. Outside of the local economic benefits typically realized near rural renewable energy projects, such as increased property tax revenue and lease payments to rural ranching families, the Project will potentially be making right-of-way payments to the ASLD, which are directly passed to public education beneficiaries. Furthermore, millions of dollars of local spending during construction and operations is expected in the nearby communities of Joseph City, Holbrook, and Winslow, among others. Such spending typically consists of fuel, lodging, grocery, hardware store, construction materials, etc. Project expenditures are expected to include:

a. Over $1.5 million in annual local worker salary payments during operations.

b. At least $9.7 million of indirect local spending during construction, which include local businesses such as lodging, mechanics, fuel, meals, hardware, etc.

c. Over $700,000 of indirect local spending annually during operations, which include local businesses such as lodging, mechanics, fuel, meals, hardware, etc.

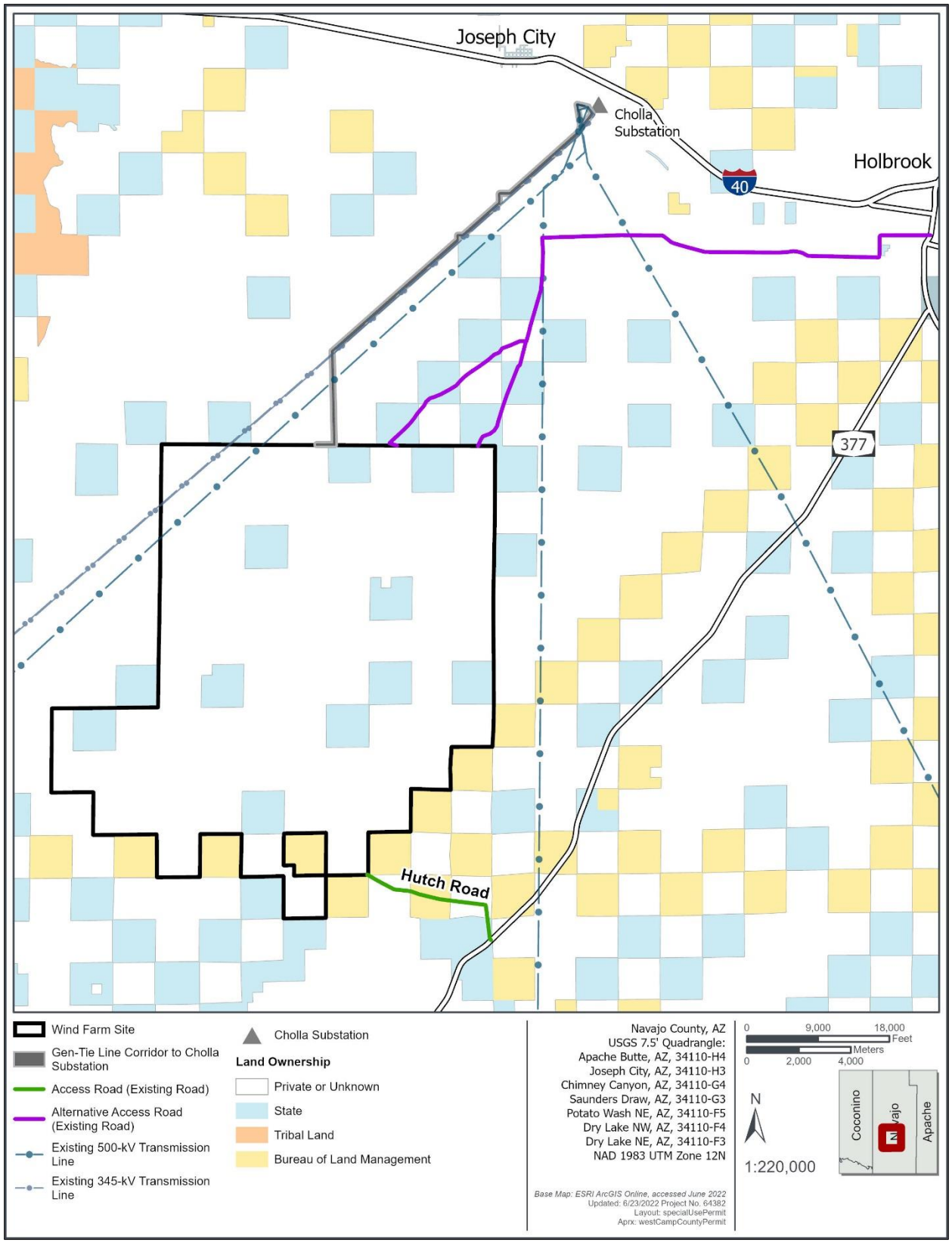

Figure 1. West Camp Wind Farm.

