Volume I of IV

Eagle Eye Thermal Plant & Gen-Tie Project

Application for a Certificate of Environmental Compatibility

Prepared for:
Arizona Power Plant and Line Siting Committee

Prepared by:
EAGL, LLC

Case # 263
Docket #
L-21323A-26-0244-00263

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Power when you need it

June 2026

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BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF EAGL, LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES § 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE EAGLE EYE ENERGY CENTER PROJECT, LOCATED IN LA PAZ COUNTY, ARIZONA	DOCKET NO.: Case No. **NOTICE OF FILING APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILTY**

EAGL, LLC, a Delaware limited liability company ("Applicant") through undersigned counsel, provides notice of filing of the Application for a Certificate of Environmental Compatibility for the Eagle Eye Energy Center Project under A.R.S. § 40-360.03.

Communications concerning the Application should be addressed to:

Albert H. Acken
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RESPECTFULLY submitted this 16 day of June, 2026, by:

ACKEN LAW

By: */s/ Albert H Acken*
Albert H. Acken
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Attorney for EAGL, LLC

ORIGINAL e-filed and eight copies hand-delivered
on June 16, 2026, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered on
June 16, 2026, to:

Adam Stafford, Chairman
Arizona Power Plant and
Transmission Line Siting Committee
Assistant Attorney General
Attention: Tod Brewer
15 South 15th Avenue
Phoenix, AZ 85004

COPIES of the foregoing e-mailed on
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By: *aha*

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LIST OF ACRONYMS

A.R.S.	Arizona Revised Statutes
ACC	Arizona Corporation Commission
ACHP	Advisory Council on Historic Preservation
ADEQ	Arizona Deparment of Environmental Quality
ADOT	Arizona Department of Transportation
ADWR	Arizona Department of Water Resources
AERMOD	American Meteorological Society / Environmental Protection Agency Regulatory Model
AF	Acre-Feet
AF/yr	Acre-Feet Per Year
AM	Amplitude Modulation
amsl	Above Mean Sea Level
ANPL	Arizona Native Plant Law
APLIC	Avian Power Line Interaction Committee
Applicant	EAGL, LLC
Application	This Application
APS	Arizona Public Service
ARHP	Arizona Register of Historic Places
ARO	Archaeological Records Office
ASLD	Arizona State Land Department
ASLD Land	Arizona State Trust Land managed by the Arizona State Land Department
ASM	Arizona State Museum
AWCS	Arizona Wildlife Conservation Strategy
AZDA	Arizona Department of Agriculture
AZGFD	Arizona Game and Fish Department
BACT	Best Available Control Technology
BCC	Birds of Conservation Concern

BESS	Battery Energy Storage System
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMPs	Best Management Practices
CCA	Candidate Conservation Agreement
CCAA	Candidate Conservation Agreement with Assurances
CEC	Certificate of Environmental Quality
Certificated Case No. 236 Corridor	Certificated Gen-Tie Corridor Under Case No. 236
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
CPA	Comprehensive Plan Agreement
CT	Combustion Turbine
CTG	Combustion turbine generator
CUP	Conditional Use Permit
dB	Decibels
dBA	A-weighted Decibels
Energy Center	Eagle Eye Energy Center Project
EPNG	El Paso Natural Gas
ERT	Online Environmental Review Tool
ESA	Endangered Species Act of 1973
FHWA	Federal Highway Administration
FM	Frequency Modulation
Gen-Tie or Proposed Gen-Tie	Transmission Generation Tie-Line
GHG	Greenhouse Gas
GIS	Geographical Information Systems
GLO	General Land Office
HAP	Hazardous Air Pollutant
HDMS	Heritage Data Management System
HHV	Higher Heating Value

HNAPZ	High Nose or Accident Potential Zone
IBAs	Important Bird Areas
IFC	International Finance Corporation
IO	Isolated Occurrence
IPaC	Information for Planning and Consultation
ISO	International Organization for Standardization
KOP	Key Observation Point
KPE	KP Environmental, Inc.
kV	Kilovolt
La Paz County Comprehensive Plan	La Paz County 2035 Comprehensive Plan
Ldn	24-hour average sound level
L_{eq}	Equivalent Sound Level
MBTA	Migratory Bird Treaty Act
MCPA	Minor Comprehensive Plan Amendment
MMBtu	Million British Thermal Units
MPS	Miles Per Hour
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NEPA	National Environmental Policy Act
NOx	Nitrogen oxide
NRHP	National Register of Historic Places
NSPS	New Source Performance Standards
NSR	New Source Review
OHV	Off-Highway Vehicle
OxCat	Oxidation Catalyst
PAD	Planned Area Development
PD	Planned Development
PDC	Proposed Design Configuration

PEP	Project Evaluation Program
POI	Point of Interconnect
Project	Eagle Eye Thermal Plant and Gen-Tie Project
PSD	Prevention of Significant Deterioration
PV	Photovoltaic
RA	Rural Agriculture
RMP	Resource Management Plan
ROW	Right-of-Way
SIL	Significant Impact Level
SF_6	Sulfur Hexafluoride
SCR	Selective Catalytic Reduction
SGCN	Species of Greatest Conservation Need
SHPO	State Historic Preservation Officer
Solar Facility	Solar Photovoltaic Generation Facility
Solar Substation	Substation Associated with the Solar Facility and BESS
SoundPLAN	SoundPLAN Essential Model Version 9.1
SR	State Route
SWAP	State Wildlife Action Plan
The Application	EAGL, LLC
Thermal Plant	Simple-Cycle Power Generation
Thermal Plant Substation	Substation Associated with the Thermal Plant
TPY	Tons Per Year
UCCD	Use Compatibility and Consistency Determination
ULSD	Ultra Low Sulphur Diesel
UR	Under Review
US 60	United States Highway 60
USEPA	U.S Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service

USLD	Ultra Low Sulfur Diesel
VOC	Volatile Organic Compound
WAPA	Western Area Power Administration
WSC	Wildlife Species of Concern

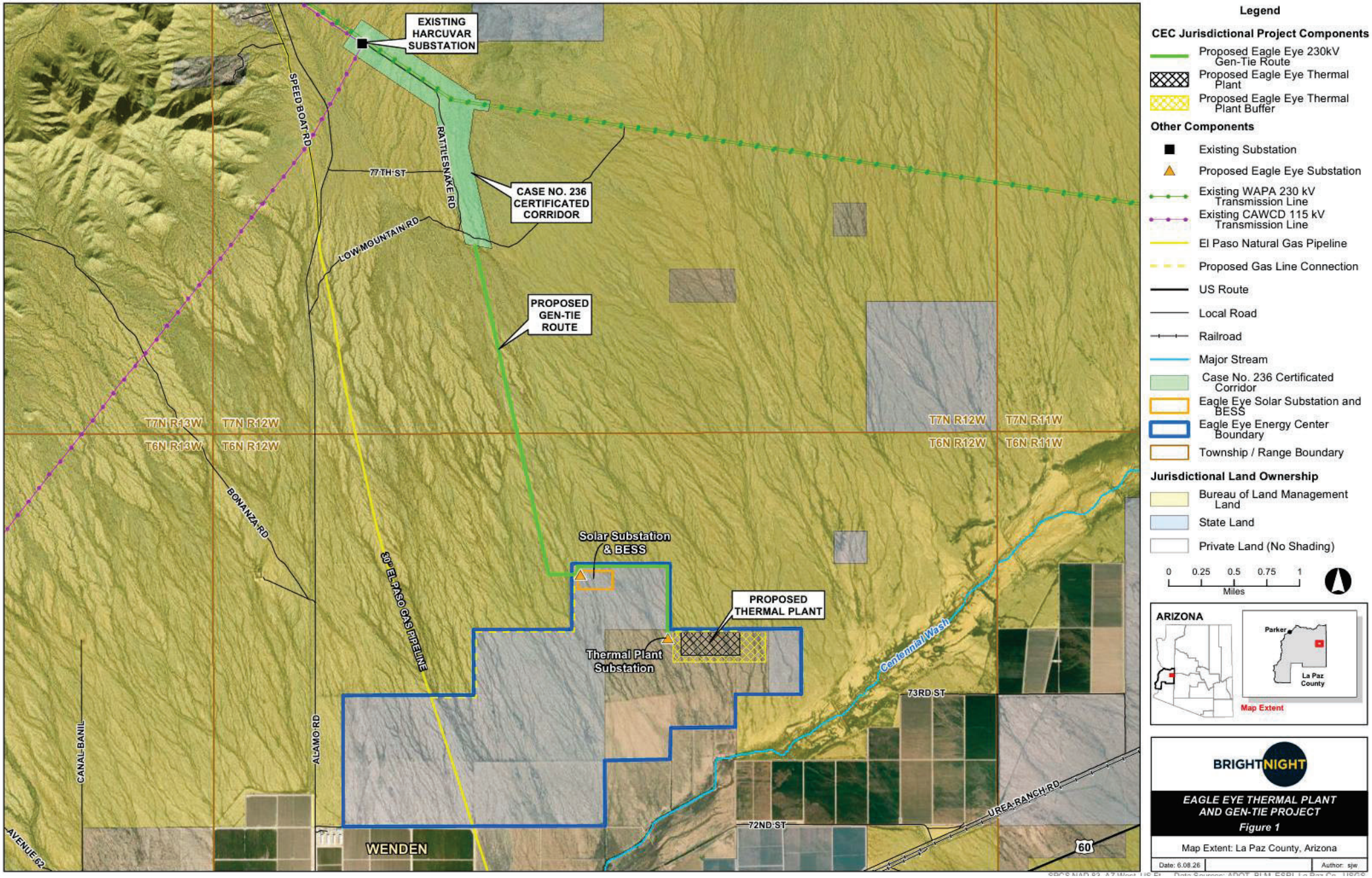
INTRODUCTION

EAGL, LLC (the Applicant), under Arizona Revised Statute (A.R.S.) § 40-360 et seq., submits this application (Application) for a Certificate of Environmental Compatibility (CEC) to develop the Eagle Eye Thermal Plant and Gen-Tie Project (Project). The Applicant is requesting a CEC for up to 700 megawatts (MW) of simple-cycle power generation (Thermal Plant) located on private land, as well an approximately 4.3-mile 230 kilovolt (kV) transmission generation tie-line (Gen-Tie or Proposed Gen-Tie) located on private, Bureau of Land Management (BLM), and Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land). The Thermal Plant and Proposed Gen-Tie are collectively referred to as the Project.

The overall Eagle Eye Energy Center (Energy Center), as depicted on **Figure 1**, includes the Thermal Plant as well as an up to 400 MW solar photovoltaic (PV) generation facility (Solar Facility) that would be paired with an up to 400 MW battery energy storage system (BESS).

The Proposed Gen-Tie would originate from a substation associated with the Thermal Plant (Thermal Plant Substation) and travel along the northern Energy Center boundary to a collection substation associated with the Solar Facility and BESS (Solar Substation), located on the central northern boundary of the Energy Center, and then travel north/northwest to the Certificated Gen-Tie Corridor under Case No. 236 (Certificated Case No. 236 Corridor), which ultimately connects to the existing Harcuvar Substation.

The total length of the Proposed Gen-Tie required to connect the Thermal Plant Substation to the Harcuvar Substation is approximately 6.1 miles. However, a portion of the total Gen-Tie required for the Project has been granted by the Arizona Corporation Commission (ACC) in December 2024 (Certificated Case No. 236 Corridor). Case No. 236 consisted of an approximately 1.8-mile gen-tie from the Energy Center (previously referred to as the Eagle Eye Solar Project) to the Harcuvar Substation. The Energy Center was previously located entirely on BLM land, directly north of the currently proposed Project site discussed herein, and consisted only of solar PV generation, BESS, and ancillary facilities. As part of development of the previous project, the Applicant conducted various environmental studies and extensive community and stakeholder outreach throughout 2024 and 2025. Since the approval of Case No. 236, the Project was revised in order to co-locate natural thermal generation, solar generation, and BESS in a manner that allows the generating facilities to serve multiple purposes, and the Energy Center site was moved directly south to private and ASLD Land. The central to southern portions of the Gen-Tie were realigned with the Energy Center; therefore, the revised Gen-Tie alignment from the Energy Center to the existing Harcuvar Substation would utilize 1.8 miles of the Certificated Case No. 236 Corridor.


EXISTING HARCUVAR SUBSTATION
SPEED BOAT RD
RATTLESNAKE RD
77TH ST
CASE NO. 236 CERTIFICATED CORRIDOR
LOW MOUNTAIN RD
PROPOSED GEN-TIE ROUTE
T7N R13W
T7N R12W
T6N R13W
T6N R12W
T7N R12W
T7N R11W
T6N R12W
T6N R11W
BONANZA RD
Solar Substation & BESS
30" EL PASO GAS PIPELINE
PROPOSED THERMAL PLANT
Thermal Plant Substation
Centennial Wash
73RD ST
CANAL-BANIL
ALAMO RD
UREA RANCH RD
72ND ST
AVENUE 62
WENDEN
60
Legend
CEC Jurisdictional Project Components
Proposed Eagle Eye 230kV Gen-Tie Route
Proposed Eagle Eye Thermal Plant
Proposed Eagle Eye Thermal Plant Buffer
Other Components
Existing Substation
Proposed Eagle Eye Substation
Existing WAPA 230 kV Transmission Line
Existing CAWCD 115 kV Transmission Line
El Paso Natural Gas Pipeline
Proposed Gas Line Connection
US Route
Local Road
Railroad
Major Stream
Case No. 236 Certificated Corridor
Eagle Eye Solar Substation and BESS
Eagle Eye Energy Center Boundary
Township / Range Boundary
Jurisdictional Land Ownership
Bureau of Land Management Land
State Land
Private Land (No Shading)
0 0.25 0.5 0.75 1
Miles
ARIZONA
Parker
La Paz County
Map Extent
BRIGHTNIGHT
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT
Figure 1
Map Extent: La Paz County, Arizona
Date: 6.08.26
Author: sjw

Although the Applicant provides general information related to the overall Energy Center, including the Solar Facility, BESS, and non-jurisdictional Solar and Thermal Plant Substations herein for reference, these components are not under the jurisdiction of the ACC and therefore, not part of this request for a CEC. This CEC Application is requesting approval of the up to 700 MW Thermal Plant and the uncertificated portion of the Proposed Gen-Tie corridor, referred to herein as Proposed Gen-Tie Corridor. The Proposed Gen-Tie Corridor consists of the approximately 4.3-mile portion from the non-jurisdictional Thermal Plant Substation to the Certificated Case No. 236 Corridor (see **Figure 2**) and the up to 700 MW Thermal Plant facility.

The Applicant is a subsidiary of BNC DEVCO, LLC. BrightNight is the lead developer for the Project. BrightNight is a privately held independent power producer that develops, finances, constructs, and operates dispatchable energy power plants. BrightNight then sells and delivers the energy, capacity, other attributes and services, and/or the projects themselves to utilities, municipal load-serving entities, other electric retailers, and commercial and industrial customers in the United States. BrightNight's focus is to provide the highest value to their customers by first understanding their needs and then employing best-in-class engineering, technology, and commercial solutions. BrightNight has built a U.S. portfolio that is over 20+ gigawatts in size.

As required by Arizona Administrative Code R14-3-219, this Application is structured as follows:

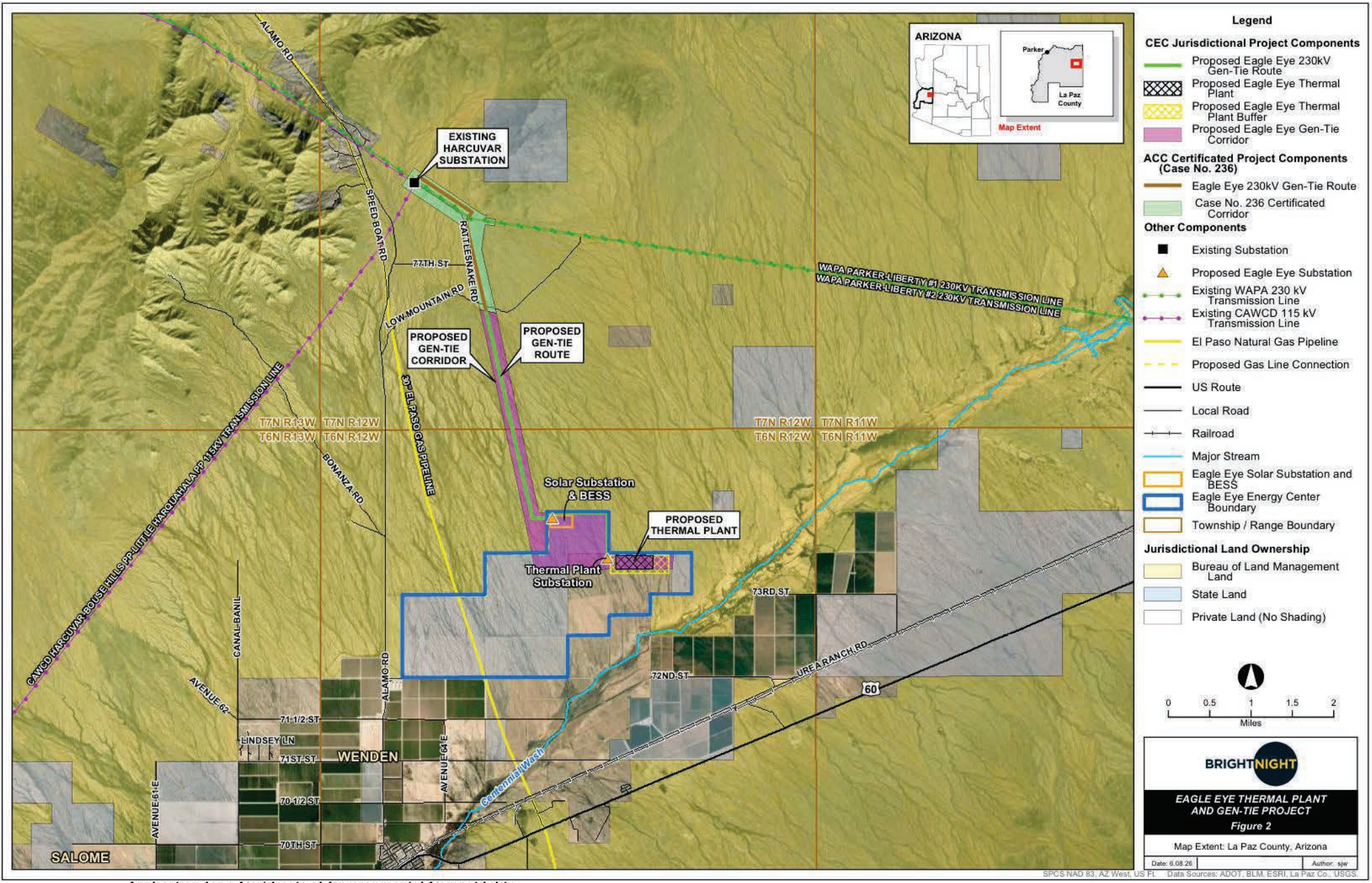
- Exhibit A – Project Location and Land Use
- Exhibit B – Environmental Studies
- Exhibit C – Areas of Biological Wealth
- Exhibit D – Biological Resources
- Exhibit E – Scenic Areas, Historic Sites and Structures, Archaeological Sites
- Exhibit F – Recreational Purposes and Aspects
- Exhibit G – Concepts of Typical Facilities
- Exhibit H – Existing Plans
- Exhibit I – Noise Emissions and Communication Interference
- Exhibit J – Special Factors

A list of abbreviations is provided following the Table of Contents.

Project Description

The Thermal Plant, as shown on **Figure 2**, is located on approximately 100 acres of undeveloped private land in unincorporated La Paz County, Arizona. The Thermal Plant will include up to 700 MWs of simple-cycle combustion turbine generators (CTGs) in a turbine yard.

The Proposed Gen-Tie Corridor, as shown on **Figure 2**, is located on private land, ASLD Land, and undeveloped BLM land within unincorporated La Paz County, Arizona. The Proposed Gen-Tie would exit the Thermal Plant Substation, which is located on private land, and travel within ASLD land along the northern border of the Energy Center to the Solar Substation. The majority of the Proposed Gen-Tie from the Solar Substation to the Certificated Case No. 236 Corridor would be located within BLM land.


ARIZONA
Parker
La Paz County
Map Extent
EXISTING HARCUVAR SUBSTATION
ALAMO RD
SPEED BOAT RD
RATTLESNAKE RD
77TH ST
LOW MOUNTAIN RD
PROPOSED GEN-TIE CORRIDOR
PROPOSED GEN-TIE ROUTE
WAPA PARKER-LIBERTY #1 230KV TRANSMISSION LINE
WAPA PARKER-LIBERTY #2 230KV TRANSMISSION LINE
30" EL PASO GAS PIPELINE
CAWCD HARCUVAR-BOUSE HILLS-PP-LITTLE HARQUAHALA PP 115KV TRANSMISSION LINE
T7N R13W T7N R12W
T6N R13W T6N R12W
T7N R12W T7N R11W
T6N R12W T6N R11W
BONANZA RD
Solar Substation & BESS
PROPOSED THERMAL PLANT
Thermal Plant Substation
73RD ST
72ND ST
UREA RANCH RD
60
CANAL-BANIL
AVENUE 62
ALAMO RD
71-1/2 ST
LINDSEY LN
71ST ST
WENDEN
AVENUE 64 E
AVENUE 61 E
70-1/2 ST
70TH ST
Centennial Wash
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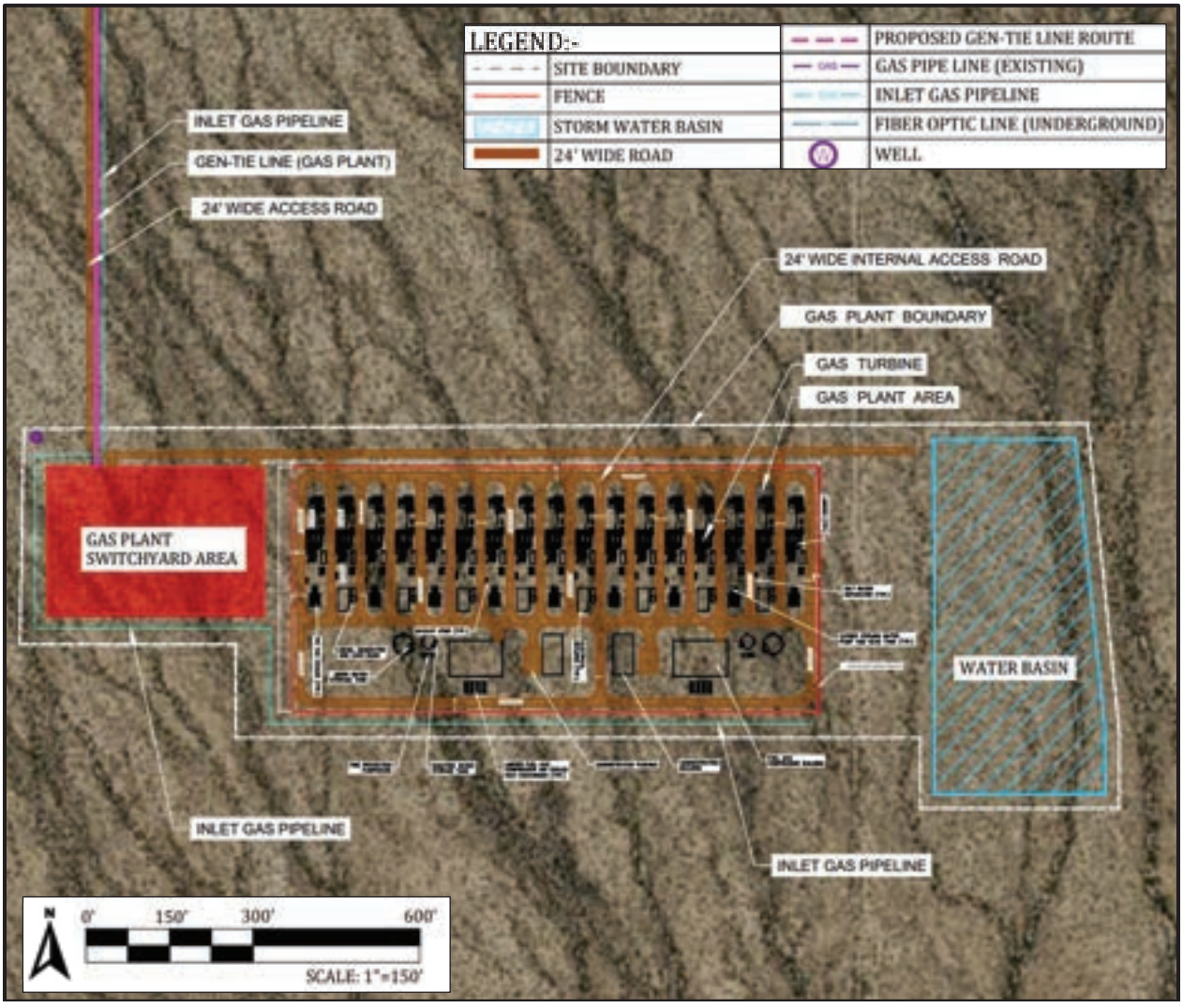
ACC Certificated Project Components (Case No. 236)
Eagle Eye 230kV Gen-Tie Route
Case No. 236 Certificated Corridor
Other Components
Existing Substation
Proposed Eagle Eye Substation
Existing WAPA 230 kV Transmission Line
Existing CAWCD 115 kV Transmission Line
El Paso Natural Gas Pipeline
Proposed Gas Line Connection
US Route
Local Road
Railroad
Major Stream
Eagle Eye Solar Substation and BESS
Eagle Eye Energy Center Boundary
Township / Range Boundary
Jurisdictional Land Ownership
Bureau of Land Management Land
State Land
Private Land (No Shading)
0 0.5 1 1.5 2
Miles
BRIGHTNIGHT
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT
Figure 2
Map Extent: La Paz County, Arizona
Date: 6.08.26
Author: sjw
SPCS NAD 83, AZ West, US Ft. Data Sources: ADOT, BLM, ESRI, La Paz Co., USGS.

The Gen-Tie would consist of a double circuit transmission line with two independent, three-phase electrical circuits (six conductors total, plus ground and communication wires) carried on the same tower structure. The nominal voltage of the Proposed Gen-Tie would be 230 kV. The Applicant requests a 1,000-foot Proposed Gen-Tie Corridor to allow flexibility to account for final engineering, and design (see **Figure 2)**. The Gen-Tie within the Certificated Case No. 236 Corridor would then connect to the existing Harcuvar Substation.

An overview map featuring the Project components and preliminary layout of the Thermal Plant is provided in **Figure 3** below.

Figure 3
Project Components and Preliminary Layout



Figures are for graphical depiction only and subject to change based on final engineering design.

Project Purpose and Need

The Applicant proposes to construct and operate the Proposed Gen-Tie to deliver electricity generated by the Thermal Plant and Solar Facility and BESS to local La Paz County electrical districts and/or other public power agencies and utilities in Arizona and the Southwest. The purpose of the Project is to co-locate thermal generation in a manner that allows the generating facilities to serve multiple purposes. The Project will provide much needed energy and capacity to the regional transmission system and will enhance resource adequacy capacity via quick response, dispatchable combustion turbine generators (CTGs). The ability to deploy the resource adequacy and related energy product attributes (frequency, regulations, non-spinning reserves) into the 230 kV system without additional, costly infrastructure, strategically positions the Project as a superior resource to complement long-term sustainability objectives.

Public Outreach Summary

The Applicant has implemented a robust outreach campaign and has proactively consulted with numerous stakeholders, including La Paz County, its Board of Supervisors, McMullen Valley Chamber of Commerce, Western Area Power Administration (WAPA), Native American consulting parties, natural resource agencies, local community groups and businesses, and property owners in the area. The following is a summary of the extensive public outreach timeline for the Project, as detailed in **Exhibit J**:

- The Applicant held meetings with the community related to the prior Eagle Eye Solar Project throughout 2024 and 2025, including public outreach related to Certificated CEC Case No. 236. These meetings included the following:
    - Community meeting held on May 16, 2024;
    - Dinner meeting with the McMullen Valley Chamber held on September 17, 2024;
    - Community meeting held on October 14, 2024;
    - Dinner meeting with the McMullen Valley Chamber held on August 19, 2025.

- As the Energy Center location was moved and with the addition of the Thermal Plant, the Applicant met with community leaders, agencies and members of the public to discuss the updated Project (now called the Eagle Eye Thermal Plant and Gen-Tie Project) in late 2025 and 2026.

- On December 17, 2025, the Applicant hosted a community meeting with the McMullen Valley Chamber to introduce the new Project site and addition of the Thermal Plant.

- On March 10, 2026, the Applicant sent a Project informational mailer to stakeholders and property owners within one mile of the Proposed Gen-Tie and Thermal Plant, with an additional mailing area to include the community of Wenden. The mailer included information about upcoming virtual and in-person open houses as well as a link to the Project website, a Project email address, and informational phone line. The virtual and in-person open houses were also noticed on the Project website and promoted to the local community through social media advertisements. Social media advertisements were created for the Eagle Eye Energy Center to notify the public of the open houses. Both

advertisements were geotargeted with zip codes that fell within a 2-mile buffer of the Project. The advertisements received thousands of clicks and interactions from the public.

- The Applicant hosted two virtual open houses on March 24, 2026, at 12:00 p.m. and 5:30 p.m., which included a presentation about the project, Q&A sessions with members of the public and stakeholder representatives.

- The Applicant hosted an in-person open house on March 25, 2026, from 4:30 p.m. to 6:30 p.m. at the Centennial Community Center and Library in Salome. The meeting was an open house/drop-in format where participants could view Project information boards and speak to Project team members and specialists.

- On April 14, 2026, the Applicant sent a second Project information mailer to stakeholders and property owners within one mile of the Project in the form of a Project newsletter. The Applicant also sent the mailer content via e-mail to individuals who had either requested e-mail information or registered for a virtual open house using their e-mail. The mailer and e-mail provided the same information about the Project, and information about the upcoming "Conversations with the Community" event, which allowed individuals to meet with Applicant representatives to discuss the Project and provide feedback. The Applicant also noticed the upcoming "Conversations with the Community" event on the Project website and to the local community through social media advertising. Social media advertisements were created for the Eagle Eye Energy Center to notify the public of the open houses. Both advertisements were geotargeted with zip codes that fell within a 2-mile buffer of the Project. The advertisements received thousands of clicks and interactions from the public.

- The Applicant hosted an in-person "Conversations with the Community" event at the Centennial Community Center and Library on April 29, 2026, from 1:00 p.m. to 4:00 p.m. BrightNight Project representatives met with community members in blocks of 20 minutes to discuss the Project, answer questions, and hear feedback. Participants could view Project information boards and speak to Project team members and specialists.

The Applicant has also posted Project updates on its website. Additional questions and/or comments that came into the website and the Project email were collected and questions were responded to via e-mail. Additional details related to the public outreach process are included in **Exhibit J.**

Summary of Environmental Compatibility

The Applicant conducted numerous studies to evaluate potential impacts associated with the Project on land use, biological resources, cultural and historical resources, aesthetic resources, air quality, recreation, noise and existing plans in the area. The results of these analyses are included in the Exhibits to this Application. Based on the results of these studies, this Project's broad base of public support, and the criteria in A.R.S §40-360.06, the Applicant respectfully submits that the Project will be environmentally compatible with the surrounding area. As described herein, the

Applicant has diligently identified and mitigated environmental impacts associated with the Project and will continue to pursue development of the Project in a responsible manner.

The following provides a summary of the environmental compatibility of the Project sought in this Application:

- No significant or detrimental effects would occur to wildlife, plant life, and associated forms of life upon which they are dependent.

- No significant or detrimental effects associated with noise emission levels and interference with communication signals would occur.

- The Project will be within permittable limits for air emissions and will measure and report actual emissions to demonstrate ongoing compliance with air permit conditions.

- The Project will seek to maximize the recycling of water for cooling of generation facilities in an effort to reduce water use.

- No significant or detrimental effects would occur to existing scenic areas, historic sites and structures, or archaeological sites at or in the vicinity of the Project.

- The Project would be environmentally compatible with the total environment of the area.

This CEC Application provides the information relevant to Arizona Administrative Code Rule R14-3-219 for the Project. The Applicant would develop the Project in a responsible manner and will minimize the environmental impacts associated with the Project. The Applicant therefore respectfully requests that the Committee grant, and the ACC approve, the CEC for the construction of the Project.

