Navajo County
Board of Supervisors
Public Meeting
09-13-2022
9:00 a.m.

P&Z Commission Agenda Item

APN 110-01-014, 110-06-001A, 110-06-001B, 110-06-002A, 110-06-002B, 111-07-002D, 111-03-021, 111-04-010, 111-08-003, 110-06-003, 111-03-018A, 111-03-018B, 111-08-001B, 111-08-002B, 111-03-001G, 111-08-001C, 111-08-001D, 111-08-001E, 111-08-002C, 111-08-002D, 111-08-002E, 111-04-002A, 111-04-001A, 111-03-001H, 111-03-001J, 111-01-001C, 111-01-001D, 110-04-001C, 111-04-001D, 111-04-002C, & 111-04-002D.

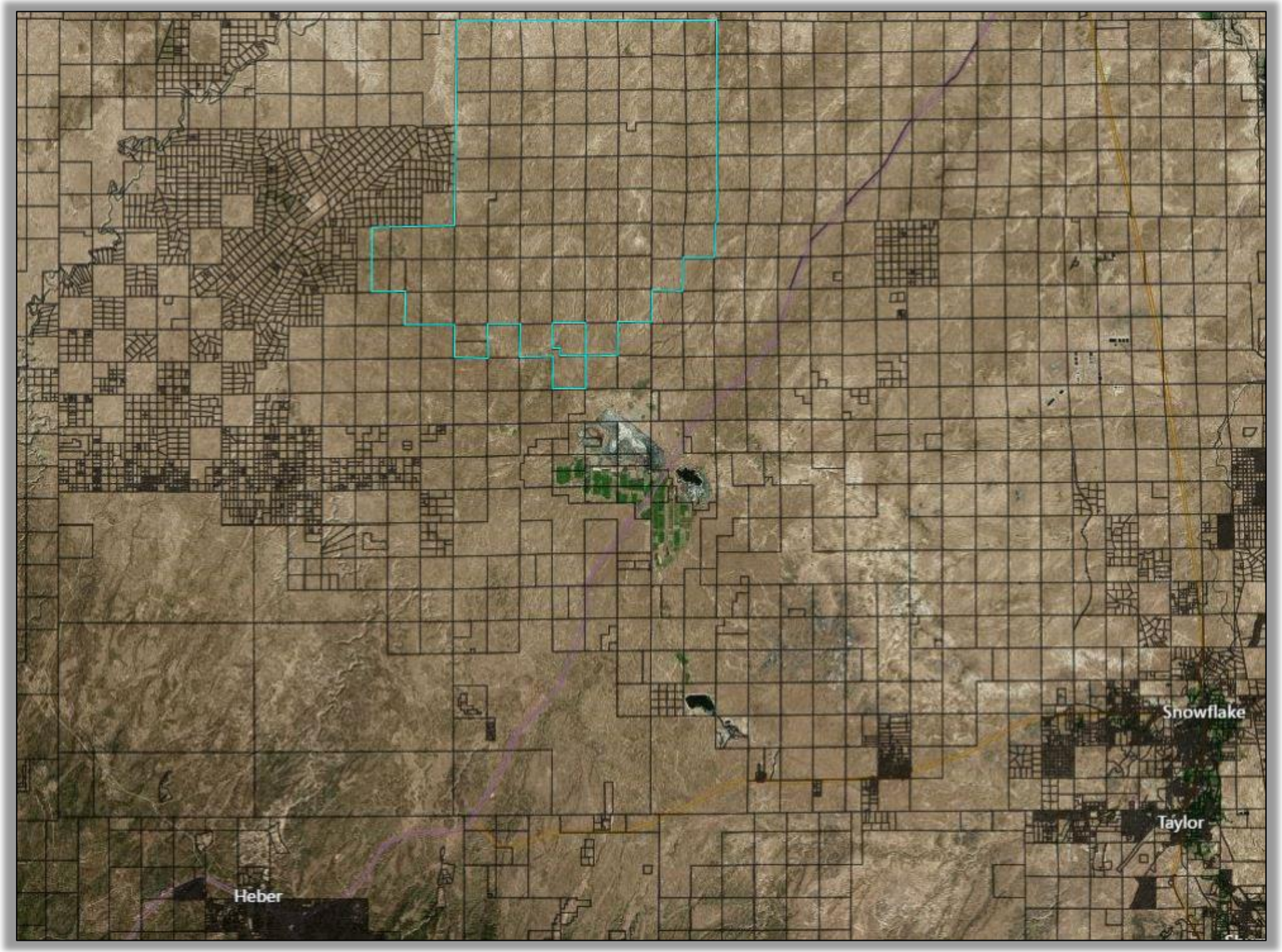
District III

Special Use Permit

(West Camp Wind Farm, LLC)