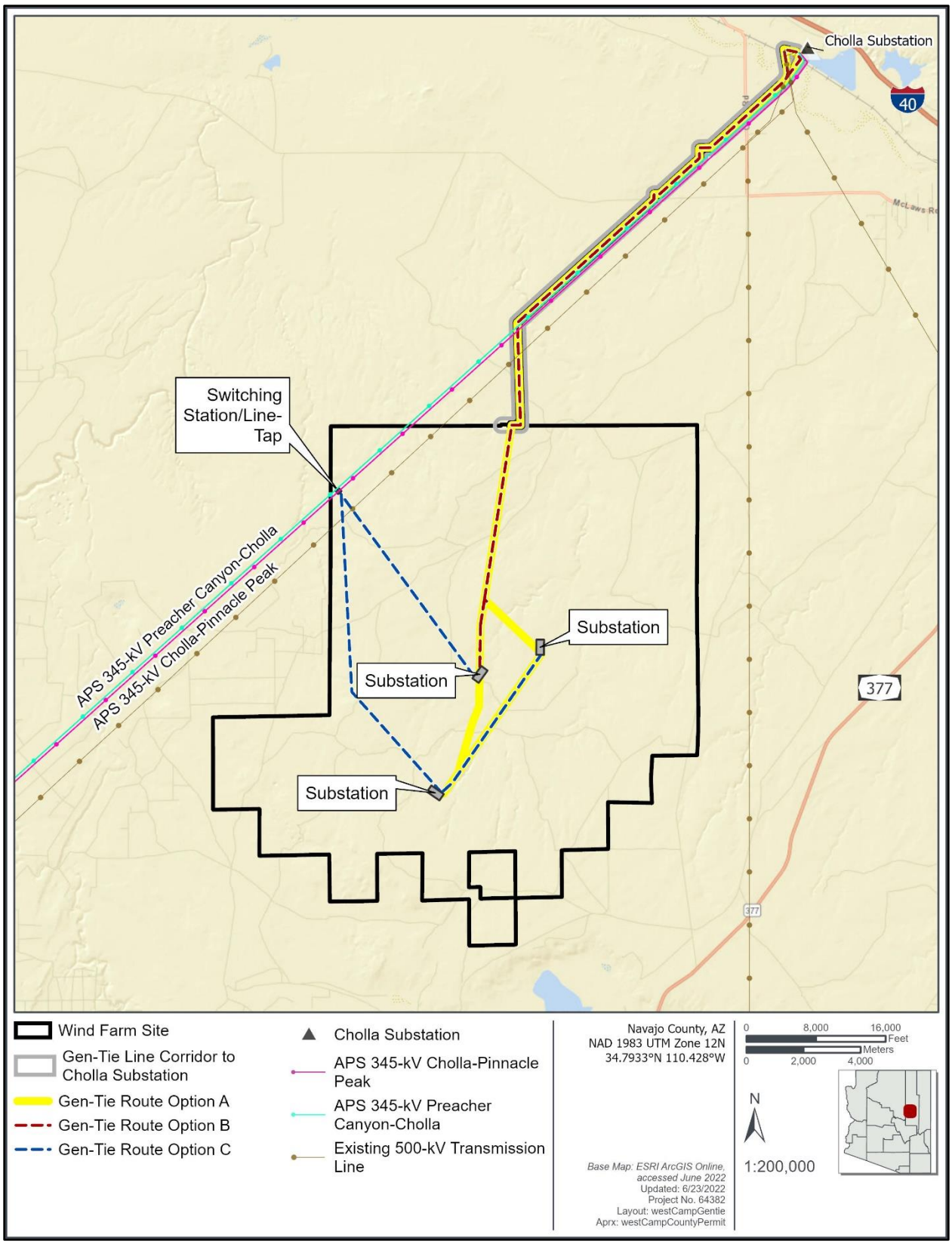

Figure 2. Conceptual Project Gen-Tie interconnect options.