In accordance with Arizona Revised Statutes (A.R.S.) Sections 40-360.03 and 40-360.06 and Arizona Administrative Code R14-3-219, the Applicant provides the following information:

1. ***Name and address of the Applicant***

   Name: EAGL, LLC
   Address: 515 N. Flagler Drive, Ste. 250
   Inlet Beach, FL 33401

2. ***Name, address, and telephone number of a representative of the applicant who has access to technical knowledge and background information concerning this application, and who will be available to answer questions or furnish additional information***

   Name: Erik Ellis, Executive Vice President, BrightNight
   Address: 11201 N Tatum Blvd, Suite 300
   Phoenix, AZ 85029
   Telephone: 1-602-549-4243
   Email: erik@brightnightpower.com

3. ***State each date on which the applicant has filed a ten-year plan in compliance with A.R.S. § 40-360.02 and designate each such filing in which the facilities for which this application is made were described. If they have not been previously described in a ten-year plan, state the reasons therefore.***

   In accordance with A.R.S. Section 40-360.02(B), the Applicant filed a Ninety Day Plan with the Arizona Corporation Commission (ACC) on May 5, 2026. The Ninety Day Plan, which describes the Eagle Eye Thermal Plant and Gen-Tie Project (Project), can be found in Docket No. E-00000M-08-0170. In addition, EAGL, LLC filed a Ten-Year Plan describing a segment of the interconnection transmission line on January 31, 2026, and submitted an updated plan on May 5, 2026, in Docket E-99999A-25-0006.

4. ***Description of the proposed facility, including:***

   a. ***With respect to an electric generating plant:***

      i. ***Type of generating facilities (nuclear, hydro, fossil-fueled, etc.).***

         The Eagle Eye Energy Center (Energy Center) includes a simple-cycle power generation facility (Thermal Plant) that consists of combustion turbine generators (CTGs). Primary fuel will be natural gas, with Ultra Low Sulphur Diesel (ULSD) being considered as backup fuel, if required for facility reliability. The generation will supply power to the regional grid, providing electricity, regulation, ancillary service, and resource adequacy capacity products during periods of peak electricity demand.

ii. Number and size of proposed units.

The Thermal Plant will include up to 17 combustion turbine generators, with a maximum of 14 units in operation (3 redundant units) each with a nominal nameplate rating of 50 MW. Estimated net output at a high summer condition is approximately 600 MW, with a total nameplate capacity of approximately 700 MW.

Site Layout and Arrangement

Figure 3 in the Introduction depicts the proposed site layout and arrangement of the Thermal Plant. The layout shows the relative sizes and locations of the proposed equipment and facilities on the Thermal Plant site, including access roads, the gas meter station, the Gen-Tie originating from the Thermal Plant Substation, and sediment basins for storm water management.

The preliminary Thermal Plant site plan is approximately 50 acres, however, the Applicant requests approval for an approximately 100-acre siting area within the 2,558 acre Energy Center site to provide future design flexibility. A network of roads for fire equipment and maintenance access surrounds the generation equipment.

Combustion Turbine Equipment

Each CTG consists of an inlet air plenum and filters, evaporative cooling system, compressor, combustion system, power turbine, synchronous generator, exhaust ducting, emission controls, and exhaust stack with an estimated height of 70 ft.

All CTGs will meet Best Available Control Technology (BACT), which will include selective catalytic reduction (SCR) systems to reduce nitrogen oxide (NOx) emissions, as well as an oxidation catalyst to reduce carbon monoxide (CO) and volatile organic compounds (VOC) emissions.

CTGs performance can be augmented with evaporative inlet air cooling to improve plant performance when required.

Other auxiliary equipment that is required for each CTG package includes various fans, pumps, lube oil systems, fuel delivery system, hydraulic system, lighting, etc.

iii. The source and type of fuel to be utilized, including a proximate analysis of fossil fuels.

The Thermal Plant is expected to be supplied via a new dedicated natural gas pipeline lateral connecting the Thermal Plant to Kinder Morgan's El Paso Natural Gas (EPNG) interstate pipeline system, specifically the 30-inch diameter Havasu Crossover pipeline, located in the vicinity of the Energy Center Project site. If required for reliability needs, the Thermal Plant will also include dual fuel

capability via ULSD as a backup fuel, stored onsite and delivered by truck.

iv. Amount of fuel to be utilized daily, monthly, and yearly.

The Thermal Plant's operation will be variable and driven by many factors, including market and economic variables, weather, grid reliability and more. The Thermal Plant is designed to provide power to the grid as a peaking facility, and as such, it is expected to operate for a limited number of hours to help meet Arizona's peak demand, balancing energy from the variable renewable resources, when needed for reliability, or other events impacting the grid. The Thermal Plant could also be called upon in unexpected longer duration events, such as outages of other generators. There are many variables that can impact operation of the facility including supply vs demand, various system operating conditions, renewable generation and variability, and more (see **Table 1**).

Table 1
Estimated Thermal Plant Natural Gas Consumption

Duration	Expected Case: 10% Capacity Factor[1]	Theoretical Maximum Case: 100% Capacity Factor[1]
Daily	15,500	155,000
Monthly	465,000	4,645,000
Annual	5,652,000	56,518,000

Notes:
1. Estimated values are in MBtu HHV and based on ISO conditions at site elevation.

v. Type of cooling to be utilized and source of any water to be utilized.

The Thermal Plant is a simple-cycle generation facility, which does not require the large heat rejection systems required of combined cycle power generation. The Thermal Plant is being designed to minimize water consumption, and the planned CTGs will have dry low NOx combustion systems, which do not require water for NOx emissions control. The expected water users for the Thermal Plant include general plant service water, fire protection water, potable water for staff, and CTG evaporative coolers. Evaporative coolers are only planned to be used to enhance Thermal Plant performance during peak period conditions and are used for reducing inlet air temperature to maximize the peak-condition output of the plant thereby improving overall performance.

Type of Cooling

The air inlet plenum of each CTG will include evaporative coolers, for use during peak periods, to reduce the compressor inlet temperature, which enhances performance of the Thermal Plant. The generators that are part of each

CTG package are planned to be dry cooled.

Water Use Requirements

As stated above, the Thermal Plant is designed to minimize water consumption, with expected water users for general plant service water, fire protection water, potable water for staff, and CTG evaporative coolers. Approximately 10 acre-feet per year is needed to support Thermal Plant operations at full buildout.

Source of Water

Water would be sourced from a non-potable well within the Energy Center site, sourced from a local municipal water provider via a newly constructed water pipeline, or trucked in from an offsite water purveyor.

vi. Proposed height of stacks and number of stacks, if any.

There will be up to 17 exhaust stacks, one for each CTG. Each stack is estimated to be 70 feet in height.

vii. Dates for scheduled start-up and firm operation of each unit and date construction must commence in order to meet schedules.

The Project could begin operations as early as the first quarter of 2029 with the first CT unit coming on-line. Additional CTs will go on-line incrementally through fourth quarter of 2030. The Project will operate year-round, as needed by load serving entities in Arizona.

Construction of the Project could begin as early as third quarter of 2027 to meet the commercial operation dates and planned startup schedule.

viii. To the extent available, the estimated costs of the proposed facilities and site, stated separately. (If application contains alternative sites, furnish an estimate for each site and a brief description of the reasons for any variations in estimates.)

The estimated cost for development and construction of the Thermal Plant is approximately $3 billion. The cost of the Thermal Plant site is approximately $468,750.

ix. Legal description of proposed site. (If application contains alternative sites, list sites in order of applicant's preference with a summary of reasons for such order or preference and any changes such alternative sites would require in the plans reflected in (i) through (viii) hereof.)

The Thermal Plant will be located on an approximately 100-acre site in Section 10, Township 6 North, Range 12 West, of the Gila and Salt River Base and Meridian in La Paz County, Arizona.

b. With respect to a proposed transmission line:

i. Nominal voltage for which the line is designed; description of the proposed structures and switchyards or substations associated therewith; and purpose for constructing said transmission line

Nominal Voltage

The nominal voltage of the Proposed Gen-Tie is 230 kV.

Proposed Structures and Substation

The Proposed Gen-Tie would consist of a double circuit transmission line with two independent, three-phase electrical circuits (six conductors total, plus ground wires) carried on the same tower structure. The structures are expected to have a typical height of approximately 120 to 150 feet and the maximum height of the structures would not exceed 199 feet. The Gen-Tie line would originate at the new non-jurisdictional Thermal Plant Substation and connect to the Certificated Case No. 236 Gen-Tie Corridor, which then connects to the existing Harcuvar Substation.

Conceptual drawings of the pole types and anticipated structures that will be used in the Project are included in **Exhibit G.**

Purpose for Constructing the Gen-Tie

The purpose of the Proposed Gen-Tie will be to deliver power from the proposed Thermal Plant and non-jurisdictional Solar Facility to the regional transmission grid for customer use. The Project will provide Arizona and the broader Southwest with new clean, renewable energy resources.

ii. Description of geographical points between which the transmission line will run the straight-line distance between such points and the length of the transmission line for each alternative route for which the application is made.

Geographical Points

The Proposed Gen-Tie Corridor would span from Latitude 33°52'38.36" North, Longitude 113°29'52.94" West to Latitude 33°55'30.66" North, 113°31'32.74" West. The total Gen-Tie from the Thermal Plant Substation to the Harcuvar Substation would span from Latitude 33°52'38.36" North, Longitude 113°29'52.94" West to Latitude 33°56'32.34" North, Longitude 113°32'15.99" West.

The Project Gen-Tie Corridor would originate at the new, non-jurisdictional Thermal Plant Substation and terminate at the Certificated Case No. 236 Corridor. The Proposed Gen-Tie Corridor commences in Section 9 of Township 6 North and Range 12 West, and terminates in Section 29 of Township 7 North

and Range 12 West.

Straight-line Distance Between Such Points

The straight-line distance of the Proposed Gen-Tie from the Thermal Plant Substation to the Certificated Case No. 236 Corridor is approximately 3.3 miles.

The Proposed Gen-Tie is approximately 4.3 miles from the Thermal Plant to the Certificated Case No. 236 Corridor. The full Gen-Tie from the Thermal Plant Substation to the POI is 6.1 miles.

There are no alternative routes proposed for the Project Gen-Tie.

Length of the Transmission Line for Each Alternative Route

Not applicable.

iii. Nominal width of right-of-way required, nominal length of spans, maximum height of supporting structures and minimum height of conductor above ground.

Nominal Width of Right-of-Way Required

The Gen-Tie will require a 150-ft right-of-way (ROW), within a requested variable width corridor for the entirety of the transmission line alignment. The 1,000-foot corridor is being requested to allow for minor adjustments to the location of structures to achieve site-specific mitigation objectives or meet site-specific engineering requirements.

Nominal Length of Spans

The typical span length between structures will vary depending on terrain, constraints, and other factors. The proposed span lengths range from 73 feet to 1,255 feet apart, which is subject to change pending detailed design. The conductors will have a non-specular finish to reduce visibility. Variations on structure types may be required to achieve site-specific mitigation objectives, meet site-specific engineering requirements, and/or based on availability at the time of procurement.

Maximum Height of Supporting Structures

Typical structure height is between 120 feet and 150 feet and the maximum height of the structures would not exceed 199 feet.

Minimum Height of Conductor Above Ground:

The minimum height of conductor above the existing grade will be 23 feet at maximum operating temperature.

iv. To the extent available, the estimated costs of proposed transmission line and route, stated separately. (If application contains alternative routes, furnish an estimate for each route and a brief description of the reasons for any variations in such estimates.)

The transmission line cost is approximately $8.7 million, which includes the

costs for the poles, wires, and installation. Bureau of Land Management (BLM) ROW lease payment for the proposed route is estimated at approximately $4,000 per year, which includes the costs for securing the necessary easements along the transmission alignment.

v. ***Description of proposed route and switchyard locations. (If application contains alternative routes, list routes in order of applicant's preference with a summary of reasons for such order of preference and any changes such alternative routes would require in the plans reflected in (i) through (iv) hereof.)***

The Proposed Gen-Tie Corridor will originate at the Project Thermal Plant Substation in the northern area of the Eagle Eye Energy Center boundary and route north and northwest to the Certificated Case No. 236 Corridor, as shown in **Figure 2** in the Introduction.

vi. ***For each alternative route for which application is made, list the ownership percentages of land traversed by the entire route (federal, state, Indian, private, etc.).***

No alternative routes have been identified.

5. ***List the areas of jurisdiction [as defined in A.R.S. § 40-360(1)] affected by each alternative site or route and designate those proposed sites or routes, if any, which are contrary to the zoning ordinances or master plans of any of such areas of jurisdiction.***

The Eagle Eye Energy Center is located within unincorporated La Paz County on Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land) and private land. The Project Thermal Plant is located on private land, and the non-jurisdictional Project Solar Facility is located on ASLD and private land. The Project Gen-Tie originates on private land, travels through ASLD land within the Eagle Eye Energy Center boundary, and the majority is located on BLM land.

The Applicant recently received approval for a Minor Comprehensive Plan Amendment (MCPA) and Conditional Use Permit (CUP) from La Paz County in order to accommodate the development of the Project.

6. ***Describe any environmental studies applicant has performed or caused to be performed in connection with this application or intends to perform or cause to be performed in such connection, including the contemplated date of completion.***

The Applicant has evaluated available secondary and field data related to air quality, water resources, biological resources, visual resources, cultural resources, recreational resources, land use, noise levels, and communication signals in order to assess the potential impacts that may result from the construction, operation, and maintenance of the Project. These evaluations are included in Exhibits A, B, C, D, E, F, H, and I to this Application.

Based on the information provided herein, the Applicant hereby affirms, upon thorough expert

scientific environmental evaluation and analysis, that the Project is environmentally compatible and respectfully requests the Arizona Power Plant and Transmission Line Siting Committee issue a CEC, with a term of 10 years.

By: 

David Gil
Authorized Representative
EAGL, LLC

ORIGINAL and 8 copies of the foregoing hand delivered and filed with the Arizona Corporation Commission, this 16th of June, 2026.

EXHIBIT A
PROJECT LOCATION AND LAND USE

In accordance with Arizona Administrative Code Rules of Practice and Procedure R14-3-219, the Applicant provides the following location maps and land use information:

Where commercially available, a topographic map, 1:250,000 scale, showing the proposed plant site and the adjacent area within 20 miles thereof. If application is made for alternative plant sites, all sites may be shown on the same map, if practicable, designated by applicant's order of preference.

Where commercially available, a topographic map, 1:62,500 scale, of the proposed plant site, showing the area within 2 miles thereof. The general land use plan within this area shall be shown on the map, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay.

Where commercially available, 1) a topographic map, 1:250,000 scale, showing any proposed transmission line route longer than 50 miles and the adjacent area; and 2) a topographic map, a scale of 1:62,500, for routes shorter than 50 miles showing any proposed transmission line route and the adjacent area.

Where commercially available, a topographic map,1:62,500 scale, of each proposed transmission line route longer than 50 miles showing that portion of the route within two miles of any subdivided area. The general land use plan within the area shall be shown on a 1:62,500 map required for Exhibit A-3, and for the map required by this Exhibit A-4, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay.

Figure A-1*, Jurisdiction* illustrates the Eagle Eye Thermal Plant and Gen-Tie Project (Project) site within a 20-mile area on a topographic map at a 1:250,000 scale.

Figure A-2, *Jurisdiction* illustrates the land ownership and surface jurisdiction for the location of Project facilities and land within 2 miles of the Project (1:62,500 scale).

Figure A-3, *La Paz County Approved Future Land Use*, illustrates County approved future land uses within 2 miles of the Project (1:62,500 scale).

Figure A-4, *La Paz County Approved Zoning*, illustrates approved County zoning designations within 2 miles of the Project (1:62,500 scale).

Project Location

The Thermal Plant is located on private land, and the Proposed Gen-Tie is located on a mix of Bureau of Land Management (BLM) land, Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land), and private land in unincorporated La Paz County, Arizona;

approximately 2 miles north of the unincorporated community of Wenden. **Figures A-1** and **A-2** depict the regional area and, specifically, the location of the Project and the municipal jurisdiction boundaries within 2 miles.

Existing land uses around the Project generally include agricultural, open space, residential, and public and semi-public land. The Energy Center site is approximately 2,558 acres and consists of undeveloped land.

Major transportation corridors in the Project vicinity include United States Highway 60, located approximately 1.7 miles south of the Project site, Urea Ranch Road located approximately 1.3 miles south of the Project site, and Alamo Road, which is located approximately 0.2 miles west of the Project site. Genesee and Wyoming, Inc. Arizona and California Railroad is located approximately 1.3 miles south of the Energy Center.

Inventory

The Applicant consultant completed a land use inventory to identify and map existing and designated land uses within 2 miles of the Project. Methods for the land use inventory included a desktop analysis, including review of available land use plans, aerial imagery, data from La Paz County, and other supporting documents. The land use inventory also included outreach and communication with government agencies, municipalities, and other stakeholders to gather information regarding future development plans or known development projects.

Jurisdictions/Land Ownership

The Project is located entirely in unincorporated La Paz County on private, ASLD, and BLM land. As depicted on **Figure A-1**, the Proposed Gen-Tie is located on private, ASLD, and BLM land, and the proposed Thermal Plant is located on private land within unincorporated La Paz County. None of the Project components are located within 2 miles of an incorporated city or town; however, the Project is approximately 2 miles northeast of the unincorporated community of Wenden.

A portion of the Project is located on state land controlled through leases with the ASLD. This portion of the Project would require a lease agreement from the ASLD, which would be obtained following approval of this Certificate of Environmental Compatibility (CEC).

Land Use and Zoning

The Project is located entirely in unincorporated La Paz County. Land use and zoning information was gathered from La Paz County. The following summarizes the La Paz County's land use and zoning within 2 miles of the Project. This discussion includes the land use and zoning designations reflected in the most current version of the La Paz County 2035 Comprehensive Plan (approved on August 18, 2025); and on June 1, 2026 La Paz County Board of Supervisors approved a Minor Comprehensive Plan Amendment (CPA) that changed the future land use designation of the site from Low Density Residential and agriculture to Rail/Heavy Industry, and the approval of a Conditional Use Permit (CUP) to allow utilities within the current La Paz County zoning designation for Rural Agriculture.

La Paz County

The Project is located in unincorporated eastern La Paz County. **Figure A-2** depicts all jurisdictions within 2 miles of the Project. La Paz County is located in west-central Arizona and encompasses approximately 4,497 square miles. According to U.S. Census Bureau data, the estimated 2020 population of La Paz County is 16,557.

Land use controls for private land within unincorporated portions of La Paz County are regulated by the *La Paz County 2035 Comprehensive Plan* (La Paz County Comprehensive Plan). This Comprehensive Plan is a response to the need for a clear, balanced approach to growth that protects the County's unique scenic landscapes, local character, and quality of life (La Paz, 2025).

La Paz Land Use

The existing land use data was acquired for the Project area via aerial interpretation and a site visit conducted on March 25, 2026. The existing land use within the Project boundary consists of vacant, undeveloped land. The existing land uses within 2 miles of the Project include rural residential, open space, recreational vehicle parks, a church, utility infrastructure, railroad infrastructure, and agriculture uses.

Land use planning information for the area was gathered from La Paz County. A portion of the Project is located on ASLD land. The ASLD defers to local and county community development in regards to planning and zoning regulations on state trust lands.

As shown on **Figure A-3**, the approved future land use designations within 2 miles of the Project include: Agriculture, Low Density Residential, Rail/Heavy Industry, and Open Space and Parks. These land use designations are defined by the La Paz County Comprehensive Plan as follows:

- Low Density Residential use is designated for traditional large-lot, single-family detached homes and low-density residential development to preserve the rural character.

- Agriculture use is designated for the continuation of agricultural and related functions, where such areas should not be intensified or developed by 2035 unless deemed appropriate. Storage and use of farm implements, equipment, agritourism, and agricultural product retail sales such as farmers markets are allowed. Water-efficient agricultural practices and crops are strongly encouraged to conserve limited water resources. This may include drought-resistant crop varieties, precision irrigation systems, soil moisture monitoring, mulching, and other water conservation techniques. The use of reclaimed water and rainwater harvesting is also promoted where it is feasible to reduce reliance on groundwater and surface water supplies.

- Rail/Heavy Industry use is designated for the most intensive and heaviest industrial uses, such as manufacturing, processing, fabrication, and large warehousing operations. These uses should be strategically located near the railroad and highway, with appropriate transitioning or buffering to protect nearby uses to minimize light, noise, odor, vibration, traffic, water, wastewater, and other utility impacts.

- Open Space and Parks use is designated for local trails, parks, wildlife corridors, Bureau of

Land Management areas, nature centers, recreation areas, rivers, streams, floodways, floodplains, outdoor shooting/archery ranges, and other uses to promote active communities and tourism while having minimal impact to the environment and preserving and conserving public/private open space.

The Proposed Gen-Tie is located in an area where the County has a future land use designation of Open Space and Parks. The proposed Thermal Plant was located within the La Paz County's 2035 Comprehensive Plan Future Land Use designation of Low Density Residential. The Applicant processed a Minor CPA with the County to change the future land use designation for the Thermal Plant from Low Density Residential to Rail/Heavy Industry, as Shown in **Figure A-3**. The Rail/Heavy Industry land use is defined in the La Paz County Comprehensive Plan as supporting intensive and heavy industrial uses, such as manufacturing, processing, fabrication, and large warehousing operations. These uses should be strategically located near the railroad and highway, with appropriate transitioning or buffering to protect nearby uses to minimize light, noise, odor, vibration, traffic, water, wastewater, and other utility impacts.

The purpose of the Rail/Heavy Industry designation is to ensure that future development is compatible with industrial operations associated with energy utilities. The La Paz County Board of Supervisors approved the minor CPA on June 1, 2026. Therefore, the Project is compatible with the approved future land use designation for the development of the Project.

La Paz Zoning

La Paz County zoning is governed by the La Paz County Zoning Regulations, adopted in December 2021 and effective as of January 5, 2012. The Project site has a zoning designation of Rural Agriculture (RA). The designated La Paz County zoning district within 2 miles of the Project is Rural Agriculture (RA-40). This County zoning designations is defined as follows:

- The Rural Agriculture (RA) Zoning District is intended to apply to rural areas, on large parcels, for permanent dwellings with agricultural uses and to support agricultural and open space uses.

The proposed Thermal Plant site is currently zoned for Rural Agriculture (RA). Per the La Paz County RA Zoning Regulations, public and commercial utility buildings and facilities needed to serve surrounding territory are allowed in the RA zone with the approval of a CUP. An application for approval of a CUP was filed with La Paz County and was approved by the Board of Supervisors on June 1, 2026; refer to **Figure A-4**. Therefore, the Project is compatible with the County's zoning designation.

BLM Resource Management Plan

The Proposed Gen-Tie line is located within the plan areas of the following BLM area plans: Lake Havasu Resource Management Plan (RMP) (BLM 2007), and the Approved Amendment to the Lower Gila North Management Framework Plan and the Lower Gila South Resource Management Plan and Decision Record (2005). According to the Lake Havasu RMP, the Project site is located along an existing utility corridor. Per the Lake Havasu HMP Lands and Reality policy LR-14, In utility corridors, uses including but not limited to transportation, pipelines, and electrical

transmission lines will be allowed when the uses are compatible. These designated corridors apply only to BLM-administered lands. In addition, the Amendment to the Lower Gila North Management Framework Plan and the Lower Gila South Resource Management Plan and Decision Record identifies the Project as being outside of any designated Management and/or Wilderness areas. The Applicant is in the process of obtaining a BLM Right-of-Way (ROW) for the Proposed Gen-Tie corridor.

Potential Effects

Jurisdiction and Land Ownership

The Project is located in unincorporated La Paz County on private, ASLD, and BLM land. For the portion of the Project on State land, the Applicant would need to sign a lease agreement with ASLD prior to Project construction. The portion of the Project located on federal land, would need an approved ROW permit from the BLM prior to construction.

Existing Land Use

The Project site is currently vacant, undeveloped land. A change to the County's Comprehensive Plan designated future land use of the Project site was recently approved by the County Board of Supervisors on June 1, 2026. The approved future land use designation for the site is Rail/Heavy Industry. The Project is located near existing utilities including overhead transmission lines and substations, and an underground gas pipeline; which are consistent with the Project's proposed industrial-energy generation uses. Therefore, the Project would result in negligible impacts to existing land use plans.

Future Land Use

A change to the County's Comprehensive Plan future land use designation for the Project site was recently approved by the County Board of Supervisors on June 1, 2026. The currently approved future land use designation for the site is Rail/Heavy Industry; therefore, the Project will be compatible with the land use designation.

Zoning

The Project site is currently zoned for Rural Agriculture (RA). The Project is compatible with the RA zoning district with the approval of a CUP. An application for approval of a CUP was filed with La Paz County and was approved by the County's Board of Supervisors on June 1, 2026. Therefore, the Project is compatible with the RA zoning designation.

Conclusion

As stated above, the Project is located on private, ASLD, and BLM land in unincorporated La Paz County. The Project is compatible with the approved County future land use as well as the existing zoning district. The Project is also compatible with the BLMs Lake Havasu RMP and Lower Gila North Management Framework Plan and the Lower Gila South RMP and Decision Record land use policies. Therefore, the Project is consistent with applicable land use and zoning regulations.

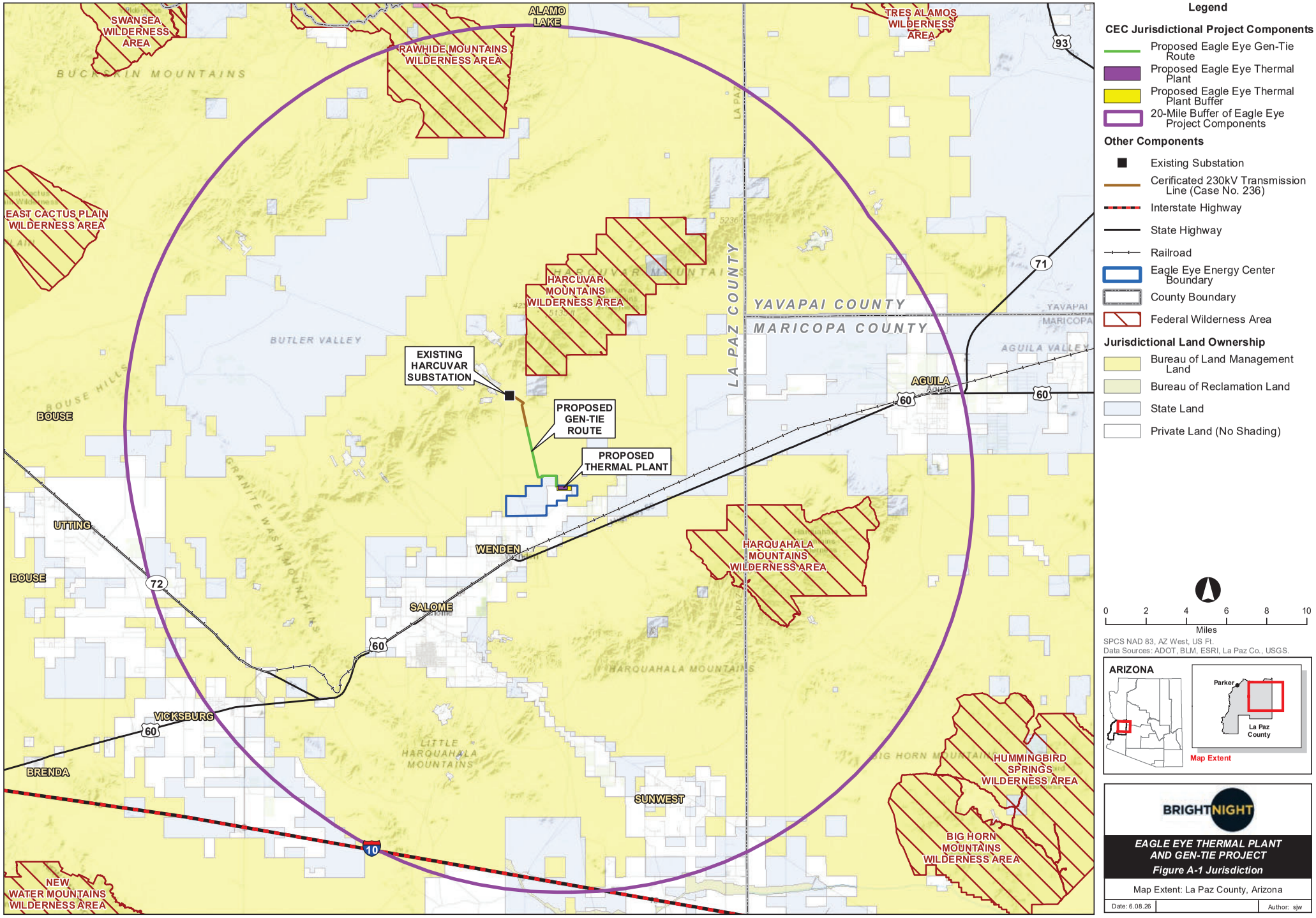
References

United States Department of the Interior Bureau of Land Management (BLM). 2007. Record of Decision and Lake Havasu Field Office Approved Resource Management Plan. May.

BLM. 2005. Approved Amendment to the Lower Gila North Management Framework Plan and the Lower Gila South Resource Management Plan and Decision Record. Phoenix Field Office. July.