Project Components

- 500 MW wind energy generation
- 250 MW battery storage facility
- 52,500-acre project area
- 104 turbines
  - 820-foot maximum tip height
- Up to 2 on-site substations and one on-site switching station
- Between 6.5 and 25 miles of 345-kV or 500-kV Gen-Tie Line
- Up to 6 permanent meteorological towers
- On-site operation and maintenance (O&M) building and laydown yard
- Access Roads


Snowflake
Taylor
Heber

June 27, 2022

Cody Cooper
Navajo County Planning and Zoning Division
P.O. Box 668
100 Public Works Drive
Holbrook, Arizona 86025

Re: West Camp Wind Farm Navajo County Special Use Permit Application: SUP 22-007

Dear Mr. Cooper:

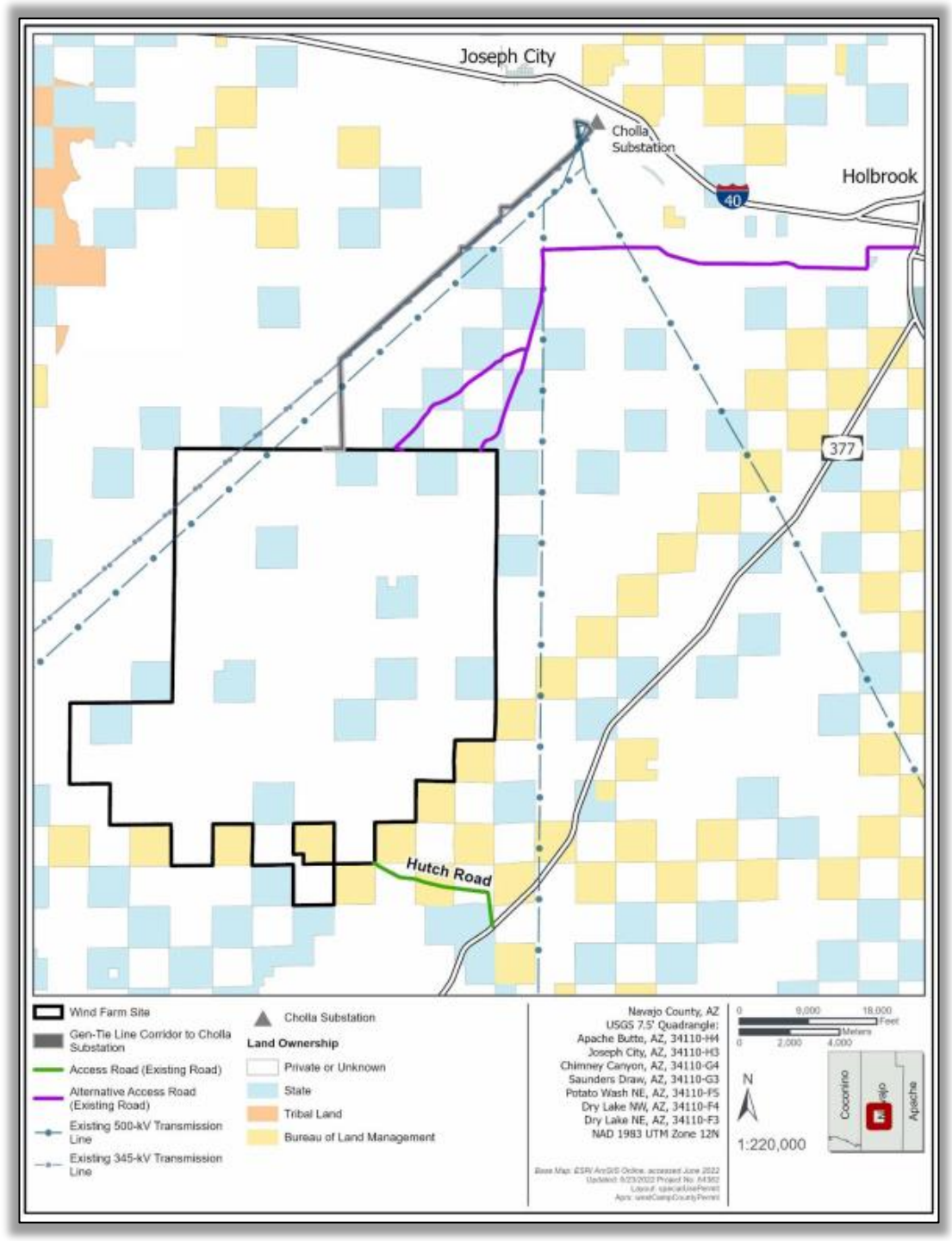
AES is pleased to submit this Special Use Permit application to Navajo County to allow construction and operation of a maximum 500-megawatt (MW) wind energy project and battery storage facility on almost entirely privately owned land approximately 10 miles south of Joseph City, Arizona, as further depicted and described in this application.