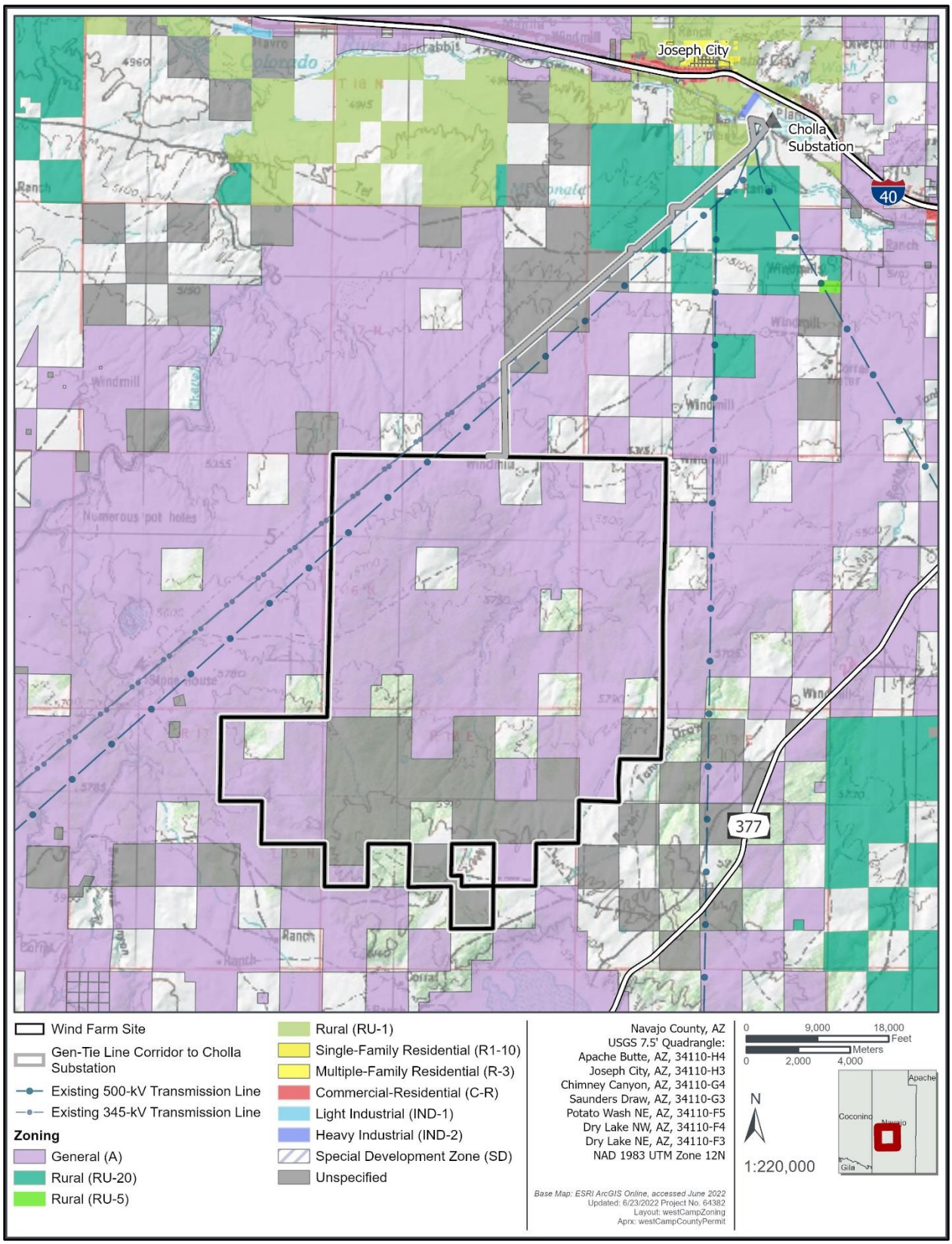

Figure 3. Zoning districts.