La Paz County. 2025. La Paz County 2035 Comprehensive Plan. Accessed April 2026. Available at: https://www.lapaz.gov/DocumentCenter/View/9301/La-Paz-Comprehensive-Plan-2025-08-17-VGB?bidId=

U.S. Census Bureau. 2020 Decennial Census La Paz County Total Population. Accessed April 2026. Available at: https://data.census.gov/profile/City,VS?g=050XX00US04012#populations-and-people



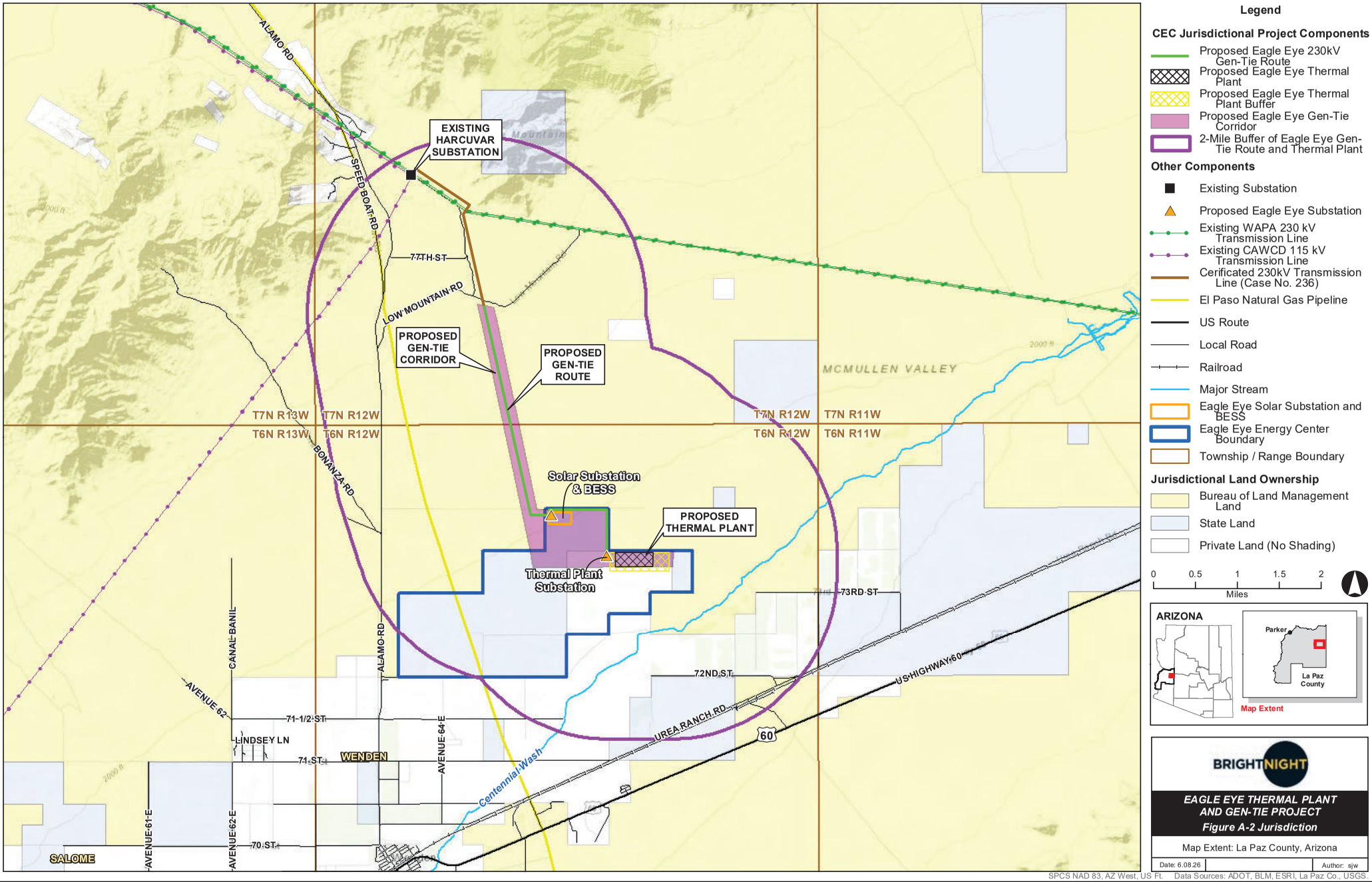
BRIGHTNIGHT

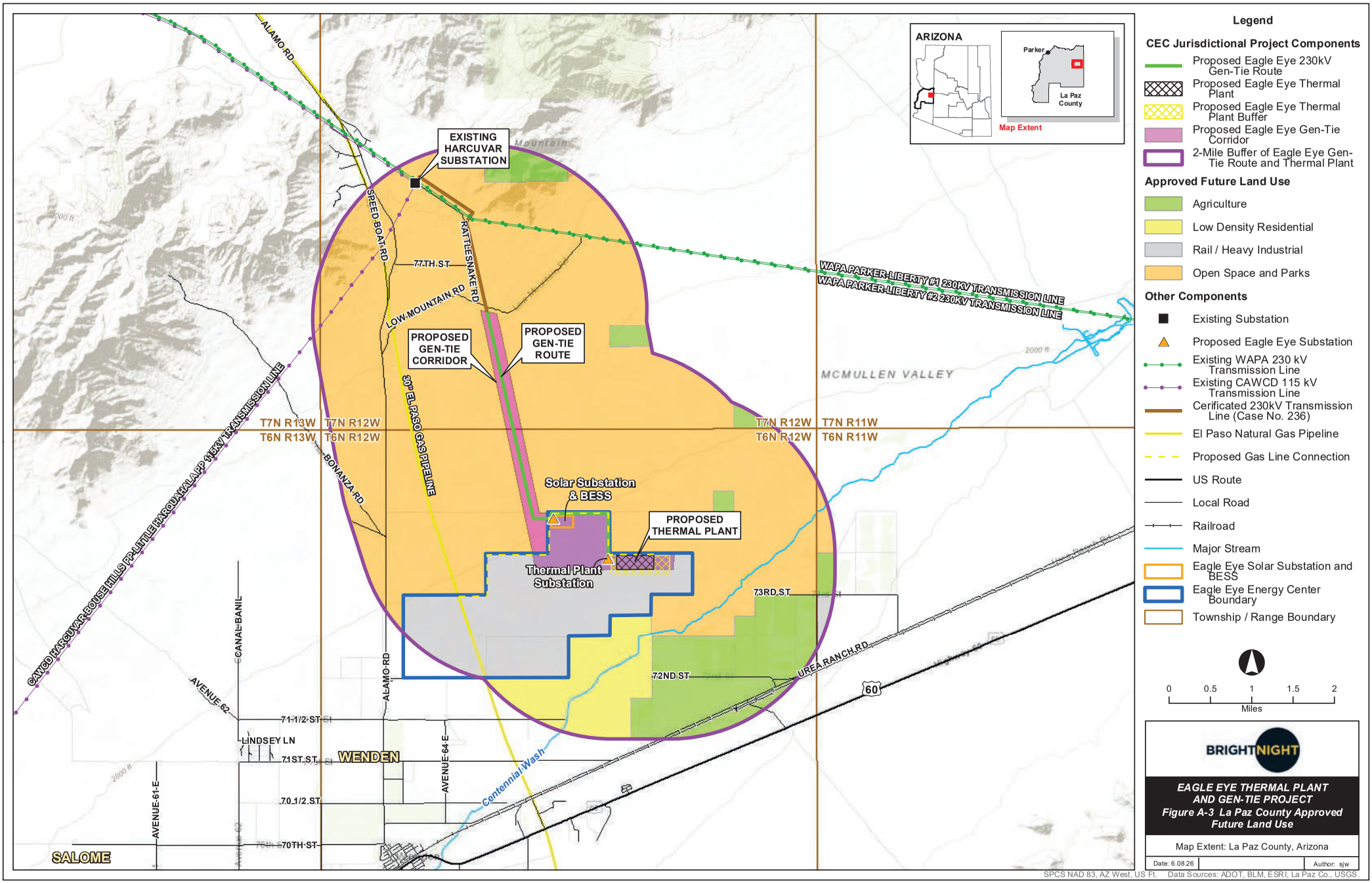
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT

Figure A-1 Jurisdiction

Map Extent: La Paz County, Arizona

Date: 6.08.26		Author: sjw


EXISTING HARCUVAR SUBSTATION
PROPOSED GEN-TIE CORRIDOR
PROPOSED GEN-TIE ROUTE
Solar Substation & BESS
PROPOSED THERMAL PLANT
Thermal Plant Substation
ALAMO RD
SPEED BOAT RD
77TH ST
LOW MOUNTAIN RD
BONANZA RD
MCMULLEN VALLEY
T7N R13W
T7N R12W
T7N R12W
T7N R11W
T6N R13W
T6N R12W
T6N R12W
T6N R11W
73RD ST
72ND ST
US HIGHWAY 60
UREA RANCH RD
60
CANAL BANIL
AVENUE 62
71-1/2 ST
LINDSEY LN
71 ST
WENDEN
AVENUE 64 E
Centennial Wash
AVENUE 61 E
AVENUE 62 E
70 ST
SALOME
Legend
CEC Jurisdictional Project Components
Proposed Eagle Eye 230kV Gen-Tie Route
Proposed Eagle Eye Thermal Plant
Proposed Eagle Eye Thermal Plant Buffer
Proposed Eagle Eye Gen-Tie Corridor
2-Mile Buffer of Eagle Eye Gen-Tie Route and Thermal Plant
Other Components
Existing Substation
Proposed Eagle Eye Substation
Existing WAPA 230 kV Transmission Line
Existing CAWCD 115 kV Transmission Line
Cerificated 230kV Transmission Line (Case No. 236)
El Paso Natural Gas Pipeline
US Route
Local Road
Railroad
Major Stream
Eagle Eye Solar Substation and BESS
Eagle Eye Energy Center Boundary
Township / Range Boundary
Jurisdictional Land Ownership
Bureau of Land Management Land
State Land
Private Land (No Shading)
0 0.5 1 1.5 2
Miles
ARIZONA
Parker
La Paz County
Map Extent
BRIGHTNIGHT
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT
Figure A-2 Jurisdiction
Map Extent: La Paz County, Arizona
Date: 6.08.26
Author: sjw
SPCS NAD 83, AZ West, US Ft. Data Sources: ADOT, BLM, ESRI, La Paz Co., USGS.


EXISTING HARCUVAR SUBSTATION
PROPOSED GEN-TIE CORRIDOR
PROPOSED GEN-TIE ROUTE
Solar Substation & BESS
PROPOSED THERMAL PLANT
Thermal Plant Substation
WAPA PARKER-LIBERTY #1 230KV TRANSMISSION LINE
WAPA PARKER-LIBERTY #2 230KV TRANSMISSION LINE
CAWCD HARQUAHALA PP-LITTLE HARQUAHALA PP 115KV TL TRANSMISSION LINE
30" EL PASO GAS PIPELINE
ALAMO RD
SPEED BOAT RD
RATTLESNAKE RD
77TH ST
LOW MOUNTAIN RD
BONANZA RD
73RD ST
72ND ST
UREA RANCH RD
60
CANAL-BANIL
AVENUE 62
71-1/2 ST
LINDSEY LN
71ST ST
70-1/2 ST
70TH ST
AVENUE 61-E
AVENUE 64-E
WENDEN
SALOME
Centennial Wash
MCMULLEN VALLEY
T7N R13W
T6N R13W
T7N R12W
T6N R12W
T7N R12W
T6N R12W
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Proposed Eagle Eye 230kV Gen-Tie Route
Proposed Eagle Eye Thermal Plant
Proposed Eagle Eye Thermal Plant Buffer
Proposed Eagle Eye Gen-Tie Corridor
2-Mile Buffer of Eagle Eye Gen-Tie Route and Thermal Plant
Approved Future Land Use
Agriculture
Low Density Residential
Rail / Heavy Industrial
Open Space and Parks
Other Components
Existing Substation
Proposed Eagle Eye Substation
Existing WAPA 230 kV Transmission Line
Existing CAWCD 115 kV Transmission Line
Cerificated 230kV Transmission Line (Case No. 236)
El Paso Natural Gas Pipeline
Proposed Gas Line Connection
US Route
Local Road
Railroad
Major Stream
Eagle Eye Solar Substation and BESS
Eagle Eye Energy Center Boundary
Township / Range Boundary
0 0.5 1 1.5 2
Miles
BRIGHTNIGHT
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT
Figure A-3 La Paz County Approved Future Land Use
Map Extent: La Paz County, Arizona
Date: 6.08.26
Author: sjw
SPCS NAD 83, AZ West, US Ft. Data Sources: ADOT, BLM, ESRI, La Paz Co., USGS.

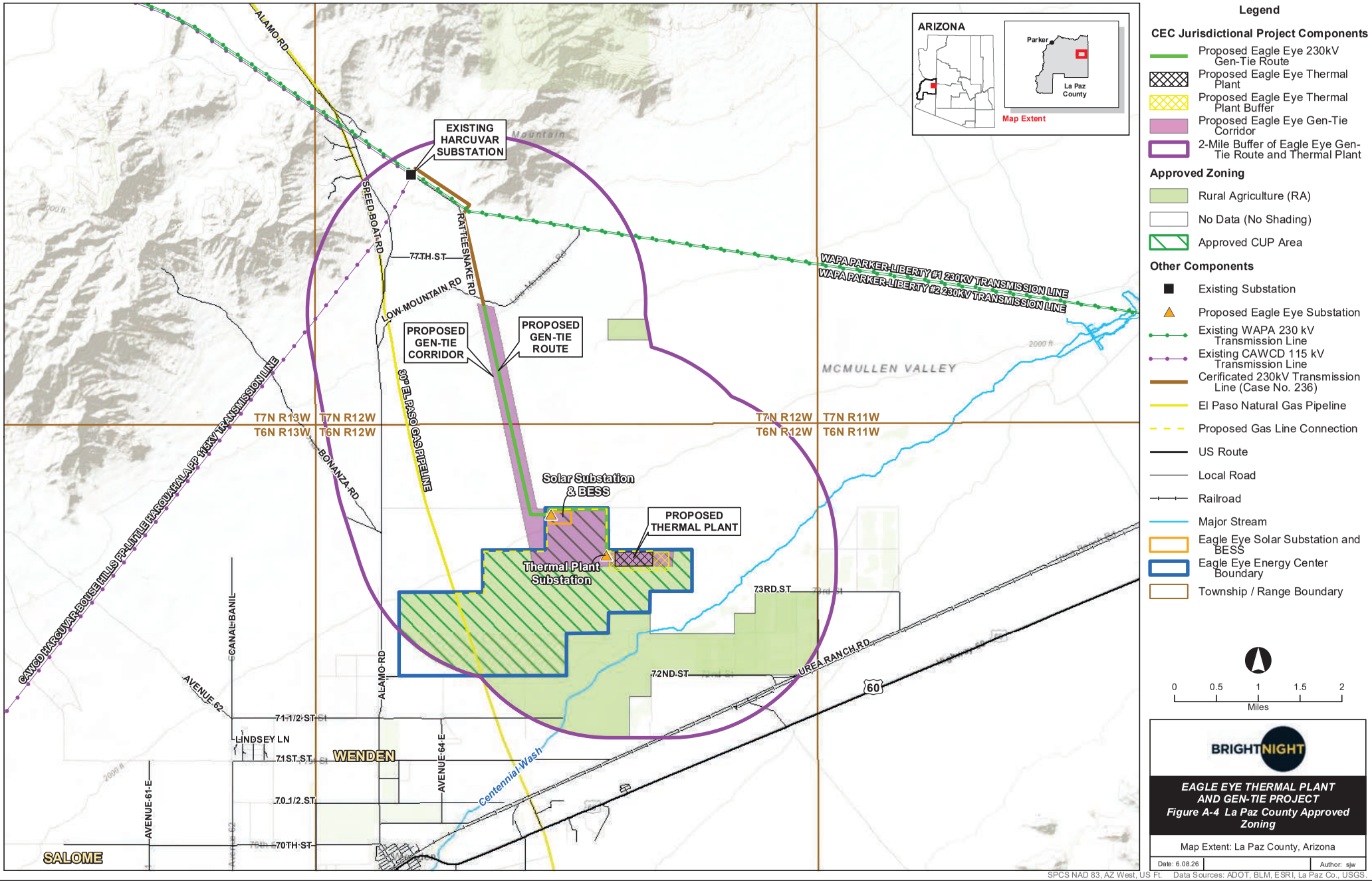
ARIZONA
Parker
La Paz County
Map Extent
EXISTING HARCUVAR SUBSTATION
PROPOSED GEN-TIE CORRIDOR
PROPOSED GEN-TIE ROUTE
Solar Substation & BESS
PROPOSED THERMAL PLANT
Thermal Plant Substation
WAPA PARKER-LIBERTY #1 230KV TRANSMISSION LINE
WAPA PARKER-LIBERTY #2 230KV TRANSMISSION LINE
CAWCD HARQUAHALA PP-LITTLE HARQUAHALA PP 115KV TL TRANSMISSION LINE
EL PASO GAS PIPELINE
ALAMO RD
SPEED BOAT RD
RATTLESNAKE RD
LOW MOUNTAIN RD
BONANZA RD
77TH ST
73RD ST
72ND ST
71 1/2 ST
71ST ST
70 1/2 ST
70TH ST
LINDSEY LN
AVENUE 62
AVENUE 61 E
AVENUE 64 E
CANAL BANIL
UREA RANCH RD
60
MCMULLEN VALLEY
WENDEN
SALOME
Centennial Wash
T7N R13W
T6N R13W
T7N R12W
T6N R12W
T7N R12W
T6N R12W
T7N R11W
T6N R11W
Legend
CEC Jurisdictional Project Components
Proposed Eagle Eye 230kV Gen-Tie Route
Proposed Eagle Eye Thermal Plant
Proposed Eagle Eye Thermal Plant Buffer
Proposed Eagle Eye Gen-Tie Corridor
2-Mile Buffer of Eagle Eye Gen-Tie Route and Thermal Plant
Approved Zoning
Rural Agriculture (RA)
No Data (No Shading)
Approved CUP Area
Other Components
Existing Substation
Proposed Eagle Eye Substation
Existing WAPA 230 kV Transmission Line
Existing CAWCD 115 kV Transmission Line
Cerificated 230kV Transmission Line (Case No. 236)
El Paso Natural Gas Pipeline
Proposed Gas Line Connection
US Route
Local Road
Railroad
Major Stream
Eagle Eye Solar Substation and BESS
Eagle Eye Energy Center Boundary
Township / Range Boundary
0 0.5 1 1.5 2
Miles
BRIGHTNIGHT
EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT
Figure A-4 La Paz County Approved Zoning
Map Extent: La Paz County, Arizona
Date: 6.08.26
Author: sjw
SPCS NAD 83, AZ West, US Ft. Data Sources: ADOT, BLM, ESRI, La Paz Co., USGS.

EXHIBIT B
ENVIRONMENTAL STUDIES

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

Attach any environmental studies which applicant has made or obtained in connection with the proposed site(s) or route(s). If an environmental report has been prepared for any federal agency or if a federal agency has prepared an environmental statement pursuant to Section 102 of the National Environmental Policy Act, a copy shall be included as a part of this exhibit.

Introduction

Exhibit A describes land use; **Exhibit C** addresses potential impacts to sensitive biological resources; **Exhibit D** discusses potential impacts to other biological resources; **Exhibit E** summarizes the potential effects on the area's scenic quality and cultural resources; **Exhibit F** summarizes the potential effects on recreation resources; **Exhibit H** describes how the Project could affect existing local plans; and **Exhibit I** discusses the noise and communication impacts that are expected.

In addition to the analysis in the CEC Exhibits listed above, below includes the following overview:

- **Air Quality**
- **Water Resources**

The Applicant is in the process of obtaining a Bureau of Land Management (BLM) Right-of-Way for the proposed Gen-Tie route, and the Project is being evaluated through the National Environmental Policy Act (NEPA) process. An Environmental Assessment (**Exhibit B-1)** and Plan of Development (**Exhibit B-2**) have been prepared for the portion of the Gen-Tie route on BLM land, referred to in the reports as the McMullen Valley Transmission Project.

Consultants on behalf of the Applicant have prepared the following reports and plans that are attached to **Exhibit B**:

- **Exhibit B-1:** McMullen Valley Transmission Project Environmental Assessment
- **Exhibit B-2:** McMullen Valley Transmission Project Plan of Development
- **Exhibit B-3:** Memorandum - Summary of Water Use Model Simulations for Project and Eagle Eye Energy Center Groundwater Basin Analysis and Modeling Report

Environmental Studies

Air Quality

On December 31, 2025, the Applicant submitted an Arizona Department of Environmental Quality (ADEQ) Class I Air Permit Application for construction and operation of the proposed Eagle Eye Thermal Plant in La Paz County, Arizona, northeast of Wenden. The current Application seeks authorization for an approximately 350-megawatt (MW) site-rated simple-cycle power generation facility (Thermal Plant) and evaluates emissions and regulatory applicability for the equipment configurations under consideration as described below. The Applicant would seek additional air permit authorization for subsequent phases. This exhibit summarizes the Project description, baseline air quality, air quality impacts during operation, and greenhouse gas (GHG) emissions from the Project.

Project Description

The Applicant requested permitting flexibility for three proposed design configurations. Proposed Design Configuration (PDC) 1 consists of 20 Wartsila 18V50DF reciprocating internal combustion engines, each rated at approximately 18 MW, with four additional redundant units. PDC 2 consists of eight GE Vernova LM6000 simple-cycle combustion turbines, each rated at approximately 53 MW, with two additional redundant units. PDC 3 consists of thirteen Siemens Energy SGT-A35 simple-cycle combustion turbines, each rated at approximately 33 MW, with four additional redundant units. All proposed engines and turbines would be capable of firing natural gas and ultra-low sulfur diesel (ULSD); natural gas is expected to be the primary fuel, with ULSD operation limited to short-duration backup operation of up to 75 hours per year per unit.

Ancillary equipment includes four 2-million-gallon diesel storage tanks, natural gas piping components, turbine lube oil systems, and nine circuit breakers containing sulfur hexafluoride (SF_6). Combustion units would be equipped with selective catalytic reduction (SCR) systems for nitrogen oxides (NO_X) control and oxidation catalysts for carbon monoxide (CO) and volatile organic compound (VOC) control. These controls, together with operating limits, ULSD use, and compliance monitoring, are central to the Project air quality strategy.

Baseline Air Quality

The Project site is located in La Paz County, in an area identified as attainment or unclassifiable for all National Ambient Air Quality Standards (NAAQS). As a result, the federal Prevention of Significant Deterioration (PSD) program is the major New Source Review (NSR) program potentially relevant to the Project, while nonattainment NSR does not apply based on the site location and attainment status.

Air Quality Impacts During Operation

Operational emissions would result primarily from combustion of natural gas and limited ULSD in the selected turbine or engine configuration, including normal steady-state operation as well as startup and shutdown. Additional emissions would be associated with diesel storage tanks, lube oil vents, natural gas fugitive components, and SF_6 containing circuit breakers.

The Project triggers ADEQ Class I permitting because potential emissions exceed the Class I major source thresholds for regulated air pollutants (100 tons per year [tpy]) and Hazardous Air Pollutants (HAPs) (10 tpy or more of any HAP or 25 tpy or more of any combination of HAPs). Note, the Project is not a listed categorical PSD source, and the non-fugitive emissions of each regulated NSR pollutant remain below the 250 tpy PSD major source threshold; therefore, the application concludes the Project is not subject to PSD review.

Because the Project is a new Class I source and emissions of regulated minor NSR pollutants exceed permitting exemption thresholds, Arizona minor NSR requirements apply. The Applicant elected to support the minor NSR demonstration with an air dispersion modeling analysis using the EPA promulgated American Meteorological Society / Environmental Protection Agency Regulatory Model (AERMOD). Based on results from the modeling demonstration, including a Modeled Emission Rates for Precursors evaluation for ozone, the Project will not cause or contribute to a violation of any applicable NAAQS. Additionally, the predicted ozone formation from the project emissions were all below the significant impact level (SIL) and as such no further ozone analysis was conducted.

Greenhouse Gas Emissions

GHG emissions do not independently trigger PSD review. Under the federal PSD program, GHG emissions are subject to PSD review only where a facility is otherwise a major stationary source for a regulated NSR pollutant other than GHGs and the facility's GHG emissions equal or exceed 75,000 tpy carbon dioxide equivalent (CO_2e). Although GHGs are not included in the definition of regulated air pollutant, they are considered a regulated NSR pollutant for purposes of the federal PSD program. Accordingly, the Applicant quantified the Project's GHG emissions using combustion emission factors for natural gas and diesel and global warming potentials from 40 CFR Part 98. Because the Project does not trigger PSD review for any non-GHG regulated NSR pollutant, the quantified GHG emissions are disclosed and evaluated for applicable regulatory purposes but do not trigger PSD review or GHG Best Available Control Technology (BACT) requirements.

Conclusion

The ADEQ Class I Permit Application supports the conclusion that the Project can be designed and operated in compliance with applicable ADEQ, Arizona, and federal air quality requirements. The Project is located in an attainment or unclassifiable area for all NAAQS, would employ SCR and oxidation catalyst controls on the primary combustion equipment, would limit diesel use, and is subject to Class I permitting, minor NSR review, applicable New Source Performance Standards/National Emission Standards for Hazardous Air Pollutants (NSPS)/(NESHAP) requirements, monitoring, recordkeeping, reporting, and annual compliance certification. Based on the modeling and regulatory analyses described in the application and supplemental modeling report, the Project is not expected to cause or contribute to a violation of the NAAQS.

Water Use

The Project is located within the McMullen Valley groundwater basin in western Arizona. Water would be sourced from a non-potable well within the Energy Center site, sourced from a local municipal water provider via a newly constructed water pipeline, or trucked in from an offsite

water purveyor. Since each potential water source proposed for the Project would draw from the groundwater basin, Clear Creek Associates prepared a memorandum summarizing water use model simulations for the Project and a groundwater availability assessment study for the Energy Center to determine the sufficiency of the proposed water supply to meet the Project demands and analyze a conservative scenario for potential groundwater use. The memorandum and assessment are provided as **Exhibit B-3**. The Thermal Plant and Gen-Tie are estimated to require up to 160 acre-feet (AF) of water during the 12-month construction period for dust control and earthwork compaction. Operational water demand for the Thermal Plant is estimated to be 10 AF annually for the Thermal Plant. The groundwater availability assessment determined that the Energy Center will not adversely impact surrounding wells and groundwater levels, and demonstrated that that even if that maximum volume were pumped every year, there is enough groundwater to support that production over the life of the Project facilities. See **Exhibit B-3**.

EXHIBIT B-1
MCMULLEN VALLEY TRANSMISSION PROJECT
ENVIRONMENTAL ASSESSMENT

U.S. Department of the Interior
Bureau of Land Management

Lake Havasu Field Office

McMullen Valley Transmission Project

Environmental Assessment

DOI-BLM-AZ-CO30-2026-XXXX-*DOE/EA-2292*

Department of the Interior
Bureau of Land Management
Colorado River District
Lake Havasu Field Office
1785 Kiowa Avenue
Lake Havasu City, AZ 86403
928.505.1200

Cooperating Agency
U.S. Department of Energy
Western Area Power Administration
Desert Southwest Region

Applicant
EAGL, LLC
515 N Flager Drive, Suite 250
West Palm Beach, FL 33401

March 2026

It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

DOI-BLM-AZ-CO30-2026-XXXX-*DOE/EA -2292*

Compliance for Section 508 of the Rehabilitation Act

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TABLES

FIGURES

APPENDICES

ACRONYMS AND ABBREVIATIONS	Full Phrase
Applicant	EAGL, LLC
AZGFD	Arizona Game and Fish Department
BLM	Bureau of Land Management
BMP	Best management practices
CT	current transformers
EA	Environmental assessment
EAGL	EAGL, LLC
EIS	Environmental impact statement
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act of 1976
GHG	Greenhouse gas
ID	Interdisciplinary
IPaC	Information for Planning and Consultation
KOP	Key observation point
kV	Kilovolt
LAA	Lower Alluvial Aquifer
LHFO	Lake Havasu Field Office
LOS	Level of service
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Agency
O&M	Operation and maintenance
OATT	Open access transmission service tariff
OHV	Off-highway vehicle
PEIS	Programmatic environmental impact statement
PFYC	Potential fossil yield classification
POD	Plan of development
RFFA	Reasonably foreseeable future actions
RMP	Resource Management Plan
ROD	Record of Decision
ROW	Right-of-way
SDT	Sonoran Desert tortoise
SWFL	Southwestern willow flycatcher
TIA	Traffic impact analysis
US-60	U.S. highway 60
USFWS	U.S. Fish and Wildlife Service
WAPA	Western Area Power Administration
WYBC	Western yellow-billed cuckoo

Chapter 1. Introduction

1.1 Background

EAGL, LLC (EAGL or Applicant), a subsidiary of BNC DEVCO, LLC, has submitted an application and a Plan of Development (POD) to the U.S. Bureau of Land Management (BLM) to acquire a right-of-way (ROW) for the McMullen Valley Transmission Line Project (Project) (AZAZ106761623). The Project includes the construction, operation, maintenance, and decommissioning of a new single-circuit, 230-kilovolt (kV) transmission line up to 6 miles in length within a 150-foot-wide corridor, together with a transmission line access road and associated Project access roads (the Proposed Action). The Project is proposed on land administered by the Colorado River District Lake Havasu Field Office (LHFO) and situated approximately 3 miles north of the unincorporated community of Wenden and 100 miles west of Phoenix in La Paz County, Arizona (Figure 1-1). If approved, the ROW would be issued for an initial term of 40 years with the option to renew.

The requested ROW would authorize the use of approximately 740 acres (Project area) of public land for the Project to interconnect to the Western Area Power Administration's (WAPA's) existing Harcuvar Substation. The anticipated maximum area required for the final ROW grant is 88 acres, consisting of a 150-foot-wide transmission line corridor with an associated transmission line access road.

EAGL submitted an interconnection request to interconnect the Project with WAPA's substation. WAPA is a federal power-marketing agency within the U.S. Department of Energy and is the decision maker for the interconnection request. The new transmission line would extend from a new substation on state or private land to interconnect with the existing Harcuvar Substation. Expansion of the Harcuvar 230-kV Substation and minor upgrades at two additional WAPA substations would be required to accommodate the interconnection. The proposed interconnection would facilitate the delivery of electric power between the McMullen Valley Transmission Project and WAPA's Desert Southwest Region transmission system.

The Project responds to growing electricity demand in Arizona. Additionally, statewide forecasts from major utilities indicate substantial load growth over the coming decade, which will require new generation resources and supporting transmission infrastructure to maintain reliability and affordable supply. The proposed Project is intended to help address these system-wide needs.

The BLM will serve as the lead federal agency for the National Environmental Policy Act (NEPA) review. WAPA, as the agency responsible for the interconnection decision, will act as a cooperating agency under NEPA.

This Environmental Assessment (EA) analyzes and discloses the potential environmental effects associated with BLM's ROW authorization and WAPA's interconnection action. No additional alternatives that would shorten the transmission line or further reduce Project impacts were identified; therefore, this EA analyzes the Proposed Action and the No Action Alternative. If analysis indicates no significant effects, the BLM will issue a Finding of No Significant Impact and prepare a Decision Record; if significant effects are likely, the BLM will either select the No Action Alternative or prepare an Environmental Impact Statement (EIS). WAPA will use the information in this EA to inform its separate interconnection decision for the Harcuvar Substation and upgrades at two other existing substations.

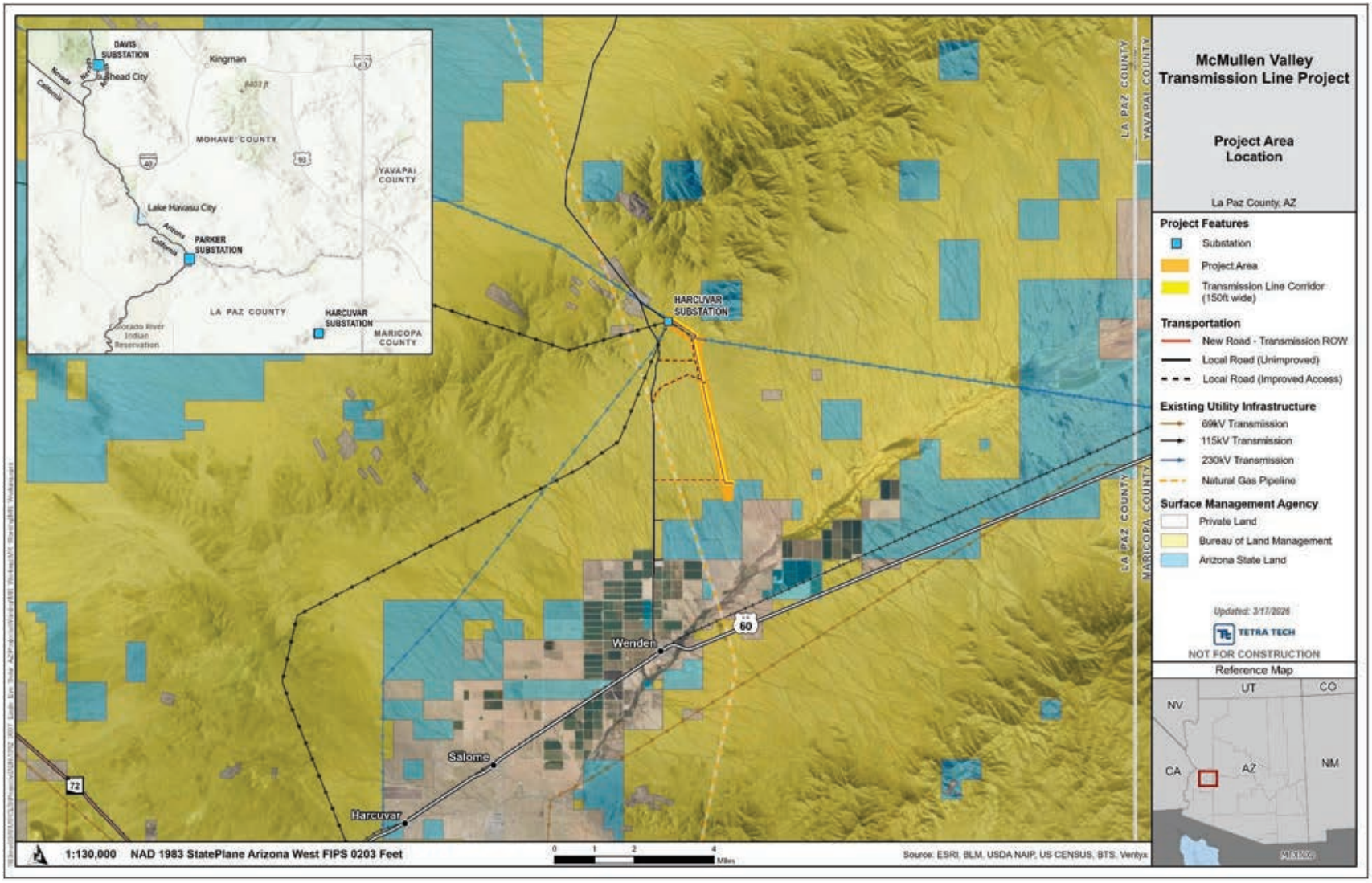

Figure 1-1. Project Location

1.2 APPLICANT'S GOALS

The Applicant's primary goals are to enhance grid reliability and security by providing additional energy, capacity, and ancillary services. WAPA has documented substantial increases in electrical demand across western Arizona, and the Project is needed to meet customer needs and system reliability requirements within WAPA's service territory. Project costs are estimated at approximately $10 million to $15 million for the transmission line and $20 million to $25 million for upgrades at the WAPA substations. Construction is expected to be completed within 6 to 12 months.

1.3 FEDERAL AGENCY PURPOSE AND NEED

1.3.1 Bureau of Land Management's Purpose and Need

In January 2026, the BLM received a ROW application (AZAZ106761623) and a POD from EAGL for the McMullen Valley Transmission Line Project. The Federal Land Policy and Management Act of 1976 (FLPMA) (43 United States Code 1761–1771) and the BLM's ROW regulations (43 C.F.R. Part 2800) direct the BLM to manage the public lands for multiple uses while considering the long-term needs of future generations. FLPMA authorizes the Secretary of the U.S. Department of the Interior to grant, issue, or renew ROWs for the distribution of electricity (see FLPMA §501(a)(4)).

The BLM's purpose is to respond to EAGL's request to provide reasonable access to install, operate, maintain, and later decommission a power line and associated appurtenances, and install, use, and maintain access routes that cross BLM-managed lands. The need for the action is established under BLM's responsibility under FLPMA, BLM ROW and lease regulations (43 Code of Federal Regulations 2800), and other applicable federal and state laws and policies to respond to a request for a ROW on BLM land for a power line facility and use and maintenance of short segments of existing roads that were previously constructed across public land.

1.3.2 Western Area Power Administration's Purpose and Need

WAPA owns, operates, and maintains transmission lines and associated facilities in accordance with the Federal Power Act Sections 210 to 213, and its Open Access Transmission Service Tariff (OATT), which is filed with the Federal Energy Regulatory Commission.