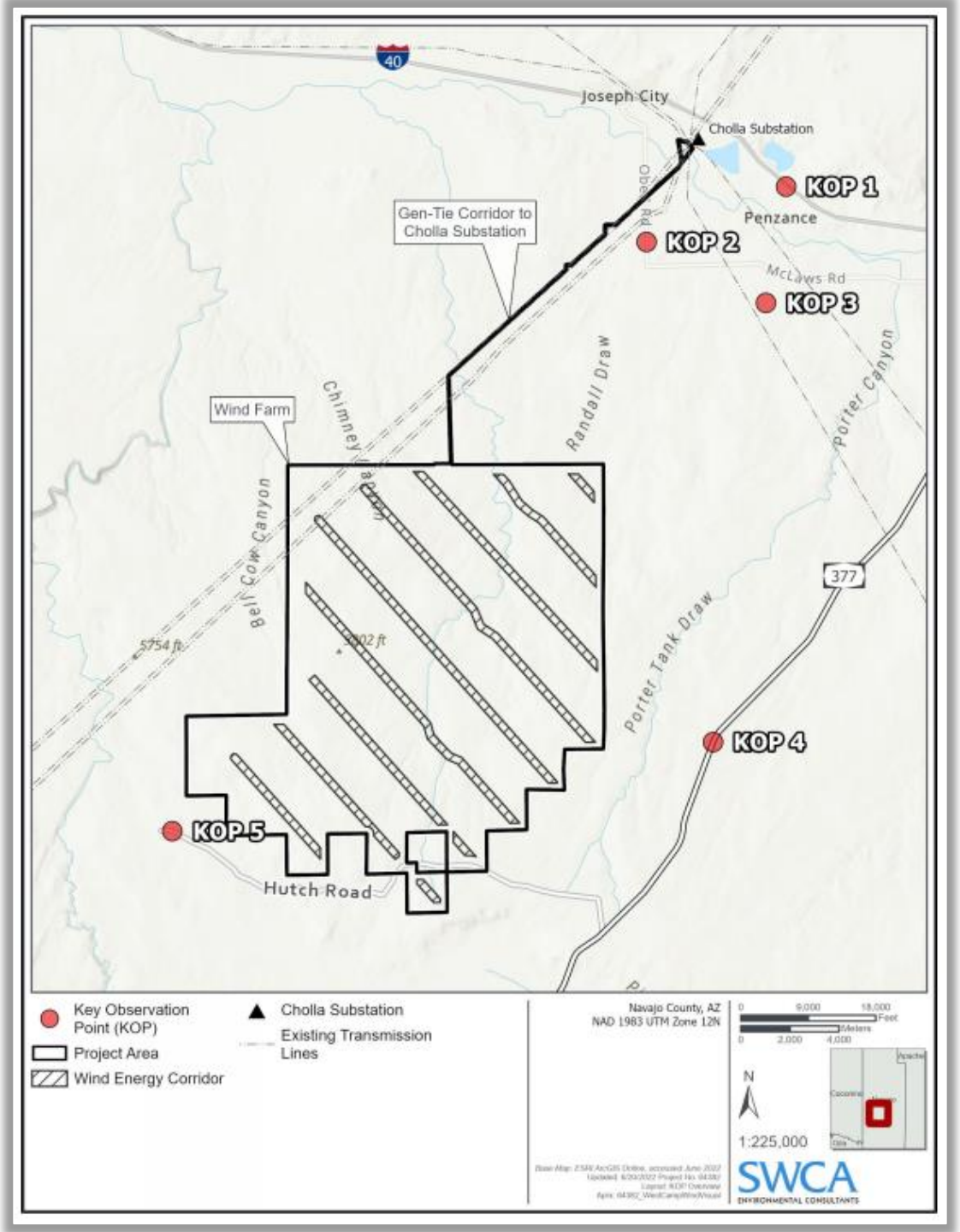
AES has engaged industry-leading experts to perform various environmental, cultural, and other siting studies to identify and mitigate impacts to applicable resources. We are committed to agency and stakeholder consultation and have been working with various local, state, and federal agencies in developing this planned wind energy project. The project is sited in a remote location away from residential and developed areas and incorporates all required setbacks from the project boundary. We have and will continue to engage with the adjacent landowners and the local community through mailings, public open houses, and continual updates to the project website (www.aes.com/west-camp-wind.com). The West Camp Wind Farm would bring many local economic and environmental benefits, as further described below, and we are excited to bring more cost-competitive, reliable, and air emissions-free electricity to northern Arizona.

Enclosed is Check No. 5571 in the amount of $10,000 for the Special Use Permit application fee. Should you have any questions, please feel free to contact me at 463-426-9980 or via email at robert.gardner@aes.com. We look forward to working with you on the West Camp Wind Farm as we continue to advance renewable energy in the state of Arizona.