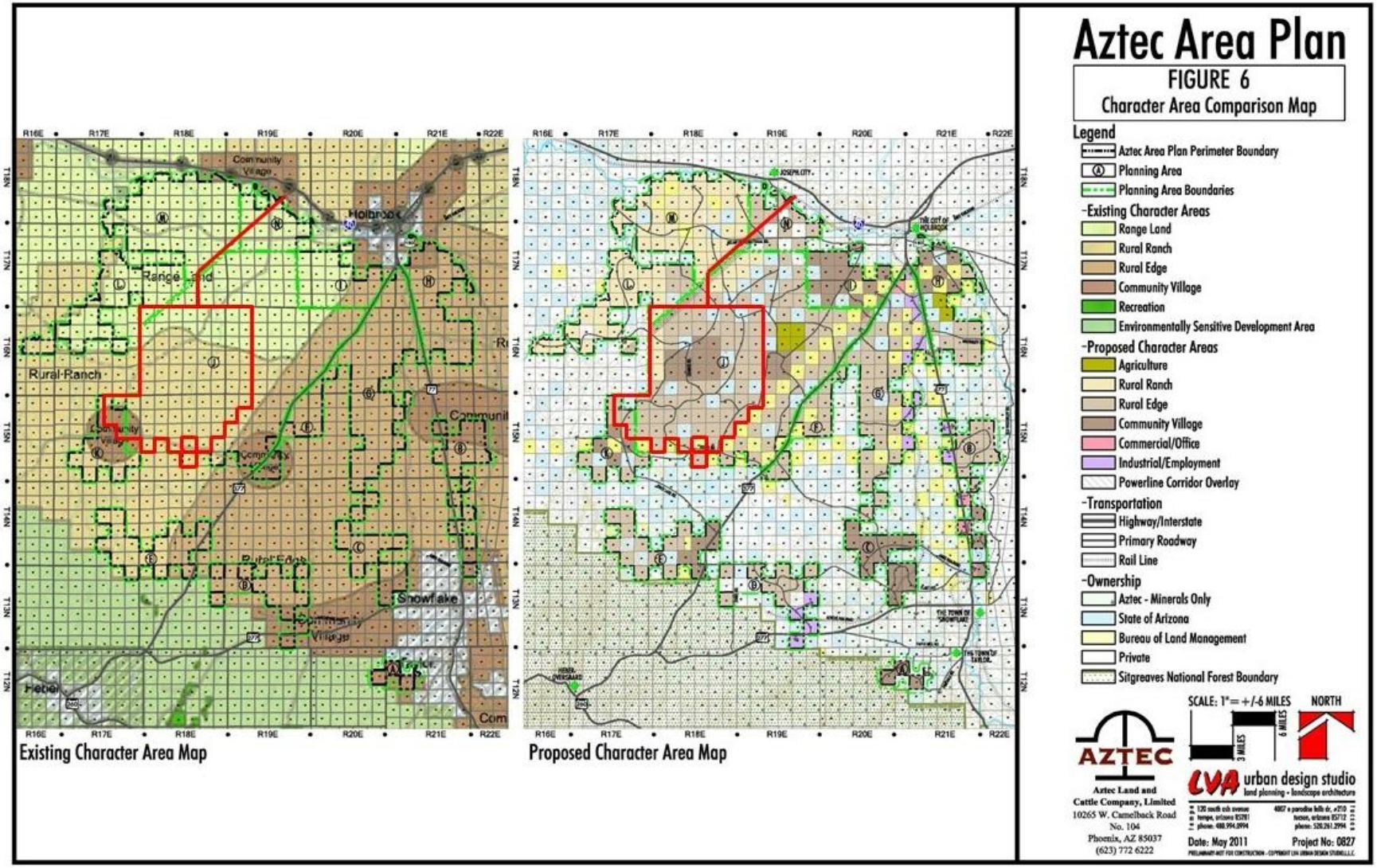

Figure 4. Land use designations (Project outlined in red).