WAPA's purpose is to consider and respond to EAGL's large generator interconnection agreement (LGIA) request in accordance with WAPA's Large Generator Interconnection Procedures to WAPA's OATT. The need for WAPA's action arises from statutory, regulatory, and service-obligation duties that require WAPA to demonstrate that such requests do not degrade system reliability or safety or adversely affect service to existing customers. WAPA conducts feasibility, system impacts, and facility studies to determine the transmission system upgrades or additions necessary to meet these requirements and accommodate the proposed interconnection. Under WAPA's OATT, interconnections are offered to all eligible customers on a first-come, first-served basis, subject to an environmental review of the federal action under NEPA.

WAPA is responsible for the reliable operation and maintenance of its transmission system and complying with the North American Electric Reliability Corporation Reliability

Standards. Accordingly, if WAPA were to approve the Applicant's interconnection request, modifications to WAPA's existing infrastructure are required at the Harcuvar 230-kV substation, Parker 230-kV substation, and Davis 230-kV substation (Figure 1-1). These modifications include upgrading the configuration at Harcuvar 230-kV substation from a tap to a three-breaker-ring, upgrading metering current transformers (CTs) and jumpers at Parker 230-kV substation, and upgrading jumpers and metering CTs and establishing protection system redundancy at Davis 230-kV substation. Therefore, to comply with this standard, modifications to WAPA's substations are part of the Proposed Action.

1.4 DECISION TO BE MADE

1.4.1 Bureau of Land Management's Decision

The BLM will decide whether to grant, grant with modifications, or deny the ROW application. In making its decision, the BLM must consider and determine the environmental impacts on all lands affected as a result of granting a ROW on BLM-administered public lands. As part of its decision-making process, and according to 43 CFR 1610.3-2, the BLM must consider consistency with its LHFO Resource Management Plan (RMP), which provides for land and realty management actions for ROW grants.

1.4.2 Western Area Power Administration's Decision

WAPA will decide whether to approve, approve with modifications, or deny the large generator interconnection request to WAPA's Harcuvar Substation, including the additional project-related system modifications described in the Purpose and Need**.**

1.5 RELATIONSHIP TO STATUTES AND REGULATIONS

- Archaeological Resources Protection Act of 1979, as amended – establishes protections for archaeological resources on federal lands.
- Arizona Native Plant Law – protects native plants by regulating their removal and implements procedural requirements for such removals.
- Clean Air Act of 1970, as amended – established to protect public health and the environment by regulating air pollution and setting National Ambient Air Quality Standards.
- Clean Water Act of 1972, as amended – regulates discharges of pollutants into the waters of the United States and provides quality standards for surface waters.
- Endangered Species Act (ESA) of 1973 – established protections for fish, wildlife, and plants that are federally listed and provides for interagency cooperation to avoid take of listed species.
- Energy Policy Act of 2005, as amended – increased the Federal Energy Regulatory Commission's authority over WAPA, authorizing them to issue rules governing market price information, obtain market price and availability information from market participants, and publish rules prohibiting market manipulation.

- Executive Order 13132 Federalism – if a Proposed Action has federal implications, the agency must consult with affected state and local officials early in the process, provide timely notice, and consider input before taking final action.
- Executive Order 13175 Consultation and Coordination with Indian Tribal Governments – BLM will have regular, meaningful, and timely consultation and coordination with tribal officials related to tribal implications of the Proposed Action.
- Federal Land Policy and Management Act of 1976, as amended – enables the BLM to manage public lands for multiple use and is authorized to grant, issue, or renew a ROW over, upon, under, or through lands.
- Federal Power Act of 1935 as amended – established the Federal Power Commission (now the Federal Energy Regulatory Commission) and made WAPA subject to its jurisdiction.
- Migratory Bird Treaty Act of 1918[1] – established to protect migratory birds and their habitats by prohibiting the take of protected migratory bird species without prior authorization by the U.S. Fish and Wildlife Service (USFWS).
- National Historical Preservation Act of 1966, as amended – aims to preserve historic and archaeological sites in the United States.

1.6 Resource Management Plan Conformance and Relationship to Other Plans and Analyses

1.6.1 Lake Havasu Resource Management Plan Conformance

The project is located on BLM-administered lands in the LHFO's jurisdiction and is subject to the management direction detailed in the 2007 Lake Havasu Record of Decision (ROD) and Approved RMP (BLM 2007a). The Proposed Action is in conformance with the following management direction and objectives:

- WF-20. Construction sites for wind turbines, power lines, telecommunication, towers, solar power sites, and any other new technology, etc., will conform with guidelines developed by the USFWS to minimize impacts to wildlife species, particularly migratory birds and bats.
- LR-11. New utility facilities will be located in designated corridors unless an evaluation of the project shows that location outside of a designated area is the only practicable alternative.
- LR-14. In utility corridors, uses including but not limited to transportation, pipelines, and electrical transmission lines will be allowed when the uses are compatible. These designated corridors apply only to BLM-administered lands.

[1] The USFWS withdrew its advance notice of proposed rulemaking on April 21, 2025, to potentially authorize the incidental taking or killing of migratory birds, consistent with its interpretation of the Migratory Bird Treaty Act. As it stands, the October 4, 2021, **final rule** remains in effect, meaning the USFWS is still implementing the Migratory Bird Treaty Act as prohibiting incidental take and applying enforcement discretion consistent with judicial precedent and agency practice

1.6.2 Tiered Documents

1.6.2.1 Vegetation Treatments Programmatic EISs and EAs

The use of chemical herbicides on public lands in 17 western states, including Arizona, has been evaluated to assess the potential risks to human health and the environment. The programmatic documents including the 2007 *Vegetation Treatments Using Herbicide on Bureau of Land Management Lands in 17 Western States PEIS* (BLM 2007b), the 2016 *Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States PEIS* (BLM 2016), and the 2023 Programmatic EIS (PEIS) *Addressing Vegetation Treatments Using Herbicides* (BLM 2023, BLM 2024) analyzed the potential risks including the effect of listed herbicide use on the health of people, vegetation, fish and wildlife, livestock, wild horses, and burros, as well as the quality of water and the use of resources by Native Americans. The analyses in the three documents were found to be applicable to this EA and tiers to those analyses related to pesticide use.

1.7 SCOPING AND ISSUES

The BLM Interdisciplinary (ID) Team and WAPA evaluated the Proposed Action and prepared an ID Team Analysis Record Checklist to identify resource values, issues, and land uses that could be affected by development of the requested ROW and interconnection. The Checklist also documents issues analyzed in detail (see Section 1.7.1), resource values and issues dismissed from further analysis (see Section 1.7.2), and provides the rationale used for dismissing resource values/issues present but eliminated from further analysis (see Section 1.7.3).

1.7.1 Issues Analyzed in Detail

The Checklist also provides the rationale used for dismissing certain issues from detailed analysis. Issues analyzed in detail are provided in **Table 1-1**. No external public scoping was conducted for the Proposed Action.

Table 1-1. Issues Analyzed in Detail

Resource Value	Issue #	Issue Statement
Traffic	1	How would construction, operations and maintenance, and decommissioning activities impact local traffic patterns and travel management along Highway 60?
Lands and Realty Access	2	How would the Proposed Action impact access to existing roads that overlap with the Project area?
Social and Economic Values	3	How would the Proposed Action impact local employment, the economy, services, and quality of life for communities?
Soils	4	How would surface disturbance from the Proposed Action contribute to soil compaction and erosion?
Paleontological Resources	5	How would the Proposed Action impact paleontological resources classified as Potential Fossil Yield Classification - unknown in the Project area?
Rangeland	6	How would construction, operations and maintenance, and decommissioning activities impact existing range improvements within the area of the Proposed Action?

Resource Value	Issue #	Issue Statement
Livestock Grazing	7	How would the Proposed Action impact forage availability within the Babcock grazing allotment?
Wildlife - Federally-listed Southwestern Willow Flycatcher	8	How would construction, operations and maintenance, and decommissioning of the Project affect migrating or dispersing southwestern willow flycatchers?
Wildlife - Federally-listed Western Yellow-billed Cuckoo	9	How would construction, operations and maintenance, and decommissioning of the Project affect migrating western yellow-billed cuckoos?
Wildlife - Special Status Species - Sonoran Desert Tortoise	10	How would construction, operations and maintenance, and decommissioning of the Project affect the Sonoran Desert tortoise and its habitat?

1.7.2 Resource Values and Issues Dismissed from Further Analysis

Based on field surveys and other analyses, the ID team determined that that the following resources/issues are not present in the Proposed Action area: areas of critical environmental concern; cultural resources; farmlands (prime or unique); floodplains; forestry and woodlands; lands with wilderness characteristics; national conservation areas; National Historic Trails; national recreational trails; vegetation designated by USFWS, wetlands and riparian habitat; wildlife designated by USFWS (Gila topminnow [*Poeciliopsis occidentalis*]); wild and scenic rivers; wild horses and burros; and wilderness/wilderness study areas.

1.7.3 Resource Values Present but Eliminated from Further Analysis

The following resources and resource uses were determined by the ID Team to be present within the Proposed Action area but not be impacted to the degree that would require detailed analysis in the EA (i.e., no relevant impacts): air quality and greenhouse gas emissions; Department of War military training routes and designated Special Use Air Space; fuels and fire management; hazardous and solid waste; lands and realty authorizations, permits, and leases; migratory birds including golden eagles, raptors, and Western burrowing owl; Native American concerns; public health and safety; recreational opportunities; saleable, locatable, and leasable minerals; vegetation, including non-designated, invasive, non-native plant species, special-status species other than USFWS-designated; visual resources; water resources including groundwater, surface, and water quality; wilderness/ wilderness study areas, and wildlife including special status species, USFWS non-designated species, and USFWS-designated monarch butterfly (*Danaus plexippus*).

Chapter 2. Alternatives

Chapter 2 describes the Proposed Action and the No Action Alternative. The BLM did not identify any other alternatives for detailed analysis.

2.1 PROPOSED ACTION

Figure 2-1 depicts the approximate 740-acre Project area and the proposed transmission line corridor. The actual location of the 150-foot-wide corridor will be determined during final design. Below is a list of components, and detailed information is provided in the Applicant's POD [Tetra Tech 2024a]).

- Up to a 6-mile-long, single-circuit 230-kV transmission line between a newly constructed substation on state or private land and the existing Harcuvar Substation on BLM-administered land.
- Up to a 6-mile-long, two-track transmission line access road that will overlap with the existing unpaved Rattlesnake Road and newly constructed portions.
- Up to 10 pull pockets measuring 600 feet by 150 feet each, and four 3-acre-sized staging areas sited along the transmission line corridor for short-term use during construction.
- Upgrades to the existing WAPA substations: Harcuvar, Parker, and Davis. Harcuvar Substation is the only substation that will require a footprint expansion of up to 2 acres (location expansion will be provided at final design).
- Up to 4.4 miles (23,231 linear feet) of road improvements to four existing access routes (north to south): Rattlesnake Road; 77th Street; Low Mountain Road, and Unnamed Road 1. The Project will also use existing two-track roads with no improvements: Unnamed Road 2 and Access Road (Figure 2-2).
- No improvements to the northern portion of the existing unpaved access road leading to Harcuvar Substation or Alamo Road.

The POD provides a detailed description of the proposed components, design criteria, construction through decommissioning activities, design features,[2] and environmental considerations. As development progresses through the engineering design process and permitting, the POD will be revised accordingly.

[2] Design features (sometimes called *design elements*) mean specific means, measures, or practices incorporated into the proposed action or action alternatives. Mitigation measures included in the proposed action or any action alternative and evaluated through the NEPA process are design features (BLM 2026).

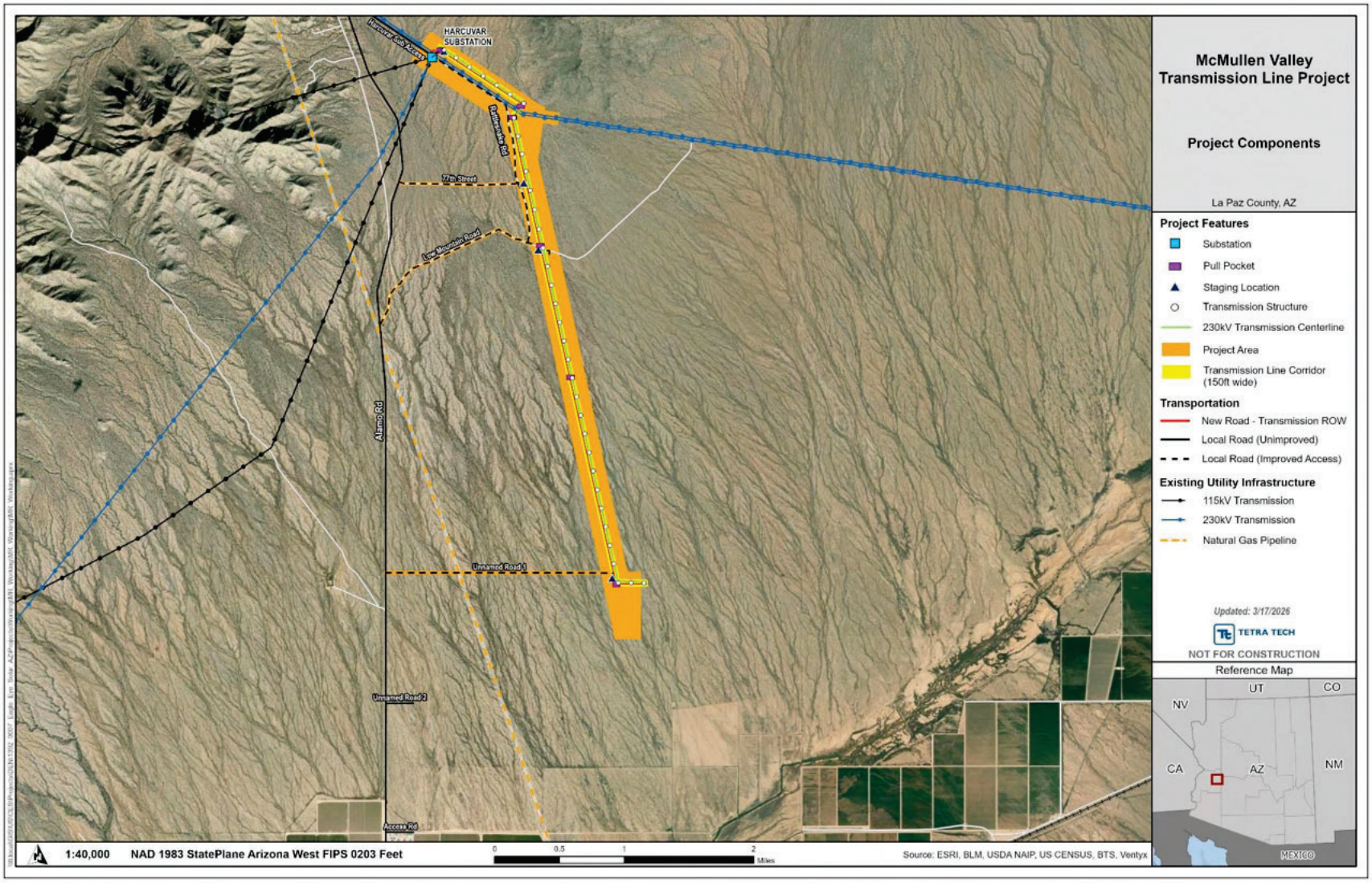

Figure 2-1. Proposed Action

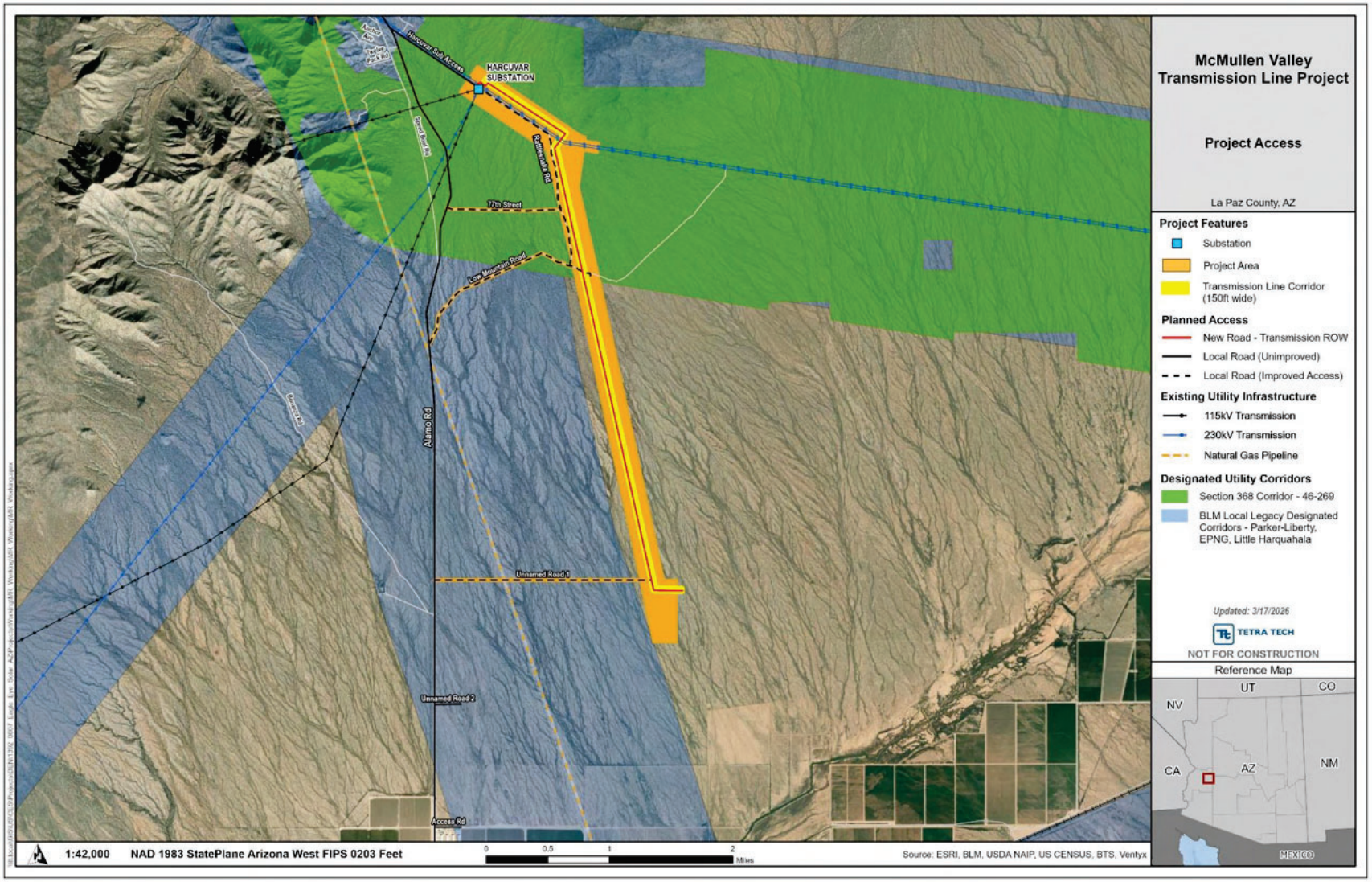

Figure 2-2. Proposed Access Roads

2.1.1 Components of the Proposed Action

Components of the Proposed Action are summarized in this section; the disturbance associated with the Proposed Action is listed in Table 2-1. Up to 92 acres would be disturbed due to Project construction. Short-term disturbance is calculated for the space required to complete construction-related activities, whereas long-term disturbance is calculated for Project components that would remain in place during the life of the Project. Short-term disturbance areas would be reclaimed at the end of the construction period, and long-term disturbance areas would be reclaimed upon decommissioning of the Project. Key components are shown in **Error! Reference source not found.** but are subject to change based on the final design, with further details provided in the POD.

Table 2-1. Estimated Short-term and Long-term Disturbance - Proposed Action

Project Component	Project Area (acres)	150-foot Right-of-Way (acres)	Long-Term Disturbance (acres)	Short-Term Workspace (acres)	Proposed Total Disturbance[1] (acres)
Up to a 6-mile-long transmission line within a 150-foot-wide long-term right-of-way[2]	740	88	< 0	25	25
25-foot-wide transmission line access road within right-of-way	-	15	15	-	15
Project access roads[3]	-	-	27	-	27
Turnouts at project access roads	2	-	2	-	2
Harcuvar 230-kilovolt Substation	2	-	2[4]	-	2
Parker 230- kilovolt Substation	-	-	-	-	-
Davis 230- kilovolt Substation	-	-	-	-	-
Staging Areas (4, 3-acre areas)	12	-	-	12	12
Pull pockets (10, 2-acre areas)	20	-	-	20	20
Subtotal:					
Total Long-Term Disturbance (acres)					***46***
Total Short-Term Disturbance (acres)					***57***
Total Proposed Disturbance (acres)					***103***

[1] Acreages are not additive.
[2] Disturbance is calculated assuming the entire transmission line will use monopole or H-frame structures (8 structures × 6 miles = 48 structures), yielding a worst-case disturbance estimate for impact analysis. Each structure disturbance is estimated at 79 square feet (or two-thousandths of an acre) for long-term impacts and 22,500 square feet (0.51 acre or 150-feet by 150-feet) for short-term impacts.
[3] Disturbance calculated is based on the existing width minus the proposed width. Short-term workspace (15-feet) for access roads will overlap the final proposed road widths.
[4] Substation expansion design may or may not overlap the 150-foot-wide transmission line corridor.

- **Transmission Line Corridor:** An approximately 6-mile-long, 230-kV transmission line to transmit power from the newly constructed project substation to the existing Harcuvar Substation.
  - Transmission Line: Confined within a 150-foot-wide corridor located partially within the existing Section 368 corridor (46-269) and BLM Locally Designated Corridors

(Parker-Liberty, EPNG, Little Harquahala). Range of 5 to 8 structures per mile (i.e., monopole or H-frame) with span lengths ranging from 500 to 1,200 feet and 75 to 115 feet in height; disturbance totals less than an acre (long-term) and 25 acres (short-term). Short-term disturbance for staging areas and pull pockets totals 32 acres. A newly constructed transmission line access road measuring up to 6 miles × 25-feet wide (15 acres) that will overlap with portions of Rattlesnake Road. Installation of overhead electrical lines in support of the transmission line would be designed and installed in accordance with the Avian Power Line Interaction Committee's *Suggested Practices for Avian Protection on Power Lines* (APLIC 2006) and *Reducing Avian Collisions with Power Lines: State of the Art in 2012* (APLIC 2012).

- **Project Access Roads:** Five existing, unpaved roads are proposed for improvement (e.g., widening, turnouts, gravel) to access the Project during construction/decommissioning, while one existing unpaved road would remain in use without improvements (northern portion of the road providing access to Harcuvar Substation) (Figure 2-2).
- WAPA Harcuvar Substation Upgrades: Located in the transmission line corridor and expanded by up to 5 acres from a tap to a three-breaker ring to support Project interconnection. The expansion would host the entry and exit of WAPA's Liberty-to-Parker #1 transmission line, the Project's transmission line, and step-down transformers that support the current load. Location of the expansion area will be provided during final design.
- **WAPA Substation Upgrades:** upgrading metering CTs and jumpers at Parker 230-kV substation, and upgrading jumpers and metering CTs and establishing protection system redundancy at Davis 230-kV substation (see Figure 1-1 for substation locations).
- **Water Use:** Water would be obtained from an off-site well for construction and decommissioning activities. Temporary water storage facilities (i.e., tanks) may be implemented during construction. Water use for construction-related activities, including dust control, would require an estimated 8-acre-feet of water or an estimated 2,500,000 gallons of water. No water usage is anticipated during operations and maintenance, and decommissioning activities are estimated to use one-quarter of the amount of water used for construction.

2.1.2 Construction

Construction is estimated to occur over a single period of approximately 6 to 12 months, which includes mobilization, grading/site preparation, erosion control measures, construction/ installation, commissioning/testing, and demobilization.

Construction activities would adhere to the following management plans/programs, as applicable: Fugitive Dust Control Plan; Health & Safety Program; Integrated Vegetation, Weed, and Pest Management Plan; Stormwater Pollution Prevention Plan; Unanticipated Discovery Plan; and Worker Environmental Awareness Program.

2.1.2.1 Laydown/Staging Areas

Four temporary areas for construction mobilization and staging have been identified. These areas would be selected based on a lack of resource concerns. The staging areas would require a total

of approximately 12 acres and would be located close to the ROW and Harcuvar Substation to support its expansion for interconnection. The areas would include storage for equipment, parking, covered trash disposal facilities, construction trailer(s), portable toilets, and potable water. Potable water would be provided in portable tanks and/or recyclable bottles/containers. Prior to the availability of permanent power, temporary construction power would be provided by the local utility or would come from diesel generators. The staging areas would be compacted earth and would be reclaimed if not subsumed by components.

2.1.2.2 Construction Workforce and Timing

The on-site construction workforce is expected to average 50 workers per day and peak at 75 workers per day during the estimated 6- to 12-month construction period. Most construction staff and workers commute daily to the jobsite from the surrounding area and park in temporary laydown areas. Construction would occur up to 7 days per week for an estimated 10 to 12 hours per day. Occasional nighttime work may be needed to avoid daytime heat (e.g. laying concrete).

Construction would include the following activities, listed in approximate sequential order (some construction activities would occur simultaneously):

- Site preparation, including surveying, staking, and flora and fauna clearance surveys;
- Site grading (where needed) and installation of erosion control measures;
- Improvements to site access;
- Construction of Substation;
- Installation of transmission line components;
- Testing and commissioning; and
- Restoring temporary disturbance areas (as needed).

Typical construction equipment associated with the construction of a transmission line would be used (see Section 3.2 POD), but actual equipment and durations may vary. During the Project construction period, construction-related activities, including dust control, would require an estimated 8-acre-feet (or an estimated 2,500,000 gallons of water).

Primary waste generated during construction (and operations and maintenance [O&M]) would be solid and liquid waste, including scrap wood, steel, glass, plastic, paper, and metals, empty waste containers, waste oil filters, oily rags and oil sorbent, spent lead acid batteries, waste oil, and sanitary waste. Minimal amounts of hazardous materials would be used, and if any are stored onsite temporarily, storage would be in accordance with best management practices (BMPs).

Vegetation cleared from the project would be hauled off-site for proper disposal. The remaining vegetation that interferes with construction or safe storage locations for equipment, vehicles, and materials would be trimmed or mowed to 12 inches. EAGL will follow local, State, and Federal laws for the removal and relocation of protected plants.

To mitigate potential fire risk, firefighting equipment (i.e., portable fire extinguishers) would be maintained in accordance with local and federal Occupational Safety and Health Administration requirements and stored in all work vehicles.

All construction and operation contractors would be required to operate under a Health and Safety Program that meets industry standards. Site personnel would be required to go through a new hire orientation and follow the Worker Environmental Awareness Program, which would address project-specific safety, health, and environmental concerns.

2.1.3 Operations and Maintenance

Routine equipment maintenance and inspections would be performed in accordance with the manufacturer's requirements. O&M activities would include semi-annual and annual inspections, routine maintenance, repair and replacement of equipment, vegetation management, and site security and management (see Table 4.1 in the POD).

2.1.4 Decommissioning and Site Reclamation

The proposed Project is expected to have a useful life of up to 40 years, after which the Applicant may apply to the BLM for renewal of the ROW authorization or decommission the Project. Decommissioning includes removing the transmission line and its components and restoring the area. For this EA, decommissioning has been analyzed in Chapter 3 for all resources.

Decommissioning activities are assumed to require one-third of the workforce, time, and resources as Project construction and are expected to occur over 6 months, with support up to 35 workers. Similarly, the estimated water usage required for decommissioning activities is one-third of the amount for construction, for a total of up to 2 acre-feet (or an estimated 651,705 gallons).

2.1.5 Design Features

The environmental analysis in Chapter 3 assumes that all applicable design features[3] which includes management plans, Applicant environmental protection measures, and industry BMPs, would be implemented to minimize or avoid adverse effects from the Proposed Action.

Proposed management plans/programs, as required:

- Fugitive Dust Control Plan
- Health and Safety Program
- Integrated Vegetation, Weed, and Pest Management Plan
- Stormwater Pollution Prevention Plan
- Worker Environmental Awareness Program
- Unanticipated Discovery Plan

These plans will not be "final" until a NEPA decision has been made by the BLM and WAPA.

[3] Design features (sometimes called *design elements*) mean specific means, measures, or practices incorporated into the proposed action or action alternatives. Mitigation measures included in the proposed action or any action alternative and evaluated through the NEPA process are design features (BLM 2026).

2.1.5.1 Applicant Environmental Protection Measures

The Applicant has committed to the following environmental protection measures to minimize potential impacts:

1. Avoid several natural drainages to maintain flow.
2. Project substation and interconnection overhead electrical lines would be designed and installed in accordance with the Avian Power Line Interaction Committee's *Suggested Practices for Avian Protection on Power Lines.*
3. All local, state, and Federal laws for the removal and relocation of protected plants would be adhered to.
4. Implementation of the following Sonoran Desert tortoise (*Gopherus morafkai*) measures adapted from the Arizona Interagency Desert Tortoise Team's *Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat* (AIDTT 2008):
    a. An Arizona Game and Fish Department (AZGFD) Protocol Survey shall be completed prior to ground disturbing activities.
    b. During construction activities, open trenches should have a soil ramp to allow wildlife to escape and should be inspected routinely and prior to backfilling for entrapped desert tortoise (as well as other species).
    c. Construction material staging areas shall be checked for tortoises and other species prior to moving materials (e.g., pole piles, culverts, trailers, etc.).
    d. During construction and maintenance activities, vehicles should not exceed posted speed limits within the Project area. The area near and under vehicles should be inspected for desert tortoise before being moved.
    e. Operators/contractors should receive a copy of the *Guidelines for Handling Sonoran Desert Tortoise Encountered on Roads and Vehicle Ways* (BLM N.D), distribute to workers, and advise on handling procedures.
    f. Care should be taken to not disturb or destroy desert tortoise or their burrows. Pursuing, shooting, hunting, trapping, killing, capturing, snaring, or netting desert tortoises are prohibited by Arizona State Statute. If a desert tortoise is in danger of being harmed by any activity, that activity should cease until the desert tortoise moves out of harm's way on its own accord or is moved following the *Guidelines for Handling Sonoran Desert Tortoise Encountered on Roads and Vehicle Ways* (BLM N.D). To improve the quality of desert tortoise habitat management, foster public lands stewardship, and incorporate citizen science, the LHFO wildlife biologists invite you to participate in reporting of Sonoran Desert tortoise or their burrows encountered. This reporting is encouraged but not required. Report wildlife encounters using a smartphone to photograph the specimen and submit it by email to blm_az_lhfo@blm.gov. Alternatively, the location information (latitude and longitude or Universal Transverse Mercator), time, date, and suspected species common name can be submitted by email to blm_az_lhfo@blm.gov.

2.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the BLM would not approve EAGL's ROW request, and WAPA would not approve the interconnection request into the existing Harcuvar Substation and

upgrades to Harcuvar Substation and two other substations. The BLM administered land would continue in its current state to be managed under applicable federal laws, regulations, agency policies, management decisions, and directions contained in the BLM LHFO ROD/RMP, as amended (BLM 2007a). The additional power needed within western Arizona and system reliability requirements within WAPA's service territory would either not be available or would need to be obtained in some other way. The analysis of this alternative provides a baseline for the comparison of environmental impacts that may result from the implementation of the Proposed Action.

Chapter 3. Reasonably Foreseeable Effects of Alternatives

This chapter presents the existing conditions relevant to the issues described in Chapter 2 and describes the potential effects of the Proposed Action Alternative and No Action Alternative. Resource impacts projected to result from implementation of the Proposed Action were evaluated by BLM resource specialists through the ID Team review process, which included desktop reviews and field inventories. The results of these efforts are presented in this section in support of the impact analysis.

3.1 Existing Conditions Common to all Issues

3.1.1 Past Uses

In addition to Reasonably Foreseeable Future Actions (RFFAs), other prior and present uses of the Project area have contributed to current conditions. The Project overlaps with Camp Bouse, formerly a 313,665-acre historic military training center and camp used during World War II (see section 3.2.3; Tetra Tech 2023a; USACE 2022). Camp Bouse is known to have been used for munitions training per correspondence with the U.S. Army Corps of Engineers, a survey of the Project area revealed no material potentially presenting as an explosive hazard (Tetra Tech 2023a). Satellite imagery from Google Earth (Google Earth 2023) dating back to 1984 indicates that land to the south and southeast of the Project has historically been used for agricultural purposes for at least the past 41 years, with irrigation patterns shifting across areas over time. Imagery also shows that the WAPA Harcuvar Substation and Liberty to Parker transmission lines have been present since at least 1984, and the Project area has been utilized for cattle grazing for at least the past 30 years, as evidenced by the presence of range improvements.