Sincerely,

Rob Gardner
Manager, Western Wind Development
AES
282 Century Place #2000
Louisville, CO 80027


Joseph City
Cholla Substation
Holbrook
40
377
Hutch Road
Wind Farm Site
Gen-Tie Line Corridor to Cholla Substation
Access Road (Existing Road)
Alternative Access Road (Existing Road)
Existing 500-kV Transmission Line
Existing 345-kV Transmission Line
Cholla Substation
Land Ownership
Private or Unknown
State
Tribal Land
Bureau of Land Management
Navajo County, AZ
USGS 7.5' Quadrangle:
Apache Butte, AZ, 34110-H4
Joseph City, AZ, 34110-H3
Chimney Canyon, AZ, 34110-G4
Saunders Draw, AZ, 34110-G3
Potato Wash NE, AZ, 34110-F5
Dry Lake NW, AZ, 34110-F4
Dry Lake NE, AZ, 34110-F3
NAD 1983 UTM Zone 12N
0 9,000 18,000 Feet
0 2,000 4,000 Meters
N
1:220,000
Coconino
Navajo
Apache


40
Joseph City
Cholla Substation
KOP 1
Penzance
Gen-Tie Corridor to Cholla Substation
KOP 2
McLaws Rd
KOP 3
Wind Farm
Chimney Canyon
Randall Draw
Porter Canyon
Bell Cow Canyon
5754 ft
5902 ft
377
Porter Tank Draw
KOP 4
KOP 5
Hutch Road
Key Observation Point (KOP)
Project Area
Wind Energy Corridor
Cholla Substation
Existing Transmission Lines
Navajo County, AZ
NAD 1983 UTM Zone 12N
0 9,000 18,000 Feet
0 2,000 4,000 Meters
N
1:225,000
SWCA
ENVIRONMENTAL CONSULTANTS

KOP 1: View from Interstate 40 and Frontage Road looking southwest - Existing Condition

KOP 1: View from Interstate 40 and Frontage Road looking southwest - Simulated Condition

KOP 2: View from Obed Road looking north - Existing Condition

KOP 2: View from Obed Road looking north - Simulated Condition

KOP 3: View from Lx Ranch Road and Angel Light Lane looking southwest - Existing Condition

KOP 3: View from Lx Ranch Road and Angel Light Lane looking southwest - Simulated Condition

KOP 4: View from Highway 377 looking west - Existing Condition

KOP 4: View from Highway 377 looking west - Simulated Condition

KOP 5: View from Hutch Road looking northeast - Existing Condition

KOP 5: View from Hutch Road looking northeast - Simulated Condition

Douglas A. Ducey
Governor

Lisa A. Atkins
Commissioner

Arizona State Land Department

1616 West Adams, Phoenix, AZ 85007
(602) 542-4631

June 24, 2022

Robert Gardner
West Camp Wind Farm, LLC
282 Century Place # 2000
Louisville, CO 80027

RE: State Trust Land located in Navajo County at T15N, R17E Section 2; T15N, R18E Sections 2 and 16; T16N, R18E Sections 2, 16, 24, 32, 36; T16N, R19E Section 6 and 32
ASLD Special Land Use Permit No. KE# 23-122954
West Camp Wind Farm – Special Use Permit Application Number 22-007 for a Wind Energy and Battery Storage Facility

Dear Robert Gardner,

The Arizona State Land Department ("ASLD") has received a request from The AES Corporation representing West Camp Wind Farm, LLC for permission to act as an authorized agent for ASLD to apply to Navajo County (the "Jurisdiction") for a Special Use Permit (the "Entitlements") on State Trust land described above.

The AES Corporation, its employees, representatives, agents, and/or consultants (hereinafter "Applicant") therefore, has permission to file for the Entitlements as required by the Jurisdiction.

Please be advised the following conditions and understandings accompany this approval:

1. Applicant shall pay all costs associated with the Entitlements and shall not be reimbursed by ASLD or by any subsequent purchaser at auction.

2. Applicant, their employees, representatives, agents, and/or consultants shall be permitted to act as ASLD's agents to procure the Entitlements and any related permits or approvals which may be required (the "Entitlement Process"), subject to final review and approval by ASLD.

3. Applicant shall diligently pursue the satisfaction of all Entitlements. Further, it shall respond to all inquiries by ASLD as to the status of the Entitlement Process and provide regular updates without formal request.

4. Prior to beginning the Entitlement Process, the Applicant shall provide ASLD with an outline of the proposal and a timeline for the process which identifies key dates with the Jurisdiction or other jurisdictional agency staff and project hearing dates with any agency or jurisdiction. All documentation, including, but not limited to: land use plans, engineering drawings, application materials and development agreements, shall be submitted to ASLD for approval prior to the date the documentation is filed with the approving jurisdiction. A copy of the application shall be submitted to ASLD on the same day it is filed with the Jurisdiction or other jurisdictional agency.

5. ASLD staff shall be invited, but not required to attend, all meetings with the various agencies, elected officials, and the Jurisdiction as the Entitlements are processed through relevant hearings. A minimum of five (5) business days' notice shall be provided to Department staff in advance of any meeting.

6. Applicant shall submit to ASLD all staff reports and draft stipulations that will be considered by the Jurisdiction on the day they are received by the Applicant, and at least ten (10) business days before each public meeting or hearing, if possible.

7. The Jurisdiction is authorized to enter and inspect the subject property.

8. This authorization may be revoked at any time without notice and in no way creates an obligation on the part of ASLD of any kind.

All information will be provided to Amber Troidl, ASLD's Right of Way with a copy to Rhonda Inamine, ASLD Planning and Engineering Division.

ASLD appreciates your consideration in this matter and looks forward to working with you through this process. Please contact Amber Troidl at 602-542-3140 or atroidl@azland.gov or Rhonda Inamine at 602-542-3126 or rinamine@azland.gov if you have any questions.

Sincerely,

Mark Edelman, AICP
Executive Consultant, Urban Development

cc: Amber Troidl, ASLD Right-of-Way
Rhonda Inamine ASLD Planning & Engineering

June 17, 2022

Mr. Rob Gardner
Developer, Western Wind Development
AES Clean Energy, LLC
282 Century Pl #2000
Louisville, CO 80027

Electronically submitted to: windlandowners@aes.com, Robert.Gardner@aes.com, and agraber@swca.com

RE: West Camp Wind Farm, Navajo County SUP

Dear Mr. Gardner:

The Arizona Game and Fish Department (Department) appreciates the opportunity to coordinate with AES Clean Energy, LLC (AES) and SWCA Environmental Consultants (SWCA) on the proposed West Camp Wind Farm. The Department understands that this 500MW facility would include 104 wind turbines on approximately 53,000 acres of private land south of Joseph City and west of Arizona State Route 377. The site includes grasslands, pinyon-juniper, and xeric riparian habitats. The project would include a new gen-tie line and associated infrastructure, including access roads, a parking area, storage and operations facilities, permanent meteorological towers, and an Aircraft Detection Lighting System.

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

The Department appreciates the opportunity to coordinate with AES and SWCA in the planning phases of this project, and supports the development of wind energy as a source of clean and renewable energy. The Department believes that, with proper placement and planning, the benefits of wind energy outweigh potential negative effects to wildlife populations.

The Department looks forward to reviewing the preliminary results of pre-construction surveys and monitoring that are being conducted to determine species presence, and staff remain available to assist with the next phases of project planning. As noted in the Department's

Guidelines for Reducing Impacts to Wildlife for Wind Energy Development in Arizona[1] (*Guidelines*), wind energy farms can affect wildlife through a variety of means, including direct fatality, habitat loss and fragmentation, behavior modification, introduction of invasive plant species, and more. Appropriate siting and placement of project facilities, timing of construction activities, voluntary implementation of best management practices and operational considerations can help avoid, minimize, or mitigate these potential impacts; the Guidelines provide additional information about these conservation measures. Given project specifics received to date, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

The project area and surrounding landscape are used by a diversity of wildlife species, including Species of Greatest Conservation Need (SGCN) and species of economic and recreational importance. Species of key concern in this area include pronghorn, raptors, and bats. The project is proposed within one of the most productive pronghorn sites in the state and would cover a large area of available habitat for this population. Unlike other states with pronghorn, Arizona does not see a lot of ingress and egress between populations, which are separated by roads and other physical barriers. To help reduce potential effects, the Department recommends incorporating the following conservation measures to project planning, development and operation for pronghorn:

- The Department recommends that construction be phased to reduce the disturbance to pronghorn during construction and to reduce the amount of area being disturbed at any given time. Additionally, to help minimize potential impacts on pronghorn recruitment, the Department recommends that construction activities be kept to a minimum during the fawning season from mid-May to mid-June.
- The Department recommends the number and extent of new access roads be kept to a minimum, and recommends restoration of habitats disturbed during construction.
- The project occurs within and adjacent to identified habitat connectivity areas, and Important Connectivity Zones. These areas have been identified as important for pronghorn and other wildlife to traverse the landscape to access resources and respond to changing environmental conditions. Department staff remain available to assist with project design features that can help maintain connectivity for wildlife including increased inter-turbine distance as feasible, and fence designs and locations to ensure that fencing is permeable to pronghorn. The Department's *Wildlife Compatible Fencing Guidelines*[2] provide information on how fencing impacts wildlife and ways to design fencing to prevent wildlife entanglement and impalement and to ensure wildlife movement is not restricted.

Avian and bat mortality at wind facilities can be significant. The pre-construction surveys that are occurring can help identify species and areas of concern, and the Department looks forward to continued engagement with AES in identification of options that can reduce potential impacts.