3.1.2 Current Conditions

Current land uses contributing to resource conditions include off-highway vehicle (OHV) use, cattle grazing, dispersed recreation, and linear ROW authorizations, including roads and transmission lines on BLM and Arizona State Land Department-administered lands, as well as private lands. Additionally, the designation of the Section 368 Corridors and various BLM Legacy Locally Designated Corridors in the 5-mile area suggests future uses could include an increase in energy infrastructure (none have been identified as of March 16, 2026). Past and present actions are disclosed in the affected environment for each issue in Section 3.2.

3.2 Reasonably Foreseeable Future Actions Common to all Issues

RFFAs are actions that potentially affect an issue and occur within the geographic scope and timeframe of the analysis (BLM 2008). The RFFAs search was limited to projects located within 5 miles of the Proposed Action. RFFAs were identified through review of the BLM's NEPA Register and Mineral & Lands Record System (BLM 2022, BLM 2025a). No RFFAs were identified within 5 miles that could have direct and indirect effects that overlap in time and space with the Proposed Action.

3.3 IMPACT ANALYSIS

The issues associated with resources, uses, and supplemental authorities identified by the BLM and WAPA are carried forward for analysis and include those elements of the Proposed Action that would have the potential for environmental effects, as determined by the BLM.

The direct and indirect analysis area for each issue is described in Section 3.4. The temporal analysis is the life of the proposed Project, estimated to be at least to the end of the lease (30 years), combined with successful post-decommissioning reclamation. For this analysis, short-term impacts are defined as those that cease after construction and post-construction restoration activities; long-term impacts are defined as those that extend beyond the short-term. Some long-term effects would cease at the end of operations, whereas other long-term effects would remain through reclamation, depending on the nature of the effect, because the time for successful reclamation varies by vegetation and other factors like precipitation.

Impacts vary in intensity depending on the issue being evaluated. Indicators are used to define the magnitude of each impact, which is then compared to the analysis area to help inform impact intensity. Table 3-1 provides a summary of the issues relevant to resources and uses, including impact indicators used to assess the potential effect.

Table 3-1. Issues Analyzed

Resource/Use	Issue Statement	Impact Indicators
Lands and Realty Access	Issue 1: How would the Proposed Action impact access to existing roads that overlap with the Project area?	Quantify decreases in access to or availability of BLM-designated routes to public
Social and Economic Values	Issue 2: How would the Proposed Action impact local employment, the economy, services, and quality of life for communities?	Number and type of jobs related to Project construction and activities Predicted population growth related to project construction and activities Presence and extent of essential services (for example, housing, lodging, and food) in nearby communities Noise
Traffic	Issue 3: How would construction, operations and maintenance, and decommissioning activities impact local traffic patterns and travel management along Highway 60?	Changes in the level of service on area roadways
Soils	Issue 4: How would surface disturbance from the Proposed Action contribute to soil compaction and erosion?	Acres of surface disturbance Acres of soil susceptible to wind and water erosion (K factor and T factor) Acres of sensitive soils
Paleontological Resources	Issue 5: How would the Proposed Action impact paleontological resources classified as Potential Fossil Yield Classification - unknown in the Project area?	Acres of Potential Fossil Yield Classification - unknown surface disturbance
Rangeland	Issue 6: How would construction, operations and maintenance, and decommissioning activities	Number and type of existing range improvements

Resource/Use	Issue Statement	Impact Indicators
	impact existing range improvements within the area of the Proposed Action?	
Livestock Grazing	Issue 7: How would the Proposed Action impact forage availability within the Babcock grazing allotment?	Acres of surface disturbance Animal unit months removed
Wildlife - Federally-listed Southwestern Willow Flycatcher	Issue 8: How would construction, operations and maintenance, and decommissioning of the Project affect migrating or dispersing southwestern willow flycatchers?	Acres of surface disturbance Occurrences of southwestern willow flycatcher Noise
Wildlife - Federally-listed Western Yellow-billed Cuckoo	Issue 9: How would construction, operations and maintenance, and decommissioning of the Project affect migrating western yellow-billed cuckoos?	Acres of surface disturbance Occurrences of western yellow-billed cuckoo Noise
Wildlife - Special Status Species - Sonoran Desert Tortoise	Issue 10: How would construction, operations and maintenance, and decommissioning of the Project affect the Sonoran Desert tortoise and its habitat?	Acres of Sonoran Desert tortoise Category 1 and 2 habitat Acres of vegetation removal Number of individuals and burrows Noise

3.4 ISSUES ANALYZED

Following internal review, resources/uses recommended for detailed analysis were identified, along with issue statements to consider and analyze. Each issue statement outlined in Section 3.2 includes a concise discussion of the affected environment for the respective resource/use; the potential direct and indirect effects from the Proposed Action and the No Action Alternative, and the measures being implemented to avoid, mitigate, or minimize the effect(s).

3.4.1 Issue 1: How would construction, operations and maintenance, and decommissioning activities impact local traffic patterns and travel management along Highway 60?

The analysis area for traffic includes the Project area plus a 5-mile buffer to account for egress/ingress points for the Project.

3.4.1.1 Affected Environment

Access to the Project will be from U.S. Highway 60 (US-60) to Alamo Road, also known as 2nd Street and Cunningham Pass Road in Wenden, Arizona. At the intersection of US-60 and Alamo Road/2nd Street, head north onto Alamo Road, which includes crossing the Genesee and Wyoming, Inc., Arizona and California Railroad to access the Project. From Alamo Road, seven existing unpaved roads would be used: access road, unnamed access road 2, unnamed access road 1, Low Mountain Road, 77th Street, Rattlesnake Road, and the Harcuvar Substation access road.

US-60 is a paved, east-west, undivided highway with one lane in each direction, with a posted speed limit of 65 miles per hour (45 miles per hour at the intersection of Alamo Road/2nd Street). Alamo Road is a paved, north-south, two-lane, undivided road with a posted speed limit of 35 miles per hour.

The level of service (LOS) for an intersection or roadway is a qualitative measure of existing traffic operations. LOS rankings range from A (indicating little or no congestion and delay) to F (indicating unacceptably high congestion and delays). A LOS of C is typically the lowest acceptable rating for a rural road, and D is the lowest acceptable rating for an urban road. During the morning peak, the existing LOS rating for US-60 is A, and the LOS rating for Alamo Road/2nd Street is B. During the afternoon peak, the LOS rating for US-60 is B, and Alamo Road/2nd Street is A (Tetra Tech 2024b).

3.4.1.2 Environmental Consequences

Proposed Action. Construction activities would generate up to approximately 50 morning peak-hour trips, 50 afternoon peak-hour trips, and 100 average daily trips (i.e., one inbound and one outbound trip per worker and four truck trips). The number of commuter vehicles and truck deliveries would vary over the 6- to 12-month construction period. Project-related traffic and noise are expected to be temporary and intermittent. During the duration of improvements to access roads (access road, unnamed access road 2, unnamed access road 1, Low Mountain Road, 77th Street, and Rattlesnake Road), access to BLM lands from these roads would be intermittently unavailable to the public.

A Traffic Impact Analysis (TIA) will be prepared for the Project to assess the potential impact on roadway and intersection LOS during construction and operation. Results of the TIA are likely to conclude that affected roadways and intersections are expected to perform at a LOS C or better during morning and afternoon peak hours. Minor delays resulting from construction traffic at the intersections of 2nd Street and US-60 may occur and are likely to fall within the acceptable LOS based on the performance criteria for rural roads. Therefore, local roadways and intersections are anticipated to be able to accommodate construction-related traffic. Decommissioning traffic is anticipated to be similar but less than construction-related traffic.

Approximately one trip per week is anticipated during operation. The contribution of operational traffic is negligible and represents less than average daily traffic fluctuations. Vehicles carrying equipment and supplies would obtain and adhere to the conditions required for encroachment and oversize/overweight vehicle permits and adhere to conditions required by the Arizona Department of Transportation.

Water for construction is planned to come from an off-site well, and truck trip calculations are based on this scenario. If water supply comes from an off-site location within the basin and is transported by 4,000-gallon water trucks, it could generate up to 625 truck trips during construction. This increased traffic may cause minor impacts and longer delays.

No Action Alternative. No changes in existing traffic patterns are anticipated under the No Action Alternative, as Project activities would not occur. The BLM would not offer a ROW grant for the Project, nor would WAPA approve the interconnection request by the Applicant. LOS would continue at the same level, and no improvements to the five access roads would occur.

3.4.2 Issue 2: How would the Proposed Action impact recreational access to existing roads used by the Project?

The analysis area includes the Project area and a 2-mile buffer to evaluate potential impacts to access from road delays during access road improvements.

3.4.2.1 Affected Environment

No special recreation management areas are located within the analysis area; instead, the Project is within the Extensive Recreational Management Area, which lacks focused, specific recreation management (BLM 2025a). The nearest special recreational management area is the Chemehuevi Valley Rock Collecting and Touring special recreation management area, which is located approximately 49 miles northwest of the Project. The Project area is also partially within the prescribed recreational setting of "rural natural" that exhibits a low concentration of users mostly associated with dispersed recreational activities (BLM 2006).

The Project is located approximately 1.3 miles southwest of the 25,050-acre Harcuvar Mountain Wilderness Area, which provides primitive recreation opportunities such as hiking, horseback riding, backpacking, climbing, wildlife viewing, and hunting (BLM 2025b). Existing access to the Project area is provided by Alamo Road, the primary access route to Alamo Lake State Park from Hwy 60.

The Project is within the Arizona Game Management Unit 44A (AZGFD 2022b). Species in this unit open to hunting include bighorn sheep, elk (*Cervus canadensis*), mule deer, javelina (*Tayassu tajacu*), dove (*Zenaida asiatica*), and quail (*Callipepla gambelii)*. Camping is also permitted throughout the unit on BLM-administered lands (AZGFD 2022a).

There are no BLM-designated OHV areas within the analysis area (BLM 2025a); however, the Arizona Desert Rider OHV Club is used by OHV riders to connect to a trail that runs along the existing WAPA transmission corridor. Access to this trail and areas north and east of the Project is provided via Low Mountain Road and 77th Street. These unpaved, two-track roads would be improved, along with Rattlesnake Road and Unnamed Road 1 (Figure 2-2).

3.4.2.2 Environmental Consequences

Proposed Action. Public access to roads proposed for use during construction/decommissioning activities may undergo temporary and intermittent delays, particularly during periods of road improvements. However, EAGL would ensure that access would not be obstructed or closed. Delays would be temporary and expected during road improvement activities and equipment deliveries, but would subside upon completion of those improvements. While improved road conditions could result in increased public use, this may lead to adverse effects, including degradation of road surfaces and indirect effects such as an increased potential for litter accumulation and fugitive dust. Conversely, improved access could provide a beneficial effect by increasing public opportunities for recreational use within the area.

EAGL met with the Arizona Desert Rider OHV Club president on several occasions to discuss the proposed project. EAGL confirmed there would be no long-term impacts to Low Mountain Road, just possible short-term delays and only during construction. The club president acknowledged the proposed action would not prohibit continued use of the local trails for OHV recreation (personal communications).

No Action Alternative. Under the No Action Alternative, access to existing roads would remain unchanged because Project development would not occur. As a result, no improvements to existing unpaved, two-track roads would be implemented, and no associated public benefit from road improvements would occur.

3.4.3 Issue 3: How would the Proposed Action impact local employment, the economy, services, and quality of life for communities?

The socioeconomic analysis incorporated data from the U.S. Census Bureau (USCB 2025), U.S. Bureau of Economic Analysis (BEA 2025), and the University of Arizona Eller College of Management's Economic and Business Research Center (EBRC 2025). The analysis area is La Paz County, Arizona, with a total population of 16,605 as of 2023 (USCB 2023).

3.4.3.1 Affected Environment

The closest communities to the Project include the following census-designated places: Wenden, population 412; Salome, population 731; and Vicksburg, population 628 (USCB 2023). The Phoenix Metropolitan Area (population 5.1 million as of 2023) is located approximately 60 miles from the project in Maricopa County (USCB 2023). As of March 2025, the unemployment rate in La Paz County was 6.5 percent compared to a state average of 4.1 percent (EBRC 2025). Within the analysis area, there are an estimated 13,653 housing units, approximately 35 percent of which are vacant. Gross domestic product in the analysis area is dominated by private industries ($658 million; 77 percent). The highest-grossing industries include finance, insurance, real estate, rental, and leasing ($154 million; 18 percent), and retail trade ($147 million; 17 percent) (BEA 2023a). By comparison, the national gross domestic product overall is also dominated by private industries ($24.6 trillion; 89 percent), with the highest grossing industries including finance, insurance, real estate, rental, and leasing ($5.8 trillion; 21 percent), and professional and business services ($3.6 trillion; 13 percent) (BEA 2023b).

3.4.3.2 Environmental Consequences

Proposed Action. The Proposed Action would generate beneficial impacts through increased employment opportunities and direct, indirect, and induced spending in the local and regional economy. There would be an on-site construction workforce of 50 workers on average, with a peak of up to 75 jobs at any given time over the 6- to 12-month construction period.

Due to the temporary nature of construction, the Project would be unlikely to cause the socioeconomic analysis area to experience population growth from employees permanently relocating to the area. Workers who may need to temporarily relocate would likely reside in hotel accommodations or short-term rentals and patronize services near the Project. Several RV parks and motels are located along US-60 near the Project. Such activity would generate short-term economic benefits in nearby communities from increased spending on supplies, food, and other expenditures. Due to its close proximity, a number of workers would also be expected to commute daily from the Phoenix Metropolitan Area, but may still spend money in the analysis area, further benefiting the local economy.

Because the Project would be partially on previously disturbed and undeveloped BLM-administered land, the Project would not displace existing sources of employment or revenue-generating uses, such as agriculture. During operations, no positive socioeconomic impact is anticipated, as no full-time employees are required. Operational trips to the Project would be for routine equipment maintenance, semi-annual and annual inspections, repair and replacement

of equipment, vegetation management, and site security and management. This level of employment would not result in notable direct or indirect impacts on local housing markets, social services, and overall income and employment statistics. Decommissioning activities are anticipated to employ up to 35 workers on average and would result in similar but fewer employment and spending benefits within the analysis area than construction.

No Action Alternative. Under the No Action Alternative, the BLM would not offer a ROW grant, and WAPA would deny the interconnection request. There would be no short-term socioeconomic benefits locally or regionally.

3.4.4 Issue 4: How would surface disturbance from the Proposed Action contribute to soil compaction and erosion?

The analysis area for soils is the Project area plus a 100-foot buffer, totaling approximately 955 acres, to account for indirect effects of the Project.

3.4.4.1 Affected Environment

The analysis area consists of the soil types in Table 3-2. Soils in the analysis area exhibit an aridic moisture regime, are excessively drained to well-drained, allowing water to pass through quickly and indicating permeability, and are predominantly loamy or sandy.

Table 3-2. Natural Resources Conservation Service Soils within the Analysis Area

Soil Unit Number	Soil Unit Name	Acres in Analysis Area	Percent of Analysis Area
220	Momoli-Carrizo family complex, 1 to 5 percent slopes	110	12
252	Brios gravelly coarse sand, 0 to 5 percent slopes	78	9
275	Denure-Rillito-Pahaka complex, 0 to 1 percent slopes	303	32
330	Gunsight-Rillito complex, 1 to 10 percent slopes	122	13
615	Cellar-Hulda family-Rock outcrop complex, 5 to 90 percent slopes	2	< 1
620	Ajo-Hickiwan-Gunsight complex, 1 to 15 percent slopes	340	36
	Total	**955**	**100**

Source: NRCS 2024

Soils on steep slopes (a gradient of at least 10 percent) may be prone to destabilization and erosion when disturbed by wind, precipitation, or human activity. Because most of the analysis area is mostly characterized by slope gradients less than 15 percent, the analysis area is not vulnerable to slope erosion.

Soil compaction occurs when soil particles are pressed together more closely relative to their original state. Compaction prevents water and air from infiltrating and percolating through the soil, hindering the soil's ability to hold water. Over the long-term, the decreased porosity and permeability lead to increased runoff and increased soil erosion (NRCS 2003). These changes

may affect plant growth because they create unfavorable conditions for root penetration and the storage of nutrients, air, and water (NRCS 2024).

Approximately 80 percent of the analysis area soils are susceptibility to compaction. However, because soil saturation influences compaction, the estimated soil infiltration rate can be used to approximate susceptibility to compaction in wet conditions. The U.S. Department of Agriculture Natural Resources Conservation Service created hydrologic soil groups based on estimates of runoff potential. The analysis area is dominated by soils that have a high infiltration rate, indicating that the analysis area is unlikely to be susceptible to compaction following precipitation events (NRCS 2024).

Wind erosion is an important geomorphologic process in desert environments (Belnap 2006). Soils are placed in wind erodibility groups to indicate their susceptibility to erosion by wind. Wind erodibility groups are numbered from 1 to 8, with group 1 being the most susceptible to wind erosion and group 8 being the least susceptible. One soil map unit within the analysis area is assigned to the wind erodibility group 3, Denure-Rillito-Pahaka complex, 0 to 1 percent slopes (32 percent), indicating susceptibility to wind erosion. Approximately 68 percent of soils in the analysis area are classified as wind erodibility group 5 (Momoli-Carrizo family complex, 1 to 5 percent slopes and Brios gravelly coarse sand, 0 to 5 percent slopes) and 8 (Gunsight-Rillito complex, 1 to 10 percent slopes, Cellar-Hulda family-Rock outcrop complex, 5 to 90 percent slopes, and Ajo-Hickiwan-Gunsight complex, 1 to 15 percent slopes), meaning they are the least vulnerable to wind erosion (NRCS 2024).

3.4.4.2 Environmental Consequences

Proposed Action. Under the Proposed Action, soils would be disturbed during construction, O&M, and decommissioning activities. Long-term impacts to soils would occur in areas that were graded or excavated, such as structures or new access roads (up to 46 acres). Site grading and clearing would remove the topsoil layer and up to 12 inches of soil, including vegetation and its root structure. Excavation and trenching would disturb soils up to depths of approximately 10 feet. Surface-disturbing construction activities would degrade soils through a loss of vegetation and topsoil, mixing of soil horizons, and disturbance of soil crusts, resulting in increased vulnerability to wind and water erosion.

The upper soil of the surface would be disturbed within areas undergoing short-term disturbance (up to 57 acres), including staging areas and pull pockets. Following construction, short-term disturbed areas would be stabilized and seeded.

Impacts on soils during O&M would be more limited and primarily occur along facility access roads and the transmission line access road. Vegetation treatments and pest control would be carried out according to the Integrated Vegetation, Weed, and Pest Management Plan. Because vegetation treatments would likely be limited to mowing (firebreak) and the application of herbicides, no extensive removal of vegetation or root matter would occur or contribute to further soil erosion.

The Applicant would implement design features and BMPs along with sediment control measures to mitigate soil erosion and sediment transport throughout project activities. Stormwater controls such as detention basins, earthen swales, and culverts would mitigate soil erosion by water and minimize sediment transport to adjacent washes.

Impacts on soils during decommissioning would be similar to those described for construction; however, the impacts would be more limited, as decommissioning would occur largely on soils that have already been disturbed. Post-construction reclamation and erosion-control BMPs would be installed/monitored.

No Action Alternative. Soil resources would not be disturbed or otherwise affected under the No Action Alternative. Under this alternative, the BLM would not offer a ROW grant for the project and WAPA would not approve the interconnection request by the Applicant. Ongoing land uses such as transmission infrastructure maintenance, grazing, and OHV use would continue and could contribute to soil impacts in the analysis area.

3.4.5 Issue 5: How would the Proposed Action impact paleontological resources classified as Potential Fossil Yield Classification - unknown in the Project area?

The analysis area for paleontological resources is the Project area plus a 0.25-mile buffer, which, combined, measures approximately 3,784 acres and accounts for indirect effects of the Project.

3.4.5.1 Affected Environment

Paleontological resources are fossilized remains, traces, or imprints of organisms preserved in the earth's crust that are of paleontological interest and that provide information about the history of life on earth (Paleontological Resources Preservation Act of 2009, Section 6301: 16 United States Code 47aaa).

No fossil localities have been documented in the Project area, but fossil resources on the surface and in the subsurface potentially exist (Chronical Heritage 2025). To assess paleontological sensitivity, the Potential Fossil Yield Classification (PFYC) system was applied, which determines the sensitivity of geologic units based on the relative abundance and risk of adverse impacts to vertebrate fossils, plants, and invertebrates. The class values are 1 through 5, with higher class values indicating higher potential fossil presence, significance, and sensitivity to adverse impacts. Geological units that cannot be provided with an informed PFYC assignment receive an Unknown ("U") ranking. The PFYC rankings of 1 (very low), 2 (low), and U (Unknown) were assigned to the geological units present within the Project area (Chronical Heritage 2025). PFYC "U" locations within the analysis area are shown in Figure 3-1.

3.4.5.2 Environmental Consequences

Proposed Action. Up to 103 acres may undergo surface-disturbing activities (long-term disturbance to up to 46 acres and short-term disturbance up to 57 acres). Of this, approximately 34 acres occur within PFYC-U areas, which account for approximately 2 percent of the analysis area (approximately 1,421 acres). Therefore, Project activities have a low potential to impact paleontological resources within the PFYC-U areas, if encountered.

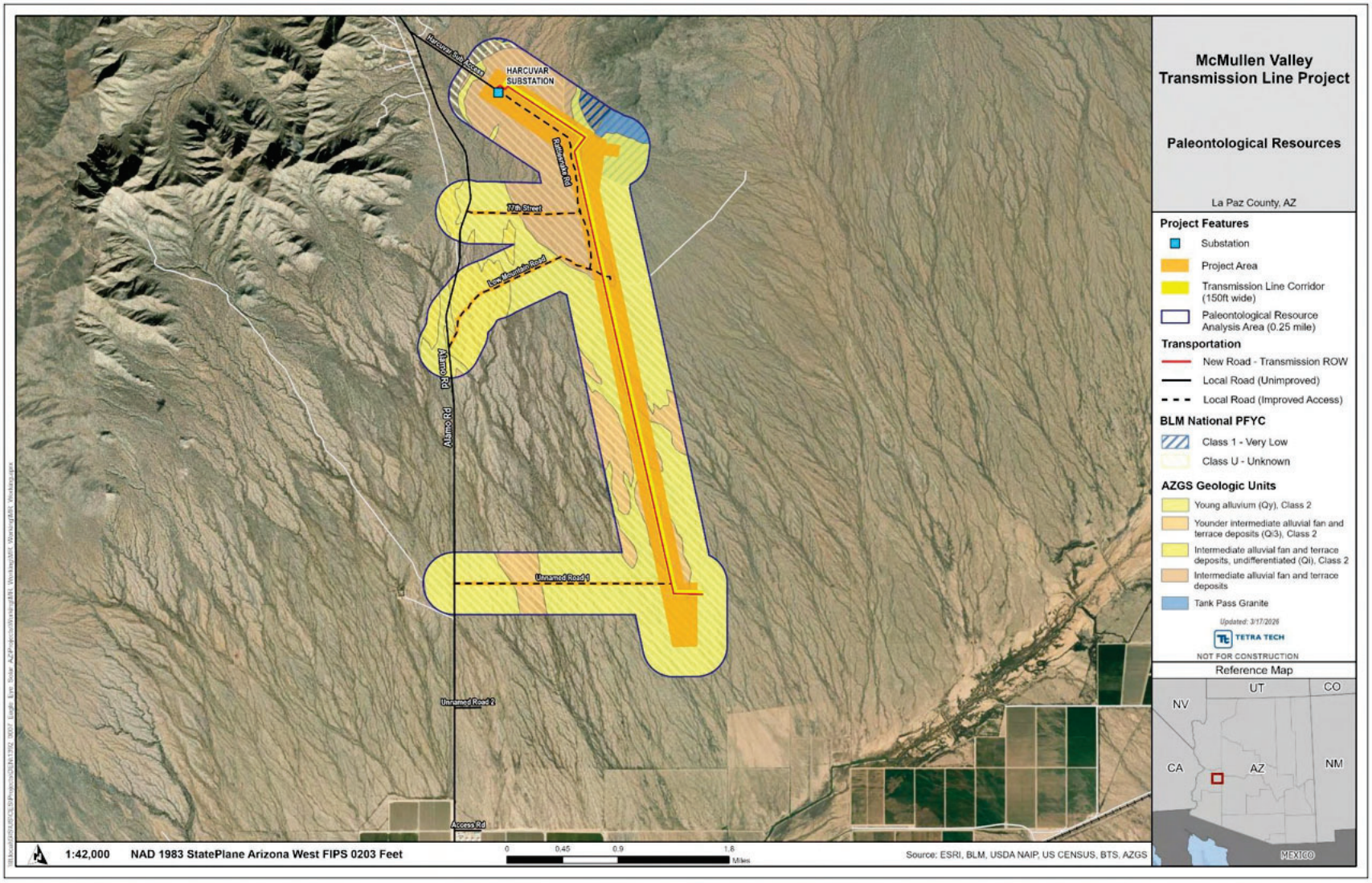

Figure 3-1. Potential Fossil Yield Classification Locations within the Analysis Area

Impacts to paleontological resources during excavation include direct and often destructive removal of in-place resources. Surface and near-surface resources may also be impacted during shallower surface-disturbing activities. Surface-disturbing activities can exacerbate natural erosion processes, which can indirectly result in the potential exposure of surface and near-surface paleontological resources, increasing the likelihood of discovery. Fossils may become damaged or lost by the direct action of ground disturbance, subsequent erosion, and unauthorized collection. Potential impacts to paleontological resources within PFYC-U areas during construction would be minimized through the worker environmental awareness program training for site workers, monitoring during ground-disturbing activities, and implementation of an Unanticipated Discovery Plan.

No new surface disturbance or impacts to paleontological resources are expected during operations. Any decommissioning disturbance would remain within previously disturbed areas.

No Action Alternative. Under the No Action Alternative, no surface-disturbing activities would occur from the project that have the potential to impact the PFYC-U areas. The BLM would not offer a ROW grant, and WAPA would deny the interconnection request. Existing land uses, including transmission infrastructure maintenance, OHV use, and cattle grazing, have the potential to affect paleontological resources in areas designated as PFYC-U in the analysis area.

3.4.6 Issue 6: How would construction, operations and maintenance, and decommissioning activities impact existing range improvements within the area of the Proposed Action?

The analysis area for rangeland improvement is the overlap of the Project area with rangeland improvements within the 37,317-acre Babcock #03006 Grazing Allotment.

3.4.6.1 Affected Environment

Range improvements that overlap with the Project area and are located within the Babcock Grazing Allotment are listed in Table 3-3.

Table 3-3. Range Improvements in the Analysis Area

Improvement Name	Location	Description
Well	T7N, R12W, Sec 29	Stock watering well #55-624712, drilled 1967, 35 gallons per minute
Corrals	T7N, R12W, Sec 29	Wood corrals, 345.50 linear feet
Spring / Tank	T7N, R12W, Sec 28	Dirt reservoir
And Han Fence	T6N, R12W, Sec 9 & 10	Barbed wire fencing runs horizontally through the Project area for 1,008 linear feet or 0.19 miles; total length is 8,465 linear feet or approximately 1.60 miles

3.4.6.2 Environmental Consequences

Proposed Action. EAGL does not anticipate impacts on the existing well, corral, or spring/tank as these features would be avoided under the Proposed Action. However, the Proposed Action could result in impacts to the And Han Fence. Although no fencing would be permanently removed under the Proposed Action, EAGL would coordinate with the future allottee(s) or owner and the BLM to address concerns and repair the fence and/or implement mitigation, as necessary.

No Action Alternative. No range improvements would be removed or repaired under the No Action Alternative, and grazing would resume once the BLM issues a new allotment.

3.4.7 Issue 7: How would the Proposed Action impact forage availability within the Babcock grazing allotment?

The LHFO RMP identifies lands that are available or unavailable for grazing and are managed by the BLM grazing program. The analysis area for livestock grazing is the 37,317-acre Babcock Grazing Allotment (#03006), which overlaps a portion of the Project area (Figure 3-2).

3.4.7.1 Affected Environment

The allotment was previously authorized for 115 cattle yearlong in an amount of 1,007 animal unit months (AUMs) (BLM 2014). There are no active permits/leases issued for this allotment.

3.4.7.2 Environmental Consequences

Proposed Action. Up to 103 acres of the Project area would undergo surface disturbance, which would result in the loss of approximately 2.8 AUMs. Up to an additional 2 acres (less than 0.1 AUMs) would be fenced to accommodate the expansion at Harcuvar Substation and would preclude livestock grazing. The Proposed Action would result in a less than one percent reduction in available lands within the Babcock allotment that would be available for grazing. The Applicant would compensate the future grazing permittee(s) for the removed animal unit months.

No Action Alternative. Under the No Action Alternative, no AUMs would be removed, and the BLM would potentially issue new grazing permits.

3.4.8 Issue 8: How would construction, operations and maintenance, and decommissioning of the Project affect migrating or dispersing southwestern willow flycatchers?

The analysis area for southwestern willow flycatchers (*Empidonax traillii extimus*) includes the Project area and a 1-mile buffer totaling approximately 12,974 acres to account for displacement into adjacent habitat.

3.4.8.1 Affected Environment

The southwestern willow flycatcher (SWFL) is federally listed as endangered by the USFWS and has the potential to occur according to the USFWS Information for Planning and Consultation report (USFWS 2025).

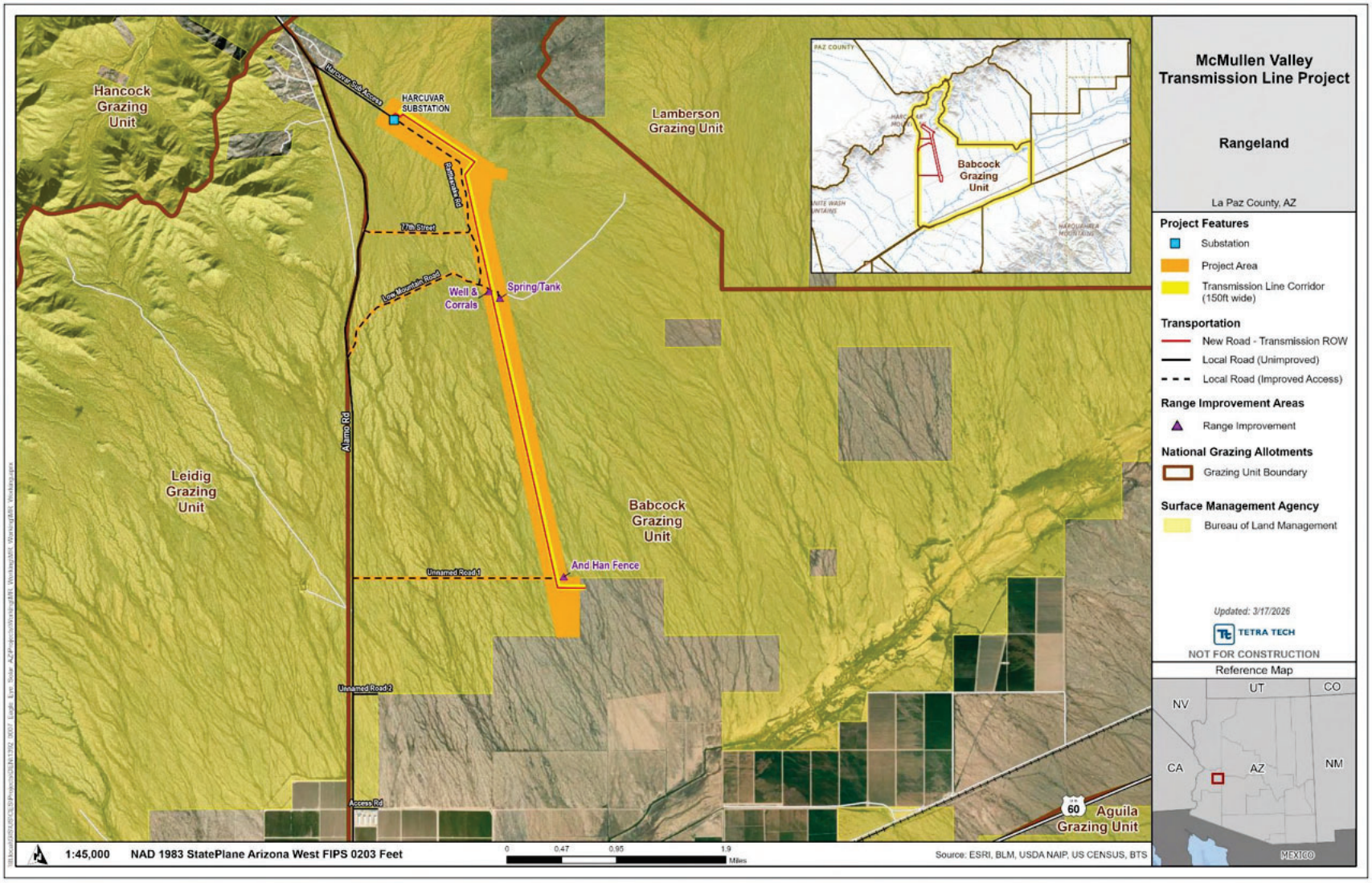

Figure 3-2. Babcock Grazing Allotment

The species breeds in dense riparian habitats where surface water is present or where soil moisture is high enough to maintain the appropriate vegetation characteristics (USFWS 2002). In Arizona, the largest breeding populations have been observed near the San Pedro-Gila River confluence; at the Salt River and Tonto Creek inflows to Roosevelt Lake; Big Sandy River, Wikieup; the Gila River and Safford; the Verde River, Horseshoe Lake; Topock Marsh; and Alamo Lake (Durst et al. 2006). This species is a nocturnal migrant (Finch and Stoleson 2000). Primary threats to the SWFL include habitat loss, fragmentation, and modification (e.g., water management, land use practices); increasing populations of nuisance species (e.g., brown-headed cowbird [*Molothrus ater*]) and non-native species (e.g., non-native weeds, tamarisk leaf beetle [*Diorhabda carinulata* and *D. sublineata*]); migration and winter range stresses; and climate change (e.g., drought, increased wildfire occurrence) (USFWS 2002).