[1] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/RevisedAZWildGuidelinesOctober2012.pdf
[2] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125_AGFD_fencing_guidelines.pdf

Post-construction surveys and monitoring can help determine if adaptive management is needed. To help reduce mortality, the Department initially recommends the following broad conservation measures; additional recommendations may be suggested after receipt of the site characteristic report and pre-construction survey results:

- The Department recommends developing a Wildlife Conservation Strategy (WCS), a Bird and Bat Conservations Strategy (BBCS) and an Eagle Conservation Plan (ECP) as part of the project planning. These are voluntary plans put forth by developers in order to proactively address potential impacts to wildlife resulting from the construction, maintenance, and operation of a wind facility. Guidelines for these plans can be found in the Department's *Guidelines for Reducing Impacts to Wildlife for Wind Energy Development in Arizona*[3]
- The Department recommends development of a post-construction wildlife fatality monitoring plan. The Department would like to review this plan, along with the BBCS, ECP, and WCS if developed, prior to implementation. In addition, the Department would like to review the results of the post-construction wildlife fatality monitoring on an annual basis, including any info/monitoring that may occur once formal fatality monitoring has completed. Additionally, the Department recommends the formation of a Technical Advisory Committee (TAC) that would meet at least annually to discuss implementation of these plans. Representatives could include AES, Navajo County, USFWS, and others in addition to the Department.
- The Department recommends a quarter-mile turbine setback from water sources to protect migrating waterfowl and shorebirds (Jones et al. 2010[4]), help maintain wildlife access, and buffer waters from potential water contamination (NIEA 2015[5]). Several ephemeral stock tanks, check dams, and shallow rocky canyons occur within the project area that could be important to wildlife. Pre-construction surveys conducted to-date were done in drier years, but it is possible that these areas are used by waterfowl and could attract eagles.
- The Pink Cliffs on the southern end of the project provide habitat for a wintering population of bald eagles. The Department recommends turbines be set back 1 mile from this area and a quarter-mile setback from any active ferruginous hawk or other raptor nests.
- The project area provides habitat for diverse species of bats. The Department recommends considering nighttime cut-in speeds for all turbines during spring and fall bat migration throughout the life of the project if bat fatalities exceed their thresholds. The Department is available to assist AES and SWCA in determining the timeframes and conditions when turbine curtailment could take effect, and post-construction monitoring can help identify further conservation measures. The potential for integrating battery storage into this wind project could allow for incorporating these cut-in speed bat fatality mitigations while maintaining continuous energy supply.

[3] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/RevisedAZWildGuidelinesOctober2012.pdf
[4] https://rewi.org/wp-content/uploads/2020/11/WWRMVIII_2010_Proceedings.pdf
[5] https://niopa.qub.ac.uk/bitstream/NIOPA/7351/1/Wind%20farms%20and%20groundwater%20impacts.pdf

To address potential effects to other wildlife species, wildlife habitat, human safety, and wildlife-oriented recreation, the Department recommends the following measures:

- Development of an adaptive weed and erosion mitigation plan, covering construction and operational phases of the project, that addresses road shoulders and disturbed areas, including provisions for preventing the spread of invasive species and re-seeding with native species.
- If milkweed plants are present, please avoid removal to the extent possible. These plants are important for monarch butterflies, which are a candidate for listing under the Endangered Species Act and are declining throughout their range.
- Artificial lighting can attract nocturnal animals (including birds and bats), impair their ability to navigate, and may affect their behaviors (Davies et. al. 2013[6]). Federal Aviation Administration (FAA)-required red lighting should be installed on turbines according to FAA guidelines for wind energy (FAA 2020[7]). If additional lighting is needed near the ground, consider using only the minimum amount necessary for safety. Motion-sensing lights and narrow-spectrum lighting are preferred, as well as ensuring that all lighting is fully shielded and dark-sky compliant (USFWS 2012[8]).
- To reduce impacts on hunters, the Department requests continued coordination on proposed starting/ending times for construction so the Department can adjust tag numbers if necessary and/or notify constituents of closures during proposed hunts and seasons. Notification of the construction timeline will also enable the Department to account for any adjustments to access agreements with the lessee.

Finally, Department staff routinely conduct low level wildlife survey and monitoring flights. The Department requests that AES provide coordinates for any new meteorological evaluation towers (METs) installed or decommissioned during the project. These coordinates will be incorporated into a database and shared with Department pilots to protect the safety of personnel conducting low-altitude flights.

Thank you for the opportunity to provide input on the West Camp Wind Farm. The Department looks forward to continued collaboration as this project progresses. For further coordination, please contact Tiffany Sprague at tsprague@azgfd.gov or 623-236-7222.