3.4.8.2 Environmental Consequence

Proposed Action. The Project area does not provide suitable habitat for the SWFL but could provide marginal foraging habitat for migrants. The Proposed Action would disturb up to 103 acres, which accounts for less than 1 percent of the analysis area. Potential effects on SWFL from the Proposed Action would primarily result from loss of marginal migratory stopover habitat and collisions with the transmission line and expanded substations. The removal of potential stopover habitat could increase energy expenditure for migrating SWFLs, who would have to find alternative stopover habitat, likely adjacent to the Project. Individuals are expected to relocate to abundant, similar habitats nearby, resulting in marginal impacts. Although there is a potential risk of injury or mortality to SWFLs from collisions with the overhead transmission line, expanded substations and their fences, and subsequent predation, this risk is considered unlikely due to the lack of habitat and low likelihood of occurrence.

No Action Alternative. Under the No Action Alternative, no habitat would be disturbed or removed; therefore, no impacts to SWFL would occur. Existing conditions, however — including intermittent OHV use, livestock grazing, and the potential for additional infrastructure development in adjacent utility corridors — would continue to exert habitat pressures that could affect migrants.

3.4.9 Issue 9: How would construction, operations and maintenance, and decommissioning of the Project affect migrating western yellow-billed cuckoos?

The analysis area for the western yellow-billed cuckoo (WYBC; *Coccyzus americanus*) includes the Project area and a 1-mile buffer totaling approximately 12,974 acres to account for displacement into adjacent habitat.

3.4.9.1 Affected Environment

The WYBC is federally listed as threatened by the USFWS and has the potential to occur according to the USFWS Information for Planning and Consultation report (USFWS 2025).

In the arid southwest, WYBCs are primarily restricted to dense, multi-structured native riparian woodlands along rivers and streams, and damp thickets with high humidity at elevations less than 6,600 feet above mean sea level (AZGFD 2022a; Corman 2005). In Arizona, WYBCs have often been observed nesting along intermittent drainages with dense stands of velvet mesquite (*Prosopis velutina*) and netleaf hackberry (*Celtis reticulata*) (AZGFD 2022a; Corman 2005). The WYBC is a long-distance, nocturnal migrant, though its migration routes are poorly understood

(Daw 2014). Research indicates that the San Pedro River and the Lower Colorado River and its tributaries are important migratory corridors for this species (Halterman et al. 2009). Suitable migratory stopover habitat includes areas of Sonoran riparian deciduous forest, cottonwood-willow series, and Sonoran riparian scrub that are less well-developed than breeding habitat (AZGFD 2022a). Habitat loss, fragmentation, and degradation have been identified as the primary cause of WYBCs' decline in the western United States (USFWS 2014).

3.4.9.2 Environmental Consequence

Proposed Action. The Project area does not provide suitable habitat for the WYBC but could provide marginal foraging habitat for migrants. Impacts from the removal of marginal foraging habitat and collisions would be the same as described for SWFL.

No Action Alternative. Under the No Action Alternative, no habitat would be disturbed or removed; therefore, no impacts to WYBC would occur. However, ongoing occasional OHV use, livestock grazing, and the potential for future infrastructure development associated with nearby utility corridors would continue to pose habitat pressures that could affect migrating individuals.

3.4.10 Issue 10: How would construction, operations and maintenance, and decommissioning of the Project affect the Sonoran Desert tortoise and its habitat?

The analysis area for the Sonoran Desert tortoise is the Project area and a 2-mile buffer (approximately 32,539 acres).

3.4.10.1 Affected Environment

The Sonoran Desert tortoise (SDT), a BLM sensitive species, is protected under a Candidate Conservation Agreement, a voluntary agreement between the USFWS and parties (BLM) to address conservation needs (USFWS and AIDTT 2015). The species was petitioned for ESA listing; however, in 2022, the USFWS determined that listing was not warranted (87 Federal Register 7077).

SDTs are found in the Mojave and Sonoran desert-scrub biotic communities, south and east of the Colorado River. It primarily inhabits rocky slopes and bajadas, but may also be found in low densities in intermountain valleys (USFWS 2021). This species burrows in loose soil and beneath rocks, boulders, and shrubs. SDTs also find shelter under vegetation and in caliche caves, most commonly in association with paloverde and mixed cacti. Forage includes annual and perennial grasses, forbs, succulents, trees and shrubs, and woody vines (AZGFD 2022a; USFWS 2021).

SDT habitat has been classified by the BLM Sonoran Desert Tortoise Rangewide Plan and ranked according to four criteria: 1) importance of the habitat to maintaining viable populations; 2) resolvability of conflicts; 3) tortoise density; and 4) population status (stable, increasing, or decreasing) (Spang et al. 1988). Category 1 represents the highest priority habitat, while Category 3 is the lowest priority. Within the analysis area, approximately 7,819 acres are mapped as Category 1 SDT habitat, which overlaps with the northern portion of the transmission line corridor and its interconnection into the existing Harcuvar Substation. Approximately 10,367 acres are mapped as Category 3 habitat, which overlaps with the middle portion of the transmission line corridor (Figure 3-3).

Surveys following the *Survey Guidelines for Environmental Consultants* (BLM 2007c) observed one SDT within the Project area. A total of 5 potential burrows, classified as Class 4 and 5, were identified (Tetra Tech 2024c, 2025b). There was also a potential sign, scat, although not definitively tortoise, that was observed adjacent to and outside the transmission line corridor (Figure 3-3).

3.4.10.2 Environmental Consequence

The Proposed Action would disturb up to 103 acres of vegetation during construction. Potential impacts to the SDT from Project construction include habitat loss and direct mortality due to equipment and vehicle activity. A 15-mile-per-hour speed limit for dust control purposes would help minimize direct hits. The Proposed Action would result in long-term loss of up to 4 acres of Category 1 SDT habitat associated with the construction of the northern portion of the transmission line, access road, and substation, or less than 1 percent within the analysis area. Up to 13 acres of Category 3 habitat would be removed over the long term due to the construction of the southern portion of the transmission line, associated access road, and improvements to Project access roads. This accounts for less than one percent of the analysis area.

Approximately 9 acres of Category 1 habitat and 10 acres of Category 3 habitat would undergo short-term disturbance to accommodate the transmission line staging areas and pull pockets (less than one percent of the analysis area), but would be restored following construction. The transmission line and substation fencing could also provide perching opportunities for ravens and other predators. Design features implemented under Section 2.1.5.1 would reduce potential impacts on the SDT.

SDT burrows would be avoided during construction to the maximum extent feasible. To minimize impacts, pre-construction surveys would be completed ahead of construction. The Applicant would coordinate with the BLM if relocation of individuals is required, utilizing *Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects* (AZGFD 2007). Construction activities would be monitored by a qualified desert tortoise biologist who would watch for tortoises wandering into construction areas, check under vehicles, check any excavations, pipes, or similar structures that might trap tortoises, and conduct other activities necessary to ensure that the death and injury of tortoises is minimized. Worker environmental awareness program training would include information related to the tortoise to aid in worker identification and the minimization of potential impacts to the species. The Applicant would adhere to the Arizona Interagency Desert Tortoise Team's *Mitigation Measures for Projects in Sonoran Desert Tortoise* Habitat, as applicable (AIDTT 2008).

No habitat disturbance is anticipated during operation and maintenance activities. Potential impacts to desert tortoises could occur through direct interaction with vehicles or equipment. To minimize potential effects, speed limits of 15 miles per hour would be observed. Impacts associated with decommissioning activities are expected to be similar in nature and magnitude to those occurring during operation and maintenance.

No Action Alternative. Under the No Action Alternative, the Project would not be developed, so no effects on SDT would occur. The BLM would not offer a ROW grant, and WAPA would deny the interconnection request. Potential impacts from current land uses would continue unchanged and may exert habitat pressures on SDT.

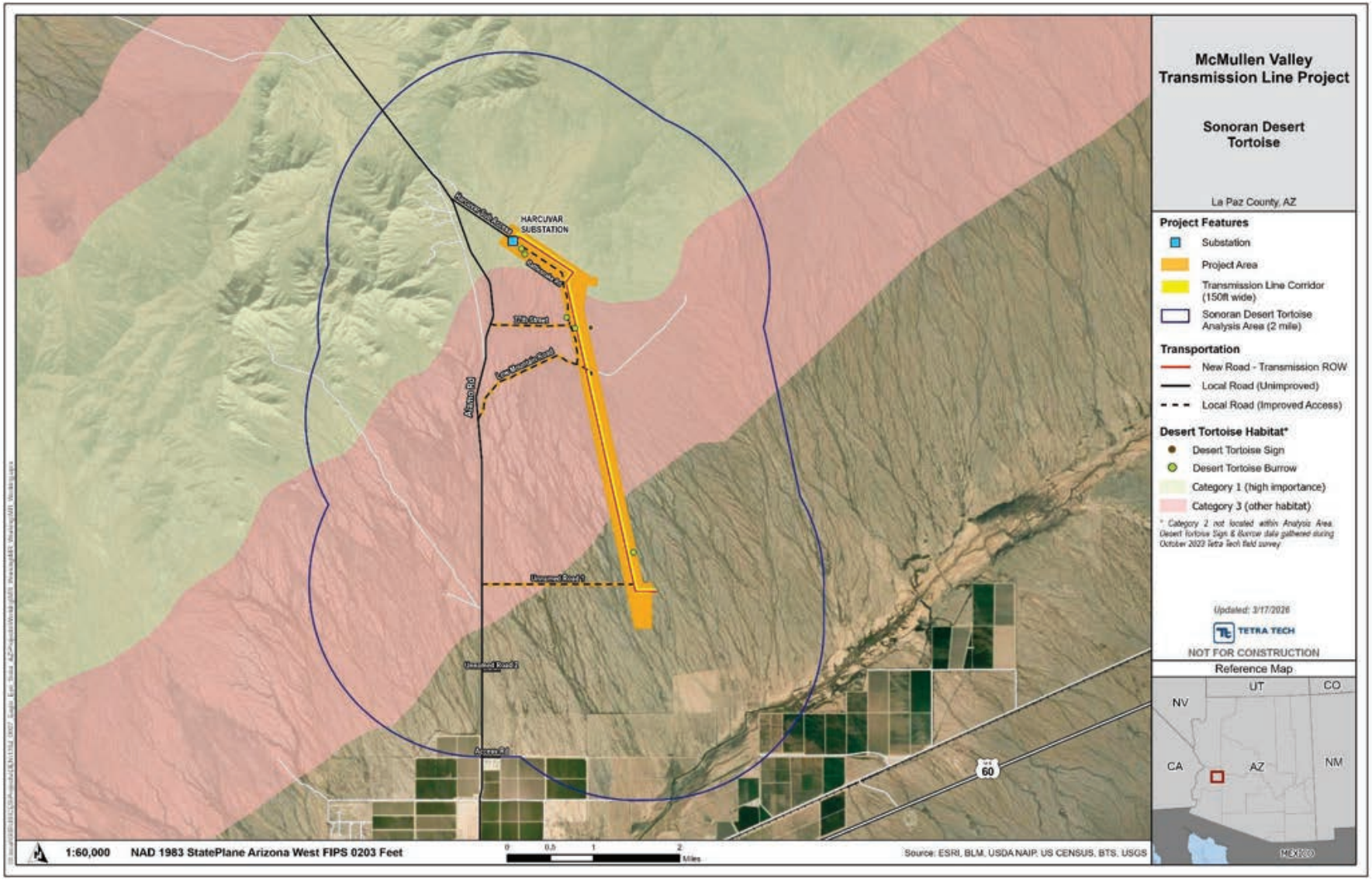

Figure 3-3. Sonoran Desert Tortoise Category Habitats

Appendix A

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Appendix B

Consultation, Coordination, and Public Involvement

Appendix B. Consultation, Coordination, and Public Involvement

Introduction

This chapter summarizes the consultation and coordination efforts completed for the Project with interested agencies, organizations, Tribes, and individuals.

Scoping

No external scoping took place. Both WAPA and BLM, including a BLM interdisciplinary team of BLM resource specialists, reviewed the proposed Project and identified issues. The BLM also notified adjacent ROW grant holders of the pending request from the EAGL for a new ROW request to construct, operate, maintain, and upgrade or eventually decommission the proposed transmission line.

Consultation and Coordination with Agencies, Tribal Governments, and Stakeholders

Consultation and coordination efforts will continue through the NEPA process.

Table D-3. Cooperating Agencies List

Agency Type	Agency
Federal	
	Western Area Power Administration
Tribal	
	Ak-Chin Indian Community
	Chemehuevi Indian Tribe
	Cocopah Indian Tribe
	Colorado River Indian Tribe
	Fort McDowell Yavapai Nation
	Fort Mojave Indian Tribe
	Fort Yuma Quechan Tribe
	Gila River Indian Community
	Hopi Tribe of Arizona
	Mescalero Apache Tribe
	Moapa Band of Paiute Indians
	Pueblo of Zuni
	Salt River Pima-Maricopa Indian Community
	Tohono O'odham Nation
	Yavapai Apache Nation
	Yavapai-Prescott Indian Tribe

Tribal Government-to-Government Consultation

The BLM will continue to conduct Government-to-Government consultation throughout the NEPA process with Native American Tribes.

National Historic Preservation Act Section 106

Section 106 (54 United States Code 306108) of the National Historic Preservation Act requires federal agencies to consider the effects of their undertakings. Consultation is ongoing.

The regulations also specify the need for meaningful consultation with Tribal and State Historic Preservation Offices, Native American Tribes, and other interested parties during all phases of National Historic Preservation Act Section 106 compliance. Tribal consultation is ongoing.

U.S. Fish and Wildlife Service Section 7 Consultation

The USFWS has jurisdiction over threatened and endangered species listed under the ESA (16 United States Code 1531 et seq.). Informal consultation with the USFWS under Section 7 of the ESA is required for any federal action that may adversely affect a federally listed species. Consultation is ongoing.

List of Preparers and Reviewers

The preparers and reviewers of this EA are listed in Table D-4.

Table D-4. List of Preparers and Reviewers

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EXHIBIT B-2
MCMULLEN VALLEY TRANSMISSION PROJECT
PLAN OF DEVELOPMENT

Plan of Development

McMullen Valley Transmission Project

BLM Serial Number: AZAZXXXXXXXXX

January 15, 2026

Prepared for

Bureau of Land Management
Lake Havasu Field Office
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Acronyms and Abbreviations

Applicant	EAGL, LLC
Application Area	Requested U.S. Bureau of Land Management rights-of-way for a 740-acre area
AZGFD	Arizona Game and Fish Department
BETH	Bendire's thrasher (*Toxostoma bendirei)*
BLM	Bureau of Land Management
BMP	best management practice
BrightNight	BrightNight, LLC
EAGL, LLC	Applicant; a subsidiary of BNC DEVCO, LLC
gen-tie	generation tie-in transmission line
GIP	Global Infrastructure Partners
GW	Gigawatt
IPaC	Information for Planning and Consultation
KOP	Key observation point
kV	kilovolt
LCTH	LeConte's thrasher (*Toxostoma lecontei)*
LOSH	Loggerhead shrike (*Lanius ludovicianus)*
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
OHV	off-highway vehicle
POD	Plan of Development
Project	McMullen Valley Transmission Project
project area	740-acre area
Project footprint	86.8 acres for Project facilities on BLM-administered lands
RMP	Resource Management Plan
ROW	right-of-way
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VRM	Visual Resource Management
WAPA	Western Area Power Administration

1.0 INTRODUCTION

1.1 Project Summary

EAGL, LLC (Applicant), a subsidiary of BNC DEVCO, LLC, submitted an *Application for Transportation and Utility Systems and Facilities on Federal Lands* (Standard Form 299) to the U.S. Bureau of Land Management (BLM) Lake Havasu Field Office for a right-of-way (ROW) grant for a 740-acre Application Area (or project area) needed to construct, operate, maintain, and decommission a single-circuit 230-kilovolt (kV) generation tie-in transmission line (gen-tie) and associated facilities, also referred to as the McMullen Valley Transmission Project and herein referred to as the "Project" or "Proposed Action." BrightNight U.S. LLC ("BrightNight") is an affiliate of BNC DEVCO and is the lead developer of the Project. The Project is expected to support interconnection to a planned energy center, which is expected to include one or more generating resources and/or a data center or industrial load.

The proposed Project will help to meet the broader system-wide increase in electricity demand across Arizona. The state is experiencing unprecedented load growth, with each of the state's major utilities forecasting electrical demand to grow by 50 percent or more over the course of the next decade. To keep Arizona's economy strong and maintain national and regional energy reliability, along with maintaining affordable supply for public power entities, new power resources must be added to serve the grid, along with the transmission infrastructure required to deliver them.

In response to this demand, BrightNight is submitting applications for approval for the above-mentioned power resources located on non-BLM land through a conditional use permit in La Paz County to be filed in January 2026 and a certificate of environmental compatibility (CEC) through the Arizona Corporation Commission. The CEC hearing date is reserved for August 2026.

Separately, to connect the power resources needed to power the state's economy and develop this economic opportunity, EAGL, LLC is proposing to construct a new, 6-mile single-circuit 230-kV gen-tie line within a 150-foot ROW on and across BLM-administered land, which would connect a new substation on private land to the existing Western Area Power Administration (WAPA) Harcuvar Substation (see Figure 1). The transmission gen-tie is the focus of this filing and Plan of Development (POD).

The existing Harcuvar 230-kV Substation will require expansion to accommodate the interconnection, as well as minor equipment upgrades to two other WAPA substations. The interconnection and new substation on private land will facilitate the delivery of electric power between the McMullen Valley Transmission Project and WAPA's Desert Southwest Region System. The Project is located approximately 3 miles north of Wenden and approximately 100 miles west of Phoenix in La Paz County, Arizona (Figure 1).

This POD provides an overview of the Project, and information from this POD will be incorporated into the National Environmental Policy Act analysis for the Project to meet BLM's requirements. It includes a general description of the design, construction, operation, maintenance, and decommissioning or renewal of the Project. It also provides detailed information on the proposed Project facilities, procedures, and measures that EAGL, LLC will implement during the various Project phases. EAGL, LLC would construct and operate the Project in conformity with this POD, which was included as part of the ROW application.

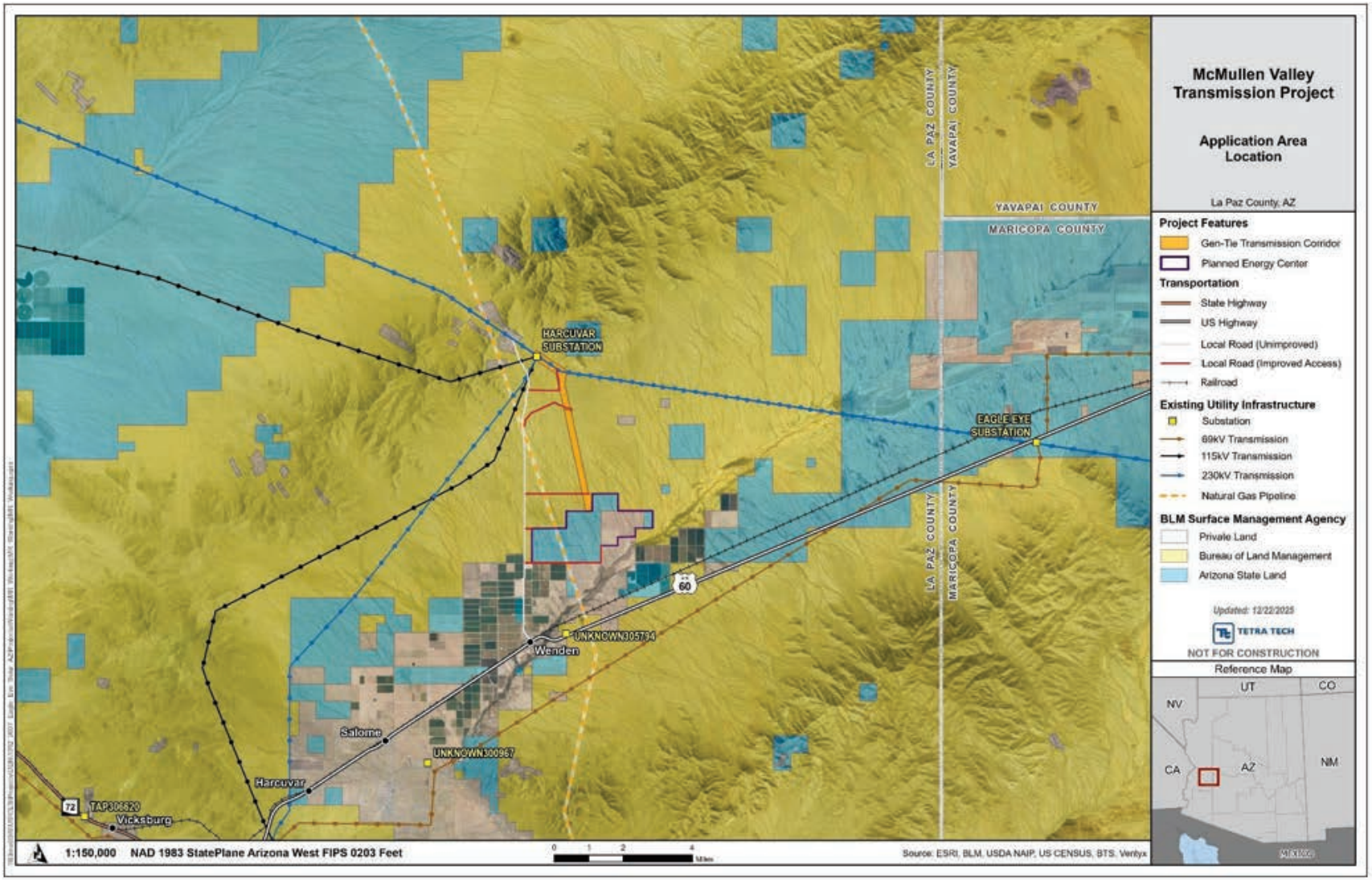

Figure 1. Application Area Location

1.2 Project Description

EAGL, LLC proposes to construct, operate, maintain, and either decommission or renew up to 6 miles of single circuit, 230-kV overhead electric gen-tie line from a new substation on private land to the existing WAPA Harcuvar Substation in west-central Arizona. The new gen-tie line would leave private inholdings and proceed west onto BLM-administered land for approximately 0.5 mile, then turn north-northwest for 4.1 miles, then turn west-northwest for 1.1 miles and connect with Harcuvar Substation. The Project would increase WAPA's transmission capacity to meet the electrical demand in the Desert Southwest Region.

The Project requires the establishment of a long-term, 150-foot-wide ROW for the gen-tie line, encompassing a total of 109 acres within the 740-acre Application Area. Within this ROW, existing roads will be used to the greatest extent possible in the northern portion; however, improvements to these roads and/or the construction of new spur roads are anticipated. A single two-track access road up to 25 feet wide will be constructed along the gen-tie route. Improvements will also be needed for the three existing access roads (Unnamed Road 1, Low Mountain Road, and 77th Street) to facilitate access to the ROW during construction, as well as for ongoing maintenance and decommissioning activities. Improvements will also be needed to two additional existing access roads (Access Road and Unnamed Road 2) for access to the future planned energy center.

To facilitate the interconnection of the Project, the existing WAPA-owned Harcuvar Substation will be expanded by up to 2 acres. In contrast, upgrades to the existing Parker and Davis 230-kV substations will be limited to their current footprints. Once construction is completed, EAGL, LLC will coordinate with the BLM to transfer the expansion area for Harcuvar Substation to WAPA.

Short-term workspaces will be required to support the construction of the Project and will be situated within the ROW and also extend beyond the ROW into the Application Area. Staging areas are proposed for the storage of materials and equipment and for the assembly of structures. Pull pockets are necessary to facilitate the safe construction of pulling and tensioning sites at angled structures. The construction phase of the Project is expected to take approximately 12-18 months to complete.

1.3 Need for the Project

As stated in the introduction, the State of Arizona is experiencing unprecedented load growth, with each of the state's major utilities forecasting electrical demand to grow by 50 percent or more over the course of the next decade. To keep Arizona's economy strong and to ensure continued energy dominance for the United States, new power resources must be added to serve the grid.

By approving this action, BLM would provide EAGL, LLC with the legal use of and access across BLM-managed public lands by granting a ROW. As stated in 43 Code of Federal Regulations 2801.9, a BLM ROW grant is required for use of public lands for "systems or facilities over, under, on, or through public lands," including gen-tie lines. The BLM's mandate for multiple uses of public lands includes the development of energy transmission in a manner that conserves the multitude of other resources found on public lands. The need for the BLM's action is established by the Federal Land Policy and Management Act and is to respond to an application for a ROW grant by evaluating the proponent's application for use of federal land for the construction of a 230-kV gen-tie line.

The Applicant's fundamental purpose of the Project is to enhance grid reliability and security through the supply of energy, capacity, and ancillary services to the power grid, and to keep Arizona's economy growing and our nation strong. Within WAPA's service territory, WAPA has experienced a substantial increase in electrical demand in western Arizona. This Project is needed to satisfy customer needs and reliability. The Project cost is estimated to be approximately $35 million ($15 million for the gen-tie and $20 million for the WAPA substation improvements). Construction of the Project is anticipated to be completed within 12-18 months.

1.4 Relationship to Statutes, Regulations, or Other Plans

Various federal and state agencies regulate different aspects of electric power transmission projects. Table 1 lists the environmental permits and approvals that could be required for the proposed Project.

Table 1. Potential Permits, Approvals, and Clearances Needed for Construction, Operation, Maintenance, and Decommissioning of Facilities

Permit/Notification	Issuing Agency	Status
Federal Permit, Approval, or Clearance		
ROW grant	BLM	Subject of the Standard Form 299 and National Environmental Policy Act compliance , being processed under BLM ROW serial number AZAZXXXXXXX.
Clean Water Act Section 404 Permit	U.S. Army Corps of Engineers (USACE)	Field investigations have been conducted to identify potential waters of the United States that would be impacted by the proposed Project. Findings are described in an aquatic resources report submitted under a separate cover (Tetra Tech 2024) and CX. No further consultation with the USACE is required[1,2].
Clean Water Act Section 402 Construction General (Stormwater) Permit	U.S. Environmental Protection Agency	The permit would be obtained prior to construction under the U.S. Environmental Protection Agency's Construction General Permit.
Clearance under Section 7 of the Endangered Species Act	U.S. Fish and Wildlife Service (USFWS)	A general biological survey was conducted. Findings are described in a biological resources assessment report submitted under separate cover (Tetra Tech Inc 2023) and the CX. No further consultation with the USFWS is required[3].
State Permit, Approval, or Clearance		
Certificate of Environmental Compatibility (CEC)	Arizona Corporation Commission	CEC permit for the construction of a 230-kV gen-tie line. CEC approval is *in progress*.
Air Quality Compliance Certification	Arizona Department of Environmental Quality	Construction activities producing new sources that exceed permitting thresholds.
Arizona Pollutant Discharge Elimination System (AZPDES) Construction Stormwater General Permit, 33 USC 1251 et seq.	Arizona Department of Environmental Quality	Construction activities that disturb 1 acre or more of land.

[1] Tetra Tech, Inc. 2024. Aquatic Resources Delineation Report, Eagle Eye 2 Project. December 2024. Prepared for BrightNight Power, LLC by Tetra Tech, Inc., Salt Lake City, Utah.
[2] USACE 2025. Email Correspondence.
[3] Tetra Tech, Inc. 2023. Biological Resources Assessment Report, Eagle Eye 2 Project. August 2023. Prepared for BrightNight Power, LLC by Tetra Tech, Inc., Salt Lake City, Utah.

Permit/Notification	Issuing Agency	Status
Consultation regarding impacts to wildlife	Arizona Game and Fish	Agency coordination regarding impacts to wildlife is recommended to meet the requirements of other federal/state permits.
Clearance under Section 106 of the National Historic Preservation Act	Arizona State Historic Preservation District	Cultural resources surveys were conducted. Findings are described in the cultural resources report (Tetra Tech 2025) and CX.
Tribal consultation to determine if the proposed Project would have any impact on receptors of cultural importance	Native American Tribes	Findings are described in a biological resources assessment report submitted under separate cover (Tetra Tech Inc 2023[4]) and the CX.

1.5 Financial and Technical Capability of Applicant

BrightNight is the lead developer for the Project. The Applicant is owned by BNC DEVCO, LLC.. BrightNight was formed on July 24, 2018, as a Limited Liability Company registered in the state of Delaware.

In December 2021, BrightNight closed a $500 million investment from Global Infrastructure Partners (GIP). GIP is a leading independent infrastructure fund manager that makes equity and debt investments in infrastructure assets and businesses. GIP's investment in BrightNight provides sufficient capital to fund the development of the company's 31+ gigawatt (GW) project pipeline. In December 2023, BrightNight raised a $375 million corporate credit facility of which $200 million is allocated for PPA LC postings. In August of 2024, BrightNight secured a $440 million equity investment by Goldman Sachs Alternatives and a $400 million corporate facility, providing the financial strength and resiliency to advance projects to completion even during uncertain market conditions.

1.5.1 About BrightNight

BrightNight develops, finances, constructs, and operates dispatchable energy power plants. BrightNight then sells and delivers the energy, capacity, other attributes and services, and/or the projects themselves to utilities, municipal load-serving entities, other electric retailers, and commercial and industrial customers in the United States. BrightNight' s focus is to provide the highest value to their customers by first understanding their needs and then employing best-in-class engineering, technology, and commercial solutions. BrightNight has built a U.S. portfolio that is over 20+ GW in size.

[4] Tetra Tech, Inc. 2025. Class III Cultural Resources Inventory, BrightNight Eagle Eye 2 Project, La Paz County, Arizona. Prepared for BrightNight Power, LLC by Tetra Tech, Inc., Lakewood, Colorado.

2.0 PROJECT OVERVIEW

The Project is approximately located at latitude 33.915703°/longitude -113.520964° (North American Datum 83) at an elevation of approximately 1,994 feet above mean sea level. The legal land description is listed below. Appendix A includes the legal land description based on the survey data (access roads are not included in the surveyor's legal land survey description) and the master title plat figure.

2.1 Legal Land Description

Gila-Salt River Meridian, La Paz County, Arizona

Generation Interconnection Tie-In Area Township, Range, Section

Township 7 North, Range 12 West
Section 17 S½SW¼
Section 20 N½NW¼, SE¼NW¼, W½NE¼, SE¼NE¼, E½SE¼, and NW¼SE¼
Section 21 SW¼NW¼ and NW¼SW¼
Section 28 W½SW¼, W½NW¼
Section 29 E½NE¼ and E½SE¼
Section 32 E½NE¼, E½SW¼
Section 33 W½ NW¼, W½SW¼

Township 6 North, Range 12 West
Section 4 SW¼NE¼, SE¼SW¼, E½SW¼, W½SE¼, and Lot 3
Section 9 W½NE¼ and NE¼NW¼

Access Roads Township, Range, Section

77th Street

Township 7 North, Range 12 West
Section 19 SE¼SE¼
Section 20 S½SW¼, S½SE½

Low Mountain Road

Township 7 North, Range 12 West
Section 29 S½NE¼, SE¼NW¼, N½SW¼
Section 30 E½SE¼
Section 31 NE¼NE¼

Unnamed Road 1

Township 6 North, Range 12 West
Section 4 S½SW¼
Section 5 S½SE¼, S½SW¼
Section 6 SE¼SE¼

Section 7 NE¼NE¼
Section 8 N½NW¼, N½NE¼
Section 9 N½NW¼

Unnamed Road 2

Township 6 North, Range 12 West
Section 7 SE¼SE¼
Section 18 NE¼NE¼

Access Road

Township 6 North, Range 12 West
Section 15 W½SW¼
Section 16 E½SE¼, S½SE¼, S½SW¼
Section 17 S½SW¼, S½SE¼
Section 18 SE¼SE¼
Section 19 NE¼NE¼
Section 20 N½NW¼, N½NE¼
Section 21 N½NW¼, N½NE¼

2.2 Project Components

EAGL, LLC proposes to construct, operate, maintain, and decommission or renew the following Project:

- Up to a 6-mile-long, single-circuit 230-kV gen-tie line between a newly constructed substation on private land and the existing Harcuvar Substation on BLM-administered land.
- Up to a 6-mile-long, two-track gen-tie structure access road.
- Up to six individual 2-acre-sized pull pockets and four individual 3-acre-sized staging areas along the gen-tie line for short-term use during construction.
- Upgrades to the existing WAPA substations: Harcuvar, Parker, and Davis. Harcuvar Substation is the only substation that will require a footprint expansion of up to 2 acres.
- Up to 7.5 miles (39,409 linear feet) of road improvements to five existing access routes: Unnamed Road 1, Low Mountain Road, 77th Street, Unnamed Road 2, and Access Road.

Acreage disturbances associated with the Project are presented in Table 2 (the acreages in Table 2 are not additive) and the Application Area with Project features in Figure 2.

Table 2. Approximate Disturbance of the Project on Bureau of Land Management Lands

Project Component	Application Area (acres)	150-foot ROW (acres)	Long-Term Disturbance (acres)	Short-Term Workspace (acres)	Proposed Total Disturbance[1] (acres)
Up to a 6-mile-long gen-tie line within a 150-foot-wide long-term ROW[2]	740	109	0.2	24	24.2
25-foot-wide gen-tie access road within ROW	-	18	18	-	18
Project access roads[3]	-	-	16.1	13.6	16.1
Turnouts at Project access roads	-	-	2.5	-	2.5
Harcuvar 230-kV Substation	-	2	2[4]	-	2
Parker 230-kV Substation	-	-	-	-	-
Davis 230-kV Substation	-	-	-	-	-
Staging Areas (4, 3-acre areas)	10.5	1.5	-	12	12
Pull pockets (6, 2-acre areas)	3	3	-	6	6
Subtotal:					
Total Long-Term Disturbance (acres)					**38.8**
Total Short-Term Disturbance (acres)					**55.6**
Total Proposed Disturbance (acres)					**80.8**

[1] Acreages are not additive.
[2] Disturbance is calculated assuming the entire gen-tie line will use monopole or H-frame structures (8 structures × 6 miles = 48 structures), yielding a worst-case disturbance estimate for impact analysis.
[3] Short-term workspace (15-feet) for access roads will overlap the final proposed road widths.
[4] Substation expansion will overlap the 150-foot ROW and Application Area.

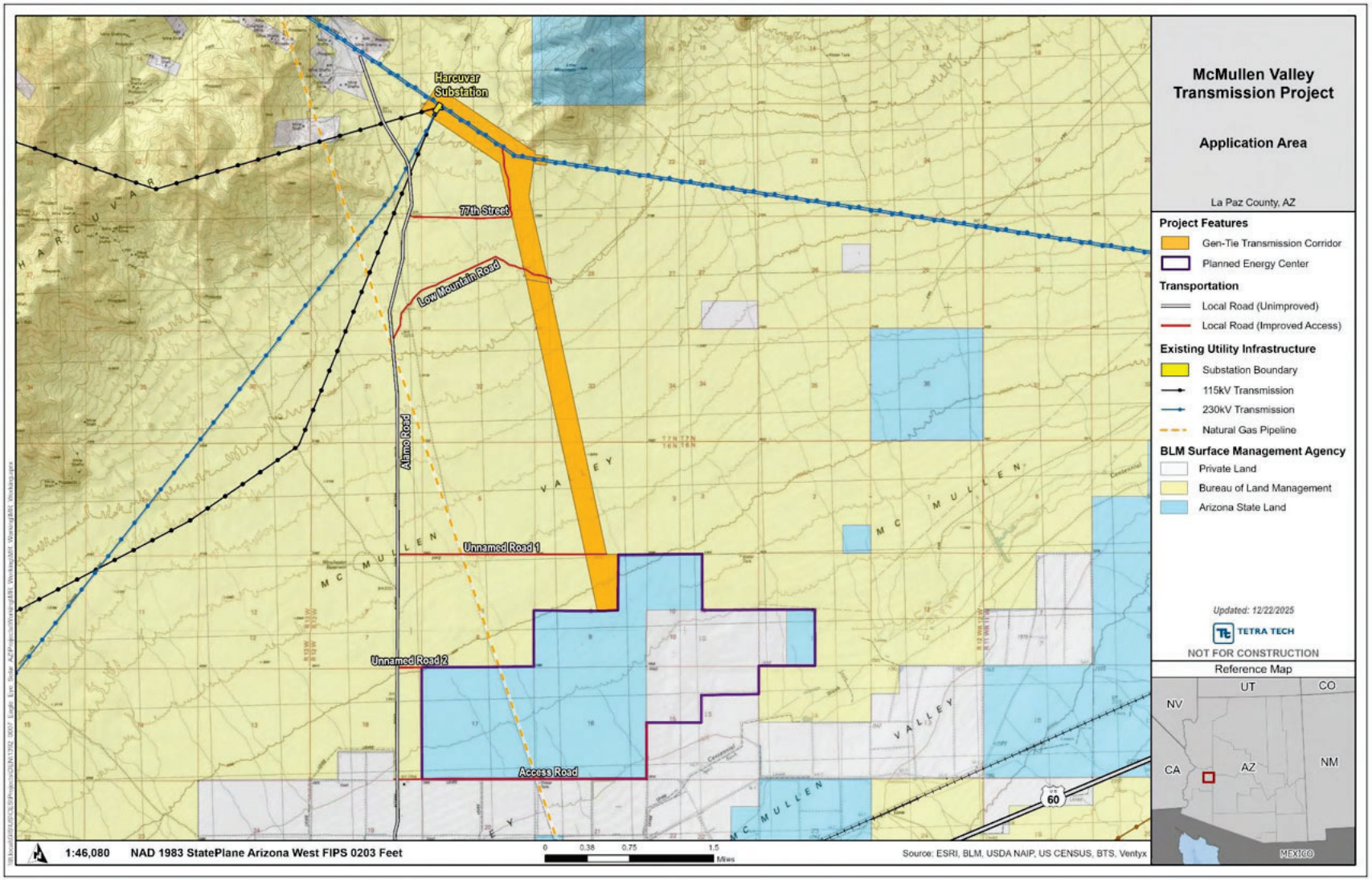

Figure 2. Application Area

2.2.1 Generation Tie-In Line Right-of-Way

The 230-kV overhead gen-tie line would require a long-term 150-foot-wide ROW, except in select areas where sensitive resources are actively being avoided through narrowing the ROW, or in select locations where the height of structures is taller to span avoidance areas, requiring a wider ROW between structures. The overhead gen-tie line would be supported by weathering steel single-circuit monopole or monopole H-frame structures (Figure 3) and follow Avian Power Line Interaction Committee requirements (APLIC 2006, 2012). All transmission structures would include optical ground wire for communication purposes.

Figure 3. Typical 230-kilovolt Single-Circuit Monopole and Monopole H-Frame Designs

The average height of structures will vary based on clearance requirements, topography, and line design specifications (see Table 2.2). Typical structure heights are expected to range between 90 and 100 feet. Spans between structures will generally measure from 700 to 1,200 feet, equating to approximately 5 to 8 structures per mile. In certain cases, longer spans may be required, which can reduce ground clearances and necessitate additional vegetation clearing to maintain proper electrical clearances. Under these conditions, taller structures and a wider ROW may be needed to ensure clearance during “blowout” scenarios. During final engineering, conductor clearances might be increased at specific locations to accommodate site-specific factors and ensure safe operation. Long-term disturbance associated with the structures varies depending on whether they are directly

embedded into the ground or supported by drilled pier foundations. Short-term disturbance for each structure would measure 150 feet × 150 feet and would extend beyond the ROW into the Application Area.

Applicant-committed environmental protection measures include:

- Federally listed or BLM sensitive plant species will be avoided.
- Avoid plants protected by the Arizona Native Plant Law wherever practicable.
- Salvage small saguaros under 1 foot tall that cannot be avoided. Salvaged plants would be made available in accordance with the Arizona Department of Agriculture, as applicable, if they cannot be avoided during construction.
- Avoidance of Sonoran Desert tortoise burrows and implementation of the Sonoran Desert tortoise measures adapted from the Arizona Interagency Desert Tortoise Team's Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat (AIDTT 2008) would apply.

Table 3. Summary of Major Features for the 230-kilovolt Overhead Gen-tie line

Feature	Description
230-kV line length	Up to 6 miles
Types of structures	Monopole or H-Frame steel structures (Figure 3)
Typical structure height	90 to 100 feet
Structure work area	150 × 150 feet or 0.5 acre
Structure foundation area	79 square feet (10-foot-diameter drilled pier foundations)
Span length	Typically, 700 to 1,200 feet
Structures per mile	5 to 8
ROW width	150 feet

2.2.2 Additional Short-Term Workspace

Short-term work areas, including pull pockets and staging areas, would be required to construct the Project. The pull pockets would extend outside the permanent 150-foot ROW to ensure safe construction of structures for pulling and tensioning sites at angled structure locations. Each pull pocket would be approximately 600 × 150 feet, extending outward from the centerline in both directions at angles greater than 20 degrees. Details on pull pockets are provided in Table 4.

Table 4. Pull Pocket Details

Number North to South	Land Status	Acres
1	BLM	2
2	BLM	2
3	BLM	2
4	BLM	2
5	BLM	2
6	BLM	2
Total		12

Up to four short-term staging areas are proposed for the storage of materials and equipment and for the assembly of structures. The staging areas would require a total of approximately 12 acres and would be located close to the ROW and Harcuvar Substation to support its expansion for interconnection. The staging areas would also be used to park vehicles, assemble crews, and collect trash for off-site disposal, etc. The staging areas may also contain a temporary portable construction office trailer, bathroom, and electric power. For this Project, electric service at the staging areas may be provided by attaining new electrical service use of diesel-operated generators. Table 5 lists the staging areas needed to construct the proposed Project, as needed.

Table 5. Staging Area Details

Number North to South	Land Status	Acres
1	BLM	3
2	BLM	3
3	BLM	3
4	BLM	3
Total		12

2.2.3 Generation Tie-In Access Roads

Access roads would be needed to facilitate the gen-tie line construction and long-term regular inspection and maintenance activities, as well as decommissioning activities. Existing roads would be used to access the ROW and individual structures to the maximum extent possible within the northern portion of the ROW. But in some cases, new roads would need to be developed or existing roads would need to be improved to accommodate construction vehicles. In some cases, the ROW or individual structures may be accessed by constructing short spur roads from existing roads. However, a new two-track access road would need to be constructed to access the rest of the ROW. The access, within the ROW, would be constructed up to 25 feet wide during construction and reduced through reclamation to resemble a two-track road for long-term operation and maintenance. Improvements may be required at the time of decommissioning and would likely resemble improvements completed during construction activities.

Applicant-committed environmental protection measures include:

- Federally listed or BLM sensitive plant species will be avoided.
- Avoid plants protected by the Arizona Native Plant Law wherever practicable.
- Salvage small saguaros under 1 foot tall that cannot be avoided. Salvaged plants would be made available in accordance with the Arizona Department of Agriculture, as applicable, if they cannot be avoided during construction.
- Avoidance of Sonoran Desert tortoise burrows and implementation of the Sonoran Desert tortoise measures adapted from the Arizona Interagency Desert Tortoise Team's *Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat* (AIDTT 2008) would apply.

2.2.4 Substation Upgrades

As previously discussed, WAPA has identified the need for upgrades to existing substations to support interconnection at the Harcuvar Substation. These upgrades include expanding the Harcuvar Substation by an additional 2 acres and converting its configuration from a tap to a possible breaker-and-a-half configuration. Following construction and with BLM approval, the Applicant will transfer the additional acreage to WAPA. Additionally, the Parker 230-kV substation requires upgrades to its metering Current Transformer and jumpers, with similar enhancements needed at the Davis 230-kV substation, including the implementation of protection system redundancy. Upgrades will be within the existing footprints and will not result in short or long-term disturbance.

The proposed substation to be constructed on private land is not considered a Federal action (Department of the Interior 2025); therefore, it is not discussed further.

2.2.5 Project Access

Three existing, unpaved roads are proposed for improvement to access the Project and would be used as primary access for construction-related traffic, maintenance activities, and eventual decommissioning activities (Unnamed Road 1, Low Mountain Road, and 77th Street). Unnamed Road 1 is a two-track road from Alamo Road, approximately 4 miles north of the Alamo Road/2nd Street intersection; it turns east and would be improved by approximately 1.6 miles to the ROW. Low Mountain Road, a graded, dirt road from Alamo Road, is approximately 5.8 miles north of the Alamo Road/2nd Street intersection; it turns northeast and would be improved for approximately 1.9 miles to the ROW. 77th Street, a graded, dirt road from Alamo Road is approximately 7 miles north of the Alamo Road/2nd Street intersection; turns east and would be improved for approximately 1.0 mile to the ROW. Two additional existing roads are proposed for improvement to access the future energy center (Unnamed Road 2 and Access Road). Unnamed Road 2 is an existing paved road from Alamo Road approximately 4.5 miles north of the Alamo Road/2nd Street intersection; it turns east and would be improved by approximately 0.2 miles to the future energy center. Access Road is another existing graveled road from Alamo Road approximately 2.4 miles north of the Alamo Road/2nd Street intersection; it turns east and would be improved by approximately 2.7 miles to the future energy center. Additional improvements proposed include the addition of up to ten (10) turnouts, 0.25-acre each, totaling 2.5 acres. Table 6 lists the proposed access roads, dimensions of proposed improvements, and type(s) of improvements proposed. Short-and long-term disturbances associated with the proposed improvements are listed in Table 2.1.

Table 6. Proposed Access Roads and Improvements

Proposed Access	Improvement Type	Proposed Road Dimensions
Unnamed Road 1	All-weather, gravel, and two turnouts (0.25 acre each)	8,495 linear feet (1.6 miles) and 25 feet wide
Low Mountain Road	All-weather, gravel, and two turnouts (0.25 acre each)	9,876 linear feet (1.9 miles) and 40 feet wide
77th Street	All-weather, gravel, and two turnouts (0.25 acre each)	4,846 linear feet (0.9 mile) and 25 feet wide
Access Road	All-weather, gravel, and one turnout (0.25 acre)	14,464 linear feet (2.7 miles) and 40 feet wide
Unnamed Road 2	All-weather, gravel, and one turnout (0.25 acre)	1,088 linear feet (0.2 mile) and 40 feet wide

Project road design and construction would be completed per requirements detailed in the BLM Road Design Handbook (9113-1) (BLM 2011), the BLM Roads Manual (9113;) (BLM 2015), and applicable Department of Transportation standards and specifications. New access roads would be designed to follow natural contours, minimize hill cuts, and avoid ephemeral drainages, as feasible. Improvements to Unnamed Road 1, Low Mountain Road, 77th Street, Unnamed Road 2 and Access Road would also conform to the International Fire Code 2024 road design standards.

2.2.6 Induced Currents

Alternating current transmission lines can potentially induce currents on nearby metallic structures such as pipelines, fences, or similar facilities. Standard design and construction practices would be used to minimize this effect. This condition can occur during regular operations, but more often happens when faults (abnormal electrical currents, such as a “short-circuit”) occur, which sometimes results in electrical current flowing from the structure and into the ground. Several factors contribute to the severity of the effects, including the proximity, alignment, and composition of adjacent facilities as well as the amount of current being conducted and the ground’s inherent resistivity. Grounding of existing metallic facilities outside the ROW may be necessary, contingent upon agreement with the appropriate responsible party.

The Applicant seeks to minimize the potential for induced currents by providing a minimum offset from existing transmission lines that parallel the proposed route. In these cases, a minimum offset of 100 feet from the outside edge of the proposed structures to the outside edge of the existing structures of the WAPA gen-tie line would occur. A larger offset may be required in some circumstances; this would be evaluated on a case-by-case basis once adequate information is collected and can be assessed. Design of the Project’s characteristics would progress as more information is gathered through agency coordination and field reviews.

3.0 PROJECT CONSTRUCTION, OPERATION, MAINTENANCE, AND DECOMMISSIONING OR RENEWAL

The following section describes the activities that are anticipated to occur before and during Project construction, throughout operation and maintenance, and decommissioning or renewal of the Project.

3.1 Preconstruction Activities

Preconstruction activities at the Project will be undertaken and others are planned to minimize and avoid sensitive resources and to prepare both the site and crews for construction.

3.1.1 Worker Awareness Training

Prior to commencing work on the Project, all construction personnel will undergo environmental training to ensure compliance with all applicable environmental regulations, including the requirements outlined in the ROW grant and POD. This training will cover Project-specific mandates and address any local environmental concerns as needed. Key topics will include the conditions of the BLM ROW grant, defined roles and responsibilities, communication protocols, proper use of flagging and signage, disturbance boundaries, access and travel restrictions, and relevant resource mitigation plans. Training may take place either at the contractor's offices or on-site to address any immediate issues encountered during construction. Individuals or crews found not complying with environmental protocols will be given additional remedial training. The contractor will keep a comprehensive record of all personnel who have completed the training and will share this record with the BLM and/or the Applicant upon request.

3.1.2 Geotechnical Investigation and Field Surveys

EAGL, LLC will perform geotechnical investigations for the Project to gather the subsurface data needed to finalize the foundation designs for the gen-tie line structures. This information will help accurately locate each structure and confirm its final placement, as well as provide the necessary subsurface details for preparing commercial requests for proposal packages.

Field surveys will be carried out to precisely determine the centerline of the authorized ROW. Prior to starting any construction surveying, the necessary permits will be acquired. Boundaries for ground disturbance, structure placements, and short-term staging areas will be marked with stakes and flags, with the proposed centerline also flagged and staked as needed.

3.1.3 Pre-construction Resource Studies

The following resource surveys have been performed for the Eagle Eye 2 Project. The Eagle Eye 2 Project footprint area encompasses the footprint of the proposed McMullen Valley Project. Study findings are detailed in section 7.0.

- Air Quality and Climate Change Technical Report (Tetra Tech 2025a)
- Aquatic Resources Delineation Report (Tetra Tech 2024a)
- Biological Reconnaissance Assessment Report (Tetra Tech 2023a)

- Botanical Survey Report (along portions of the proposed gen-tie; Tetra Tech 2023b)
- Cultural Resources Class I Inventory Report (Tetra Tech 2024b)
- Cultural Resources Survey Report Summary Form (Tetra Tech 2024c)
- Cultural Resources Class III Inventory Report (Tetra Tech 2025b)
- Critical Issues Analysis (Tetra Tech 2023c)
- Preliminary Hydrologic Study (Kimley-Horn 2023)
- Drainage Report (Kimley-Horn 2025)
- Groundwater Basin Analysis and Modeling Report (Clear Creek Associates 2025)
- Sonoran Desert Tortoise Survey Report (Tetra Tech 2024d)
- Revised Gen-tie Corridor Sonoran Desert Tortoise Survey Report (Tetra Tech 2025c)
- Thrasher Protocol Survey (Hunt and Pavlick 2023)
- Unexploded Ordnance Site Inspection (Tetra Tech 2023d)
- Visual Resource Assessment (Tetra Tech 2024e)
- Glint and Glare Analysis (Tetra Tech 2025d)
- Traffic Impact Analysis (Tetra Tech 2024f)
- Paleontological Resources Report (Chronical Heritage 2025)

3.2 Construction Activities

Following the pre-construction phase, the construction process will involve a workflow managed by a crew of approximately 30 individuals. Activities will include site access and preparation, excavation and foundation work, structure assembly and erection, conductor and shield wire stringing, testing and commissioning, and site restoration and reclamation. Table 7 lists typical vehicle specifications expected to participate, though actual equipment use will be influenced by conditions encountered during construction.

Table 7. Anticipated Construction Vehicle/Equipment Roster

Construction Activity	Vehicle/ Equipment Type	Quantity Anticipated (peak concurrent)	Estimated Activity Schedule (days within 360-day window)	Estimated Usage Time (hours/day)
Site access/ prep/land clearing	Brush hog	4	60	8
	Bulldozer	6	90	8
	Pickup truck	20	120	10
	Hydro-axe	3	45	8
Construction of gen-tie line	Pickup truck	8	90	10
	Water truck	2	90	8
	Boom truck	3	90	8
	Tractor trailer	6	60	8
	Tracked vehicle	4	90	8
	Crane	2	60	8
	Material truck	6	90	8

Construction Activity	Vehicle/ Equipment Type	Quantity Anticipated (peak concurrent)	Estimated Activity Schedule (days within 360-day window)	Estimated Usage Time (hours/day)
	Concrete truck	3	30	6
	Helicopter	1	15	4
Operation and maintenance	Helicopter	1	30	3-4
	Pickup truck	6	360	4-8
Termination/ rehabilitation	Tracked vehicle	3	45	8
	Crane	2	30	6
	Pickup truck	6	60	8
	Tractor trailer	4	45	8
	Dump truck	6	45	8
	Boom truck	2	30	8

N/A = not applicable

3.2.1 Site Access and Preparation

Vegetation would not be removed from the Project unless it is located along planned access or spur roads to structures, individual structure locations, or short-term staging areas.

Short-term staging areas would be cleared using the appropriate equipment, which could range from a brush hog flail-type mower to a bulldozer to blade the area required to provide a safe storage location for placing equipment, vehicles, and materials. Individual structure sites would be cleared next using the same equipment. The structure work area would be cleared of vegetation only to the extent necessary. Any chemical treatments of the ROW would comply with BLM regulations and procedures. Within the work areas, the long-term disturbance associated with the structures would be approximately 4.91 square feet for directly embedded structures and approximately 38.48 square feet for structures with drilled pier foundations.

The “overland drive-and-crush” method will primarily be employed to prepare work areas in relatively level areas with low-growing grasses and shrubs. This technique involves crushing vegetation without cropping it. In similar level areas with dense vegetation, aboveground cutting methods will be used, aiming to leave the root crowns intact. Soil compaction will occur, with excavation limited to foundation holes. Excess soil from excavations will be placed around the base of each structure to ensure positive drainage away from the structure. Large spoil materials (exceeding 3 cubic yards) will be removed and disposed of at an appropriate off-site location. When grading is required to create a safe, level workspace for structure installation, topsoil will be segregated and later replaced to provide a suitable seedbed for reclamation, and excess fill may be used to level other areas as needed. Upon completion of the gen-tie line, all short-term disturbance areas will be reclaimed in accordance with BLM requirements.

Federally listed and BLM sensitive plant species will be avoided, and plants protected by the Arizona Native Plant Law wherever practicable. If required, protected plants would be salvaged, including small saguaros under 1 foot tall. Salvaged plants would be made available in accordance with the Arizona Department of Agriculture, as applicable. Furthermore, Sonoran Desert tortoise burrows will be avoided, and the Applicant will implement the Sonoran Desert tortoise measures adapted from the

Arizona Interagency Desert Tortoise Team's *Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat* (AIDTT 2008).

3.2.2 Foundation Installation

Access to the foundation installation site will be facilitated by existing roads to accommodate equipment such as power augers or drills, cranes, material delivery trucks, and concrete mixers. Foundation holes will generally be excavated using a power auger mounted on heavy machinery; however, in some locations, a drilling rig may be required. In areas where the ground is rocky and unsuitable for augering or drilling, blasting may be necessary to fracture the rock before excavation can proceed. Suitable excavated material may be reused as backfill or for other fill purposes.

Once excavation is complete, foundation holes will be prepared for cast-in-place concrete footings, except for structures that are directly embedded into the ground. Reinforcing steel and anchor bolts will be positioned within the holes before being encased in concrete. Any excess concrete or washout material will be removed from the site or temporarily stored on spoil piles. To ensure safety, open or unguarded foundation holes will be covered, and temporary safety fencing may be installed when feasible to protect the public and wildlife.

The design and installation of each foundation will be tailored based on geotechnical investigations and the specific design requirements of each structure location.

3.2.3 Structure Assembly and Erection

Structure components will be grouped according to each individual structure's requirements and transported by truck to the respective sites. At each location, the structures will be assembled on the ground and then lifted into position using a crane. Typically, full assembly of the structures will occur within the ROW. Temporary guard structures, designed as H-frames and directly embedded into the ground, will be installed over highways, power lines, and similar features. These guard structures are expected to be situated within the ROW.

3.2.4 Grounding

Copper ground rods will be installed near the base of each structure foundation and connected to the structure using copper cables. Additionally, if ground resistance requires, a counterpoise—a bare copper-clad or galvanized steel cable—will be buried at least one foot deep, extending outward from the structure within the ROW.

3.2.5 Conductor Stringing

Reels of conductor and shield wire will be delivered to the ROW and loaded onto vehicle-mounted pulling machines. Heavy-duty vehicles equipped with powered pulling equipment at one end and powered braking or tensioning equipment at the other will be used to pull the shield wire and conductor bundles into position. A pilot wire will be threaded through pulleys suspended from the structure insulators and then connected to a stronger pulling wire, which will guide the shield wire and conductor bundles into place without touching the ground. After the wires are strung through the pulleys, adjustments will be made to achieve the proper sag between structures. Once the correct sag is established, the pulleys will be removed, and the conductors will be secured to the insulators with

clamps. At dead-end structures, conductors will be fastened to insulators using compression fittings to ensure a secure connection.

Conductor stringing on straight line sections will remain within the ROW; however, at turning points with angles exceeding 20 degrees, additional short-term workspace outside the ROW will be needed to accommodate pull pockets.

3.2.6 Cleanup

During the construction of the transmission line, all workspaces, staging areas, and access roads will be kept clean and well-organized. Waste and debris (scrap wood, steel, plastic, paper, waste oil filters, oily rags, and oil sorbent) will be regularly collected and disposed of in accordance with proper procedures. Recyclable materials would be separated from non-recyclable items and transported to a designated recycling facility. Recycling would be done in accordance with applicable federal and state requirements. Wooden construction waste, such as wood from wood pallets, would be sold, recycled, or delivered to a waste facility as compostable materials. Other compostable materials, such as vegetation, may also be delivered for compost. Non-hazardous construction waste that cannot be reused or recycled would be disposed of at municipal landfills. Contractors and workers would be educated about waste sorting, appropriate recycling storage areas, and how to reduce landfill waste. Spill prevention measures and secondary containment would be implemented where appropriate. Open burning will be strictly prohibited on BLM-administered lands.

The Applicant would implement the following good housekeeping measures during construction (and decommissioning activities):

- Proper maintenance of vehicles and heavy equipment, inspect frequently for leaks, and conduct necessary repairs promptly.
- Perform major equipment repairs off-site.
- Store materials at designated staging areas in a neat, orderly manner and in accordance with applicable plans.
- Prevent runoff at the source and, where feasible, cover exposed piles of soil or construction materials.
- Trash cans and recycling receptacles would be placed to minimize litter.
- Portable toilets would be maintained in good working order by the leasing company, and waste would be disposed of properly.
- Inspect daily to ensure proper use and disposal of materials onsite (by the site superintendent).

3.2.7 Noxious Weed Control

Noxious weeds and non-native invasive plant species would be controlled or eradicated in a manner consistent with the *2016 Vegetation Treatments Using Aminopyralid Fluroxypyr and Rimsulfuron on BLM Lands in 17 Western States Programmatic Environmental Impact Statement* (BLM 2016). This includes established noxious weeds and non-native invasive plant species that would be controlled to a level equal to or below the level of pre-project development or adjacent lands. Herbicide use for noxious

weeds and non-native invasive plant species would be in accordance with a BLM-approved Pesticide Use Proposal.

3.2.8 Reclamation

Following construction, disturbed areas would be restored using BLM-approved seed mixes and in compliance with BLM standards. Vegetation, soil, and rocks displaced during construction will be scattered randomly across the Project site, avoiding the creation of rows, piles, or berms unless otherwise directed by the BLM. In locations requiring erosion control, appropriate structures will be installed based on site-specific soil conditions, following industry best management practices (BMPs). Reclamation activities will commence as soon as practicable after final construction is finished.

3.2.9 Dust Control

Project construction is likely to cause temporary fugitive dust related to grading, vehicle traffic, drilling, and other construction activities. Dust control measures are outlined in the Dust Abatement Plan and follow Arizona Department of Environmental Quality and Environmental Protection Agency requirements. Binding agents and chemicals may be used on access roads with BLM approval. Some of the BMPs that would be incorporated include:

- Minimize grading and vegetation removal to the extent feasible.
- Where vegetation removal and/or grading is necessary, minimize the time between vegetation removal and/or grading and module installation to the extent feasible.
- Limit vehicle speeds to 15 miles per hour.
- Apply water/dust palliative to disturbed soil areas and maintain proper moisture levels for soil compaction. Minimize over application of water to prevent runoff and ponding.
- Suspend excavation and grading during periods of high wind.
- Cover trucks hauling soil or other loose material.
- Gravel or aggregate would be used where unimproved roads meet paved roads to limit off-site disturbance and prevent mud and dirt track-out.

3.2.10 Project Safety

A BLM-approved Health and Safety Plan would be implemented during construction and would include written safety programs and procedures, a hearing conservation program, a respiratory protection program, fall protection procedures, hot work procedures, electrical safety, heavy equipment procedures including crane and hoist safety procedures, personal protective equipment requirements, lockout/tagout procedures, competent person designation, and cold and heat illness prevention procedures. An Emergency Action Plan would designate responsibilities and actions to be taken in the event of an emergency.

Fire protection would be provided to limit the risk of workers' injury, property loss, and possible disruption of the electricity generated by the Project. Fire protection would include worker training and on-site firefighting equipment (i.e., portable fire extinguishers). Locations of portable fire extinguishers would include, but would not be limited to, temporary construction office spaces, work areas, storage areas, work trucks, and other vehicles. Firefighting equipment would be marked

conspicuously, readily accessible, routinely inspected, and replaced/serviced immediately if defective or needing a charge.

A Fire Management and Protection Plan would be prepared if required for Project construction, O&M, and decommissioning. The plan would be submitted for review to the BLM, state, and local fire departments. The plan would include measures to safeguard human life, prevent worker injury, preserve property, and minimize equipment outages caused by fire. The plan would specifically address protocols for fire-safe construction, reduction of ignition sources and fuel sources, water availability, and emergency firefighting equipment maintenance (e.g., fire extinguishers and shovels). Firefighting equipment would be maintained in accordance with local and federal Occupational Safety and Health Administration requirements.

4.0 OPERATIONS AND MAINTENANCE

Routine equipment maintenance and inspections would be completed in accordance with the manufacturer's requirements (Table 8).

Table 8. Routine Maintenance Protocol

Project Component	Frequency	Task
Overhead gen-tie line	Annually	Review open and close operations
	Annually (and following heavy rains)	Inspect guy wires and tower angle
		Inspect supports and insulators
		Check for discoloration at terminations
Access Roads	Annually (and following heavy rains)	Inspect for erosion
Vegetation	Annually	Inspect for localized vegetation management
		Weed abatement via manual and mechanical means
	Every 3 years or as needed	Mow as required to reduce vegetation height to 12 inches

4.1 Inspections

Routine inspections of transmission lines, vegetation, roads, and support systems are essential for the safe, efficient, and cost-effective operation of the Project. Properly conducted maintenance activities are expected to have minimal impact and are typically authorized under the BLM ROW grant.

Annual aerial or ground inspections will be performed to identify any conditions posing immediate hazards to the public or employees, or risks of supply interruption or damage to the electrical system. Identified issues will be addressed before peak demand periods in summer and winter.

Ground inspections will be conducted along approved access roads, including the gen-tie road, or directly within the ROW to each structure as needed. Inspectors will examine all equipment and components requiring potential repairs, using four-wheel-drive trucks, all-terrain vehicles, or on foot. The timing of ground inspections will be based on weather, aerial inspection findings, and other variable conditions on an annual basis. Minor repairs, such as replacing identification numbers or repairing ground wires, may be performed during these inspections without the need for specialized equipment or large crews. Aerial inspections may occur annually, while ground patrols will be conducted at least twice per year.

4.2 Line Maintenance

Routine maintenance activities encompass standard tasks that have historically been performed on a regular basis. These include the replacement or repair of individual structures, components, cables, lines, insulators, and other facilities that have become obsolete, worn, or aged. Such replacements are expected to occur infrequently, typically every 5 to 10 years, or as determined through inspections. These maintenance tasks generally involve small crews working with a limited amount of equipment over a timeframe ranging from a few hours to several days. The equipment used varies depending on the scope of the work but commonly includes four-wheel-drive pickup trucks, man-haul

vehicles, material flatbeds, line trucks, cranes, tractor-trailers, and high-reach bulldozers or caterpillars.

Maintenance vehicles and equipment will generally access the ROW and individual structures via the gen-tie road, operating within the existing level work area surrounding each structure without causing additional ground disturbance. Should maintenance activities or equipment need to extend beyond the ROW, crews will coordinate with the BLM Authorized Officer(s) to secure any necessary temporary use permits. These activities will be confined to areas previously disturbed during Project construction.

Major maintenance activities, which occur infrequently, require advanced planning, budgeting, and coordination with relevant agencies. These tasks typically involve larger crews and a range of equipment, including heavy machinery, and often span several days or more. Prior to commencing any major maintenance work, the Applicant/WAPA will notify the BLM to determine if special notifications or additional approvals are necessary. All major maintenance efforts will comply fully with the standards and guidelines outlined in this POD, as well as the terms and conditions of the ROW grant.