Sincerely,

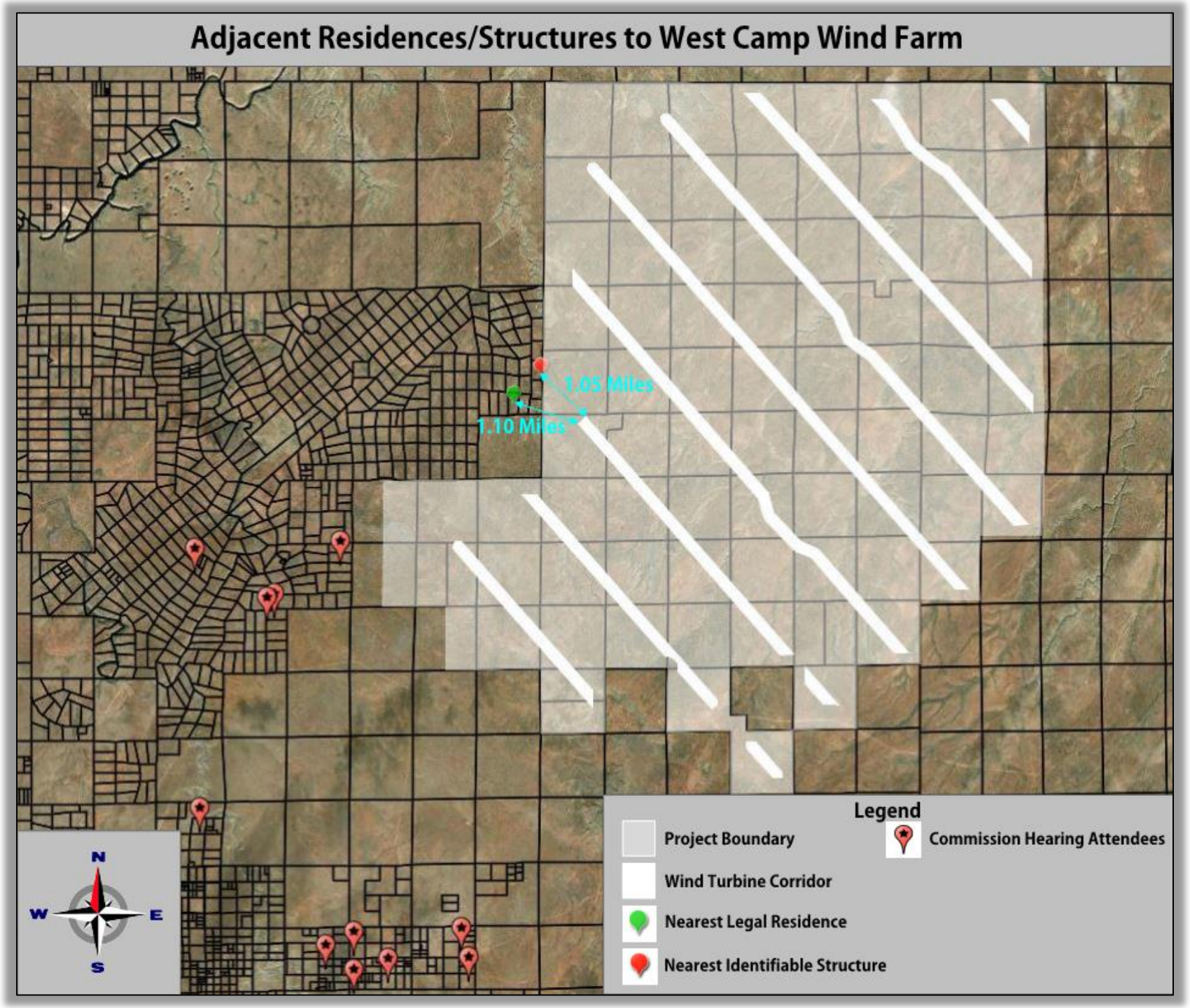
Luke Thompson
Habitat, Evaluation, and Lands Branch Chief

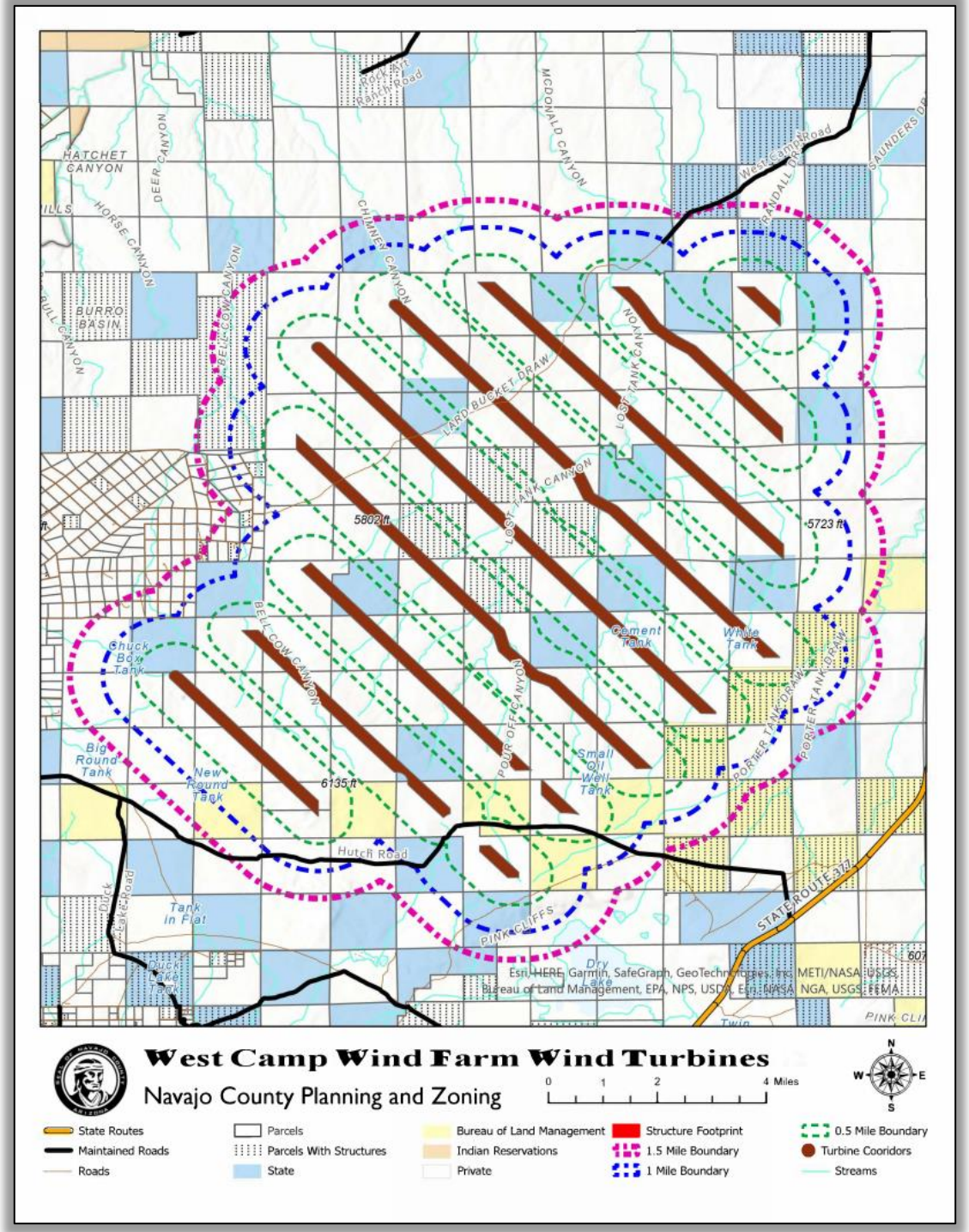
cc: David Dorum, Region I Habitat, Evaluation, and Lands Program Supervisor
Ginger Ritter - Project Evaluation Program Supervisor
Tiffany Sprague - Project Evaluation Program Specialist

[6] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119
[7] https://www.faa.gov/documentLibrary/media/Advisory_Circular/Advisory_Circular_70_7460_1M.pdf
[8] https://www.fws.gov/media/land-based-wind-energy-guidelines

Condition 19

- The setbacks for wind turbines from any adjacent, non-participating, privately owned property on the western boundary of this project shall be ½ miles (2,640 feet).


Adjacent Residences/Structures to West Camp Wind Farm
1.05 Miles
1.10 Miles
N
W
E
S
Legend
Project Boundary
Wind Turbine Corridor
Nearest Legal Residence
Nearest Identifiable Structure
Commission Hearing Attendees


HATCHET CANYON
DEER CANYON
HORSE CANYON
BURRO BASIN
BELL COW CANYON
CHIMNEY CANYON
MCDONALD CANYON
LARD BUCKET DRAW
LOST TANK CANYON
POOR OFF CANYON
PORTER TANK DRAW
Rock Tank Road
West Camp Road
PINDALL DR
SAUNDERS DR
5802 ft
5723 ft
6135 ft
Chuck Box Tank
Big Round Tank
New Round Tank
Cement Tank
White Tank
Small Oil Well Tank
Hutch Road
Duck Lake Road
Tank in Flat
Duck Lake Tank
Dry Lake
PINK CLIFFS
STATE ROUTE 377
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS, FEMA
West Camp Wind Farm Wind Turbines
Navajo County Planning and Zoning
0 1 2 4 Miles
N W E S
State Routes
Maintained Roads
Roads
Parcels
Parcels With Structures
State
Bureau of Land Management
Indian Reservations
Private
Structure Footprint
1.5 Mile Boundary
1 Mile Boundary
0.5 Mile Boundary
Turbine Cooridors
Streams