In the event of an emergency, the Applicant/WAPA will prioritize a rapid response to restore power. Upon detection of an incident, control room dispatchers immediately alert the appropriate operations personnel in the affected area, and crews and equipment are quickly mobilized to address the situation. The Applicant/WAPA will promptly deploy the necessary teams to restore service and notify the relevant land management agency based on the incident's location. Emergency maintenance may include repairs following transmission structure or conductor failures caused by natural hazards, fires, or human-related damage. These urgent repairs are essential to eliminate safety risks, prevent further damage to the power line, or restore power outages. Typically, the equipment used for emergency repairs resembles that used in routine maintenance; however, additional resources such as helicopters may be required. Whenever feasible, the Applicant/WAPA will follow the same environmental and operational constraints applied to routine and major maintenance activities to minimize resource impacts.

4.2.1 Vegetation Management

The Applicant/WAPA is responsible for managing vegetation to maintain proper conductor clearances at points of maximum sag and sway, reduce potential fire hazards, and ensure access within the ROW. Mature vegetation located under or near conductors within or adjacent to the ROW will be removed as needed to meet electrical clearance standards established by NERC. Typically, woody vegetation will be cleared and treated with herbicides, while slash will either be left in place or disposed of according to land management agency guidelines. Additionally, shrubs and other obstructions within the ROW will be regularly cleared to maintain safe and reliable operation.

Vegetation control treatments to manage the growth of woody species along the ROW will be conducted. These treatments primarily involve the application of herbicides to target species such as creosote and mesquite, preventing encroachment on conductor clearance zones, facilities, and gen-tie access roads, as well as controlling vegetation that could hinder future operation and maintenance

activities. All herbicide applications will comply with federal, state, and local regulations, as well as BLM requirements.

In addition to herbicide use, vegetation may be removed mechanically using tools such as chainsaws, weed trimmers, rakes, shovels, brush hooks, and mowers. In areas of dense growth, heavier equipment like masticators or mounted brush mowers may be employed. The scope and duration of these clearing activities, along with crew size and equipment needs, will depend on the extent and density of vegetation being managed.

Herbicides will also be applied to control noxious weeds and incompatible tree and brush species, such as mesquite and creosote bush, which can regenerate from root systems after removal. These vegetation management efforts will be coordinated closely with the BLM.

4.3 Access Road Maintenance

Repairs to the ROW or access roads will be conducted either as part of scheduled line inspections or in response to significant degradation or emergencies. The Applicant/WAPA is responsible for maintaining approved access roads in a safe and usable condition to support maintenance activities on the transmission line. Road repairs may involve grading, fixing erosion-prone areas, addressing side slope slumping, improving drainage, and repairing damage from flooding or scouring. In some instances, cut-and-fill operations using foreign material may be necessary to restore roads to a condition suitable for safe passage of maintenance vehicles, including high-reach boom trucks.

When improvements to an approved access road are required, the Applicant/WAPA will notify the BLM Authorized Officer prior to using heavy equipment appropriate for the task, which may include graders, backhoes, four-wheel-drive pickup trucks, and steel-tracked front-loaders or bulldozers. Following maintenance activities, all ROW and access routes used will be stabilized and rehabilitated according to the procedures outlined in this POD.

5.0 RIGHT-OF-WAY RENEWAL OR DECOMMISSIONING

5.1 Right-of-Way Renewal

The proposed Project is expected to operate for a minimum of 30 years or more. To support the operation, maintenance, and eventual decommissioning of the gen-tie line facilities on BLM-administered lands, a ROW grant with a 30-year term and the option for renewal will be required. Upon expiration of the initial 30-year term, the Applicant/WAPA may choose to renew the ROW grant to continue operating the transmission line. The terms and conditions of the original ROW grant may be revised during the renewal process.

5.2 Project Decommissioning

At the conclusion of the gen-tie line's expected 30-year service life, the Applicant/WAPA will obtain the necessary approvals from the BLM Authorized Officer to proceed with decommissioning. This process will involve the removal of conductors and structures, with all materials cleared from the ROW within 180 days. Equipment remaining at substations and any unsalvageable materials will be disposed of at authorized facilities. Disturbed areas will be regraded and revegetated in accordance with BLM standards. Once decommissioning is complete, control of the ROW will revert to the BLM.

Decommissioning activities are assumed to require one-third of the workforce, time, and resources as Project construction and are expected to occur over 6 months, with support from up to 35 workers. Decommissioning activities could include the following:

- Deenergize the gen-tie line;
- Dismantling and removal of aboveground structures;
- Excavation and removal of structure foundations, if applicable;
- Restoration of gen-tie road; and
- Scarification of compacted areas.

Equipment such as wire, conductors, and transformers can likely be recycled. Other potentially recyclable materials include concrete.

6.0 ENVIRONMENTAL PROTECTION MEASURES

The following Applicant-committed environmental protection measures have been incorporated into the Project design to lessen or avoid impacts to resources. The design features incorporate applicable BMPs, which are industry- or agency-recommended construction methods that are routinely implemented to minimize impacts on resources.

1. Project substation and interconnection overhead electrical lines will be designed and installed in accordance with the Avian Power Line Interaction Committee's *Suggested Practices for Avian Protection on Power Lines.*

2. Vegetation would be removed only where necessary for access, stability, or safety. Remaining vegetation would be trimmed to 12 inches. Small saguaros (less than 1 ft) would be relocated or salvaged per BLM and Arizona Native Plant Law.

3. Implementation of the following Sonoran Desert tortoise measures adapted from the Arizona Interagency Desert Tortoise Team's *Recommended Standard Mitigation Measures for Projects in Sonoran Desert Tortoise Habitat* (AIDTT 2008):

   An Arizona Game and Fish Department (AZGFD) Protocol Survey shall be completed prior to ground-disturbing activities;

   a. During construction activities, open trenches should have a soil ramp to allow wildlife to escape and should be inspected routinely and prior to backfilling for entrapped desert tortoise (as well as other species);
   b. Construction material staging areas shall be checked for tortoises and other species prior to moving materials (e.g. pole piles, culverts, trailers, etc.);
   c. During construction and maintenance activities, vehicles should not exceed posted speed limits within the Project site. The area near and under vehicles should be inspected for desert tortoise before being moved;
   d. Operators/contractors should receive a copy of the *Guidelines for Handling Sonoran Desert Tortoise Encountered on Roads and Vehicle Ways* (BLM N.D), distribute to workers, and advise on handling procedures;
   e. Care should be taken to not disturb or destroy Sonoran Desert tortoise or their burrows. Pursuing, shooting, hunting, trapping, killing, capturing, snaring, or netting dessert tortoises are prohibited by Arizona State Statute. If a desert tortoise is in danger of being harmed by any activity, that activity should cease until the desert tortoise moves out of harm's way on its own accord or is moved following the *Guidelines for Handling Sonoran Desert Tortoise Encountered on Roads and Vehicle Ways* (BLM N.D). To improve the quality of desert tortoise habitat management, foster public lands stewardship, and incorporate citizen science, the Lake Havasu Field Office wildlife biologists invite you to participate in reporting of Sonoran Desert tortoise or their burrows encountered. This reporting is encouraged, but not required. Report wildlife encounters using a smartphone to photograph the specimen and submit it by email to blm_az_lhfo@blm.gov. Alternatively, the location information (latitude and longitude or Universal Transverse Mercator), time, date, and suspected species common name can be submitted by email to blm_az_lhfo@blm.gov.

7.0 RESOURCE VALUES AND ENVIRONMENTAL CONSIDERATIONS

The proposed Project is in a rural area of unincorporated La Paz County, Arizona. Adverse effects to land use, recreation, visual resources, water resources, noise, or historic/archaeological resources/ properties are not anticipated. There may be minor adverse effects on air quality, soil, vegetation, and wildlife species. The POD would be updated with additional environmental resource information in subsequent revisions, as needed. In addition, the Applicant has conducted studies and analyses related to the National Environmental Policy Act (NEPA) environmental review process. Resource studies completed by the Applicant to date for the proposed Project are listed in Section 3.1.3 Pre-Construction Resource Studies.

In August 2022, the Applicant reviewed the project area. The objective of the siting review was to identify potentially regulated resources and other development constraints in and near the site and inform decisions for selecting the least conflicted and most suitable area for development. Based on the review, the proposed Project was chosen for having minimal environmental constraints, being easily accessible across existing roads, and being partially within a Formerly Use Defense Site by the Department of Defense as a bombing and munitions range and maneuver area. BLM favors “remediated and impaired” lands as a priority in processing ROW applications.

7.1 Biological Resources

This section characterizes the Project's environmental setting and evaluates the potential for the occurrence of special status species within the Project based on available habitat and study observations. To assess the potential for occurrences of special status species within the Project, resource-specific studies were completed (Section 3.1.3) and the following publicly available information was reviewed:

- AZGFD Online Environmental Review Tool;
- AZGFD Nongame and Endangered Wildlife Program Species Abstracts;
- Arizona Native Plant Society Arizona Rare Plant Field Guide;
- Google Earth aerial imagery;
- Online species profiles and distribution information;
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online tool; and
- USFWS Critical Habitat Portal.

The USFWS IPaC consultation (USFWS 2025) and AZGFD online environmental review tool (AZGFD 2022) can be found in Appendix C.

7.1.1 Environmental Setting

7.1.1.1 Ecoregion

The Project lies within the Sonoran Basin and Range Level III Ecoregion. This ecoregion contains scattered low mountains and has large tracts of federally owned lands, a large portion of which are used for military training. The Sonoran Basin and Range is slightly hotter than the Mojave and

contains large areas of paloverde-cactus shrub and giant saguaro cactus (*Carnegiea gigantea*), whereas the potential natural vegetation in the Mojave is largely creosote bush (*Larrea tridentata*). Other typical Sonoran plants include white bursage *(Ambrosia dumosa*), ocotillo (*Fouquieria splendens*), brittlebush (*Encelia farinosa*), creosote bush, catclaw acacia (*Senegalia greggii*), cholla (*Cylindropuntia* spp.), desert saltbush (*Atriplex polycarpa*), pricklypear (*Opuntia* spp.), desert ironwood (*Olneya tesota*), and mesquite (*Prosopis* spp.). In the region, winter rainfall decreases from west to east, while summer rainfall decreases from east to west. Aridisols and Entisols are dominant, with hyperthermic soil temperatures and extremely aridic soil moisture regimes (Griffith et al. 2014).

7.1.1.1 Land Cover

According to the National Land Cover Database (USGS 2022a), the Project is composed entirely of scrub/shrub. The National Land Cover Database describes this as areas dominated by shrubs less than 16.5 feet tall with shrub canopy typically greater than 20 percent of total vegetation. This class includes true shrubs, young trees in an early successional stage, or trees stunted by environmental conditions.

7.1.1.2 Management Areas

Federal and state agencies maintain conservation areas for habitats critical to migratory birds and other sensitive species (e.g., National Wildlife Refuges, National Grasslands, state parks, state wildlife areas). There are no federal or state-managed conservation areas within the Project. There is no USFWS-designated critical habitat within the Project (USFWS 2025). The Harcuvar Mountains Wilderness area is approximately 5 miles north of the Project and is managed for wilderness recreation and solitude. The Harquahala Mountains Wilderness Area is approximately 11 miles east of the Project and is managed for exceptional natural diversity defined by the BLM's description of this wilderness area, including a relict "island" of interior chaparral desert grasslands and rare cactus populations. The Harquahala Mountains Wilderness Area also supports habitat for desert bighorn sheep, mountain lions, desert tortoise, and mule deer. The Harquahala Mountains Area of Critical Environmental Concern is located approximately 10 miles east of the Project, surrounding the Harquahala Wilderness Area and is managed for cultural, historic, wildlife, and unique biological resources.

There is an AZGFD-mapped Important Connectivity Zone, approximately 2 miles east of the Project. These "Important Connectivity Zones" were identified by a broad range of stakeholders and organizations to map areas where conservation strategies for game and non-game species are encouraged in making land use decisions. After construction, a majority of the Project will remain in a natural state for use by wildlife.

7.1.2 Federal Listed, BLM Sensitive, and State Species of Greatest Conservation Need

In May 2023, a Biological Resource Assessment was completed with the objectives to 1) describe vegetation communities, 2) evaluate habitat suitability for federally listed, BLM-sensitive, and other special status species, and 3) identify and document special status species and habitat that may be present.

According to the official USFWS IPaC resources list, one federally threatened species, the western yellow-billed cuckoo (*Coccyzus americanus*), one endangered species, the southwestern willow flycatcher (*Empidonax traillii extimus*), and one candidate species, the monarch butterfly (*Danaus plexippus*) have the potential to occur in and near the Project (USFWS 2025). In addition, per conversations with the BLM, though not listed on the IPaC, the federally threatened Yuma Ridgway's rail (*Rallus obsoletus yumanensis*) has the potential to flyover the project area due to the to the Project's location beneath a known migratory pathway. Twenty-two AZGFD Species of Greatest Conservation Need are known to occur within La Paz County. Four have been documented within 5 miles of the Project and ten were observed within the project area, two of which are also BLM-sensitive species (AZGFD 2022). The BLM-sensitive species list includes 63 species for the Colorado River District Office boundaries (BLM 2017). Twelve of these species have the potential to occur within the project area, two of which were observed during surveys in May 2023. The Project is beyond the known geographic or elevational range of the other 51 species, and/or vegetation and landscape features known to support these species are not present. Federally listed species, BLM-sensitive species, and State Species of Greatest Conservation Need with potential to occur in and near the Project are described in the Biological Resources Assessment Report. Given the lack of water in and immediately surrounding the Project and distance to Centennial Wash (greater than 0.75 mile), fish species were excluded from analysis.

In addition, several species of native plants protected under the Arizona Native Plant Law were observed, and the Applicant is coordinating with the BLM and Arizona Department of Agriculture for potential study requirements related to vegetation, special status plants, noxious weeds, and non-native invasive plant species. During surveys, no noxious weeds were observed.

7.1.3 Biological Surveys

In April 2023, a thrasher protocol survey was completed. It followed the Desert Thrasher Working Group (DTWG 2018) and AZGFD guidance. The purpose was to document the presence or absence of Bendire's thrasher (*Toxostoma bendirei*; BETH), LeConte's thrasher (*Toxostoma lecontei*; LCTH), and loggerhead shrike (*Lanius ludovicianus*; LOSH) (Hunt and Pavlick 2023).

Survey results include two BETH, three LCTH, and six LOSH detections on multiple days. Detections included two BETH individuals and three LCTH individuals. Two LOSH pairs, two LOSH individuals, and an active LOSH nest were observed. The LCTH detections were in open habitats compared with those in which BETH were observed. One LCTH sang from trees and shrubs in a small area of a previous detection that suggested territoriality. BETH were found where there was more structural heterogeneity in vegetation, with more abundant trees and dense shrubs. LOSH preferred a more open habitat with scattered trees and snags. Incidental observations of non-target thrashers included curve-billed thrasher (*Toxostoma curvirostre*) and crissal thrasher (*Toxostoma crissale*).

In October 2023 and September 2024, Sonoran Desert tortoise (*Gopherus morafkai*) surveys were conducted following the protocol described in the AZGFD Desert Tortoise Survey Guidelines for Environmental Consultants (Tetra Tech 2024c, 2025c). One live tortoise and Class 1, Class 2, Class 4, and Class 5 burrows were observed. The report concluded that suitable habitat for Sonoran Desert tortoise is present in and near the Project.

During the biological resources assessment surveys and Sonoran Desert tortoise surveys, observations of western burrowing owl (*Athene cunicularia hypugaea*) and suitable habitat were noted and suitable non-breeding habitat for golden eagle (*Aquila chrysaetos*) was observed.

In November 2022, a 100 percent pedestrian plant survey was completed for a portion of the proposed gen-tie corridor (Tetra Tech 2023b). No federally listed or BLM-sensitive plant species were observed and 14 plant species protected by the Arizona Native Plant Law were observed. Approximately 800 individual plants protected by the Arizona Native Plant Law locations were recorded, of which approximately 200 were saguaros. Other Salvage Restricted plants included agave (*Agave deserti*), buckhorn cholla (*Opuntia acanthocarpa*), candy barrel cactus (*Ferocactus wislizeni*), Engelmann's hedgehog cactus (*Echinocereus engelmannii*), Graham's nipple cactus (*Mammillaria grahamii*), prickly pear, ocotillo, teddy-bear cholla (*Opuntia bigelovii*), and Wiggins' cholla (*Cylindropuntia echinocarpa*). Four species on the Salvage Assessed Protect Native Plant list were observed: blue palo verde (*Parkinsonia florida*), desert ironwood, foothills palo verde (*Cercidium microphyllum*), and velvet mesquite (*Prosopis velutina*). Desert ironwood and velvet mesquite are also on the Harvest Restricted Protected Native Plant list.

The Applicant would avoid native plants protected under the Arizona Native Plant Law to the maximum extent possible. If impacts are unavoidable, the Applicant will coordinate with the BLM and the Arizona Department of Agriculture.

7.1.4 Other Biological Considerations

In August 2024, the Applicant submitted a preliminary Bird and Bat Conservation Strategy to the BLM for review. The Applicant revised the report and resubmitted it to the BLM in October 2024. The report is currently still under development as the Applicant coordinates with the BLM. The need for additional resource management plans is also being coordinated with the BLM.

7.2 Babcock Grazing Allotment

The Project would be located within portions of the approximately 37,000-acre Babcock #03006 Grazing Allotment. The allotment was previously authorized for 115 cattle yearlong in an amount of 1,007 animal unit months. There are no active permits/leases issued for this allotment. Fenced areas associated with the expansion of Harcuvar Substation would preclude livestock grazing and a portion of the animal unit months would need to be canceled. Access roads will be constructed, improved, and maintained to minimize impact on grazing operations. Road design would include appropriate fencing, cattle guards, and signs, if necessary. A range improvement inventory was completed for the Project and several pasture fences, corrals, and two water sources (water tanks and troughs) are within the project area (Arid State Land & Ag Associates, LLC 2025).

Depending on the final Project design and configuration, existing range improvements and access may require removal or relocation. Removal of rangeland infrastructure may require compensation and additional coordination with allottees and the BLM. The Applicant met with the interested parties on February 17, May 16, and September 17, 2024, during community events and dinners near the Project. Discussions with the parties and the BLM are ongoing. An evaluation of potential effects on

rangeland resources would be conducted through NEPA and would identify mitigation measures, if necessary.

7.3 Water Resources

In October 2023, the Applicant prepared a preliminary drainage report to review existing surface and groundwater conditions to inform Project design (Kimley-Horn 2023). A comprehensive Drainage Report was completed in June 2025 (Kimley-Horn 2025).

7.3.1 Surface Water

The Project is located at the base of the Harcuvar Mountains, just north of the project area. The project area consists of gentle to moderately sloping (up to 15%) land dissected by ephemeral channels (USDA NRCS 2024). Rainwater from the mountains channelizes before entering the northern portion of the project area and then flows southeast through the project area to Centennial Wash and eventually flows to the Gila River, a perennial river located approximately 59 miles southeast of the project area (Tetra Tech 2024a).

A review of the U.S. Geological Survey National Hydrography Dataset (NHD) identified two ephemeral stream features crossing the gen-tie corridor totaling approximately 0.7 miles (3,646.7 linear feet), and two ephemeral stream features crossing the access roads totaling approximately 2.1 miles (10,987.2 linear feet) (USGS 2022d). The NHD identified ephemeral stream features throughout the project area that are not concentrated around any one source. The majority of these ephemeral stream features originate off-site as surface drainage from the Harcuvar Mountains, and continue to flow through the project area, merging into larger stream channels that flow into Centennial Wash.

The NHD did not show the presence of surface waterbodies, such as ponds or lakes, within the project area. Stream features observed in the data are ephemeral. None are considered jurisdictional under the U.S. Environmental Protection Agency's Revised Definition of Waters of the United States (EPA 2023). The closest jurisdictional waterway is the Gilia River, approximately 59 miles southeast of the Project. According to the U.S. Geological Survey Watershed Boundary Dataset, the Project is located within the Centennial Wash Hydrologic Unit Code-8 15070104 watershed, which is part of the larger Lower Gila-Aqua Fria Hydrologic Unit Code-6 150701 basin (USGS 2022b).

Field surveys conducted between May 6 and 10, 2023, January 3 and 4, 2024, and August 19 and 22, 2024 identified ephemeral stream features and stream reaches that occur within the project area. The average width of stream features observed within the Project is 3.8 feet (Tetra Tech 2024a). The larger stream features that occur within the project area originate offsite and merge with the smaller drainages originating onsite before flowing into Centennial Wash (Tetra Tech 2024a).

7.3.2 Groundwater

Groundwater resources and uses in the project area are described in the comprehensive Groundwater Basin Analysis and Modeling Report (Clear Creek Associates, LLC 2025). The Project is in the McMullen Valley groundwater basin, within the Basin and Range Physiographic Province of western Arizona. Agricultural groundwater use is a significant source of consumptive water use within the basin, historically used to provide water for livestock, alfalfa, corn, fruits, and vegetables. McMullen Valley is not within an Arizona State Active Management Area; the project area is also not within an Irrigation

Non-Expansion Area (ADWR 2025). The groundwater storage capacity of the McMullen Valley groundwater basin is estimated to range between 14-to-15.1-million-acre feet (ADWR 2009).

There are no perennial water features within the basin. Basin recharge also occurs from agricultural return flows, introduced in the post-development period (post-1950). Because the McMullen Valley is bounded by mountain ranges to the north, south, and west (except for a narrow exit for the Centennial Wash), they act as natural groundwater flow boundaries (Clear Creek Associates, LLC 2025).

7.3.3 Project area Floodplains

Federal Emergency Management Agency Flood Insurance Rate Map panel 04012C0900C, effective August 8, 2008, identified no mapped 100-year floodplains within the Project (FEMA 2022). Due to the lack of 100-year floodplains, there are no 100-year flood zones with Base Flood Elevations established in the project area.

Most of the Project is located within Zone X, areas of minimal flood risk, and the northeastern portion of the Project is listed as Zone D, areas of undetermined risk (FEMA 2022). The closest 100-year floodplain is associated with Centennial Wash.

7.3.4 Wetlands

A formal wetland delineation conducted in accordance with the U.S. Army Corps of Engineers (USACE) methodologies was completed on the following dates: May 6 to 10, 2023; January 3 to 4, 2024; and August 19 to 22, 2024. This delineation supports the findings that there are no wetlands within the project area (Tetra Tech 2024a). The Applicant submitted an Approved Jurisdictional Determination request to the USACE in January 2025 (SPL-2024-00196) and, in June 2025, received concurrence via email from the USACE that there are no jurisdictional waters in the project area (S. Diebolt, personal communication, June 27, 2025).

7.4 Cultural Resources

A records search was conducted to obtain information on previous archaeological investigations and previously recorded sites within the Project and a 2-mile surrounding buffer (referred to as the Research area) (Tetra Tech 2024b). The records search was conducted through the AZSITE online database, which includes records from the Arizona State Museum and Arizona State University, and included a request for AZSITE global information system shapefiles.

Three previously documented archaeological sites were identified in the Research area. One site is a trail with an associated brown ware sherd. Three grinding slicks are nearby. It was documented in 1994, and its cultural-temporal affiliation is listed as prehistoric Native American. It has been recommended as not eligible for inclusion in the National Register of Historic Places. One site is historic and is a secondary trash deposit; the second site is pre-contact and is a feature with artifacts, although considered ephemeral. The two sites are considered to be ineligible individually (Tetra Tech 2024b).

7.4.1 Class III Cultural Investigations

Proposed development on federal lands requires fulfillment of requirements associated with NEPA and compliance with Section 106 of the National Historic Preservation Act. Based on the limited extent of previous surveys and their age (over 10 years old), a new pedestrian cultural resources survey was completed in July 2024. The survey documented one previously recorded archaeological site, AZ S:2:3(Arizona State Museum), and isolated features and artifacts. Tetra Tech recommended that site AZ S:2:3 (Arizona State Museum) is not eligible for listing in the National Register of Historic Places, and the BLM concurred with this recommendation. Tetra Tech also recommended that the isolated features and isolated artifacts are not eligible for listing in the National Register of Historic Places, and the BLM concurred with this recommendation (Tetra Tech 2025b).

7.5 Native American Tribal Concerns

The BLM will conduct Native American Tribal Consultations with the appropriate tribes during the NEPA process to identify Tribal concerns with the Project. Potentially interested tribes include:

- Ak-Chin Indian Community
- Chemehuevi Indian Tribe
- Cocopah Indian Tribe
- Colorado River Indian Tribe
- Fort McDowell Yavapai Nation
- Fort Mojave Indian Tribe
- Fort Yuma Quechan Tribe
- Gila River Indian Community
- Hopi Tribe of Arizona
- Mescalero Apache Tribe
- Moapa band of Paiute Indians
- Pueblo of Zuni
- Salt River Pima-Maricopa Indian Community
- Tohono O'odham Nation
- Yavapai Apache Nation
- Yavapai-Prescott Indian Tribe

7.6 Paleontological Resources

A Paleontological Resources Assessment Report was prepared for the Project and Potential Fossil Yield Classification rankings of 1 (very low), 2 (low), and U (Unknown) were assigned to the geological units present within the project area (Chronical Heritage 2025). An Unanticipated Discoveries Plan for the Project will be provided to address unknown paleontological resources.

7.7 Visual Resources

According to the BLM Lake Havasu Resource Management Plan (RMP), the Project is located within two Visual Resource Management (VRM) classes: Class III and Class IV, with most of the Project located within Class III (BLM 2007).

The RMP defines objectives for each VRM class as follows (BLM 2007a):

- **VRM Class III –** The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

- **VRM Class IV –** The objective of this class is to provide for management activities that require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer's attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements (BLM 2007).

7.7.1 Visual Resource Assessment

A visual resource assessment was prepared for the Project in coordination with the BLM (Tetra Tech 2024d). Seven Key Observation Points (KOPs) were identified, representing locations where the Project could be visible to the public. Visual simulations were prepared for four of the seven KOPs selected, based on potential visibility and visual sensitivity (see Tetra Tech 2024d, Appendix A). The visual contrast rating analysis completed for the four KOPs determined that although the Project would be visible, the visual change would represent a negligible, low, or moderate contrast within the existing landscape.

7.8 Pesticide Use Proposal

Given the preliminary nature of the Project, the Applicant has not identified whether pesticides would be necessary. However, should pesticides be necessary, the Applicant would use pesticides described in the 2007 *Vegetation Treatments Using Herbicide on Bureau of Land Management Lands in 17 Western States Programmatic EIS* (BLM 2007b), the 2016 *Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States PEIS* (BLM 2016), and the 2023 PEIS *Addressing Vegetation Treatments Using Herbicides* (BLM 2023) to the maximum extent practicable. The Applicant would submit a Pesticide Use Proposal for BLM review and approval if pesticides are required.

7.9 Noise

There are a few sensitive receptors in the vicinity of the Project. The closest residential area is the planned Saguaro Acres Subdivision, located 0.6 mile northwest. Currently, the subdivision primarily consists of vacant, graded lots with seasonal recreational vehicle use, with one developed structure. The nearest occupied residential area is Morenga Palms RV Park and Wenden, located approximately 2.8 miles south and 3.5 miles southwest of the Project, respectively. Due to the distance from nearby sensitive receptors, impacts are anticipated to be negligible. Noise-reducing modifications to equipment are not anticipated to be necessary. Nearby residents would be notified in advance of blasting or pile driving activities, if required during the construction or decommissioning period.

7.10 Other Resource Considerations

The Project is not within a wilderness area as defined by the Lake Havasu RMP, nor are there existing developed recreation sites (BLM 2007a).

According to the BLM Lake Havasu RMP's Final Environmental Impact Statement, the planning area provides several regionally recognized opportunities for motorized access and recreation utilizing public lands. The Final Environmental Impact Statement reported on findings by Arizona State Parks

that 34 percent of the households in La Paz County are off-highway vehicle (OHV) users and 5 percent of Arizona OHV trip destinations were to La Paz County (BLM 2006).

There are no BLM-designated OHV areas within the project area (BLM 2025); however, per Applicant correspondence with local OHV club, the 'AZ Desert Riders', Low Mountain Road is used by OHV riders to connect to the trail that runs along the existing WAPA transmission corridor. Access to the trail and to areas north and east of the project area is provided by Low Mountain Road and 77th Street. These roads will remain open, except for brief, temporary closures that may be required during construction.

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USDA NRCS (U.S. Department of Agriculture Natural Resources Conservation Service). 2024. Web Soil Survey. Available online at: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed December 2024.

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APPENDIX A: LEGAL LAND DESCRIPTION

EXHIBIT "A" **DESCRIPTION – TRANSMISSION EASEMENT**

BRIGHTNIGHT **LA PAZ COUNTY**
EAGLE EYE PROJECT

A TRANSMISSION EASEMENT, SITUATED IN SECTIONS 17, 20, 21, 28, 29 & 33, TOWNSHIP 7 NORTH, RANGE 12 WEST, AND SECTIONS 4 & 9, TOWNSHIP 6 NORTH, RANGE 12 WEST, GILA AND SALT RIVER BASE AND MERIDIAN, LA PAZ COUNTY, ARIZONA, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID SECTION 20, TOWNSHIP 7 NORTH, RANGE 12 WEST, BEING A FOUND 2.5 INCH BRASS CAP;

THENCE SOUTH 08°52'07" EAST, A DISTANCE OF 221.45 FEET TO THE **POINT OF BEGINNING;**

THENCE OVER AND ACROSS SAID SECTIONS 17, 20, 21, 28, 29, AND 33, TOWNSHIP 7 NORTH, RANGE 12 WEST AND SECTIONS 4 AND 9, TOWNSHIP 6 NORTH, RANGE 12 WEST THE FOLLOWING ELEVEN (11) COURSES AND DISTANCES;

1. NORTH 33°52'45" EAST, A DISTANCE OF 1352.96 FEET;
2. SOUTH 56°07'07" EAST, A DISTANCE OF 5102.21 FEET;
3. SOUTH 56°06'06" EAST, A DISTANCE OF 306.36 FEET;
4. SOUTH 82°07'37" EAST, A DISTANCE OF 141.22 FEET;
5. SOUTH 07°47'55" WEST, A DISTANCE OF 171.60 FEET;
6. SOUTH 82°11'39" EAST, A DISTANCE OF 614.41 FEET;
7. SOUTH 07°47'40" WEST, A DISTANCE OF 431.40 FEET;
8. NORTH 82°11'53" WEST, A DISTANCE OF 614.72 FEET;
9. SOUTH 07°48'04" WEST, A DISTANCE OF 1617.88 FEET;
10. SOUTH 12°12'38" EAST, A DISTANCE OF 4091.03 FEET;
11. SOUTH 12°12'38" EAST, A DISTANCE OF 13060.93 FEET TO A POINT ON THE SOUTH LINE OF SAID SECTION 4;

THENCE ALONG SAID SOUTH LINE OF SECTION 4, SOUTH 89°56'52" EAST, A DISTANCE OF 544.43 FEET;

THENCE SOUTH 00°37'28" EAST, A DISTANCE OF 2648.88 FEET TO A POINT ON THE SOUTH LINE OF THE NORTH HALF OF SAID SECTION 9;

THENCE ALONG THE SAID SOUTH LINE OF THE NORTH HALF OF SECTION 9, SOUTH 89°33'33" WEST, A DISTANCE OF 1021.48 FEET;

THENCE OVER AND ACROSS SAID SECTIONS 4 AND 9, TOWNSHIP 6 NORTH, RANGE 12 WEST AND SAID SECTIONS 20, 28, 29 AND 33, TOWNSHIP 7 NORTH, RANGE 12 WEST THE FOLLOWING THREE (3) COURSES AND DISTANCES;

1. NORTH 12°12'38" WEST, A DISTANCE OF 15958.61 FEET;
2. NORTH 12°12'38" WEST, A DISTANCE OF 5570.73 FEET;
3. NORTH 56°07'02" WEST, A DISTANCE OF 4467.10 FEET TO THE **POINT OF BEGINNING**.

CONTAINING 692.741 ACRES (30,175,787 SQ. FT.) OF LAND, MORE OR LESS.

REVISIONS

NO.	DATE	BY	DESCRIPTION

PROJ. NO. 1024090798
PREPARED BY: TYLER G. TRUJILLO
DATE PREPARED: 10/27/2025
FOR AND ON BEHALF OF SURVEYING AND MAPPING, LLC
488 EAST WINCHESTER ST., SUITE 125
MURRAY UT, 84107 – 385.255.0115
90798 - GENTIE BLM - LEGAL.docx
PRINTED: 10/30/2025 9:28:00 AM Cy Weaver

PREPARED BY:

_____

TYLER G. TRUJILLO DATE
PROFESSIONAL LAND SURVEYOR
ARIZONA REGISTRATION NO. 76803
FOR AND ON BEHALF OF SURVEYING AND MAPPING, LLC

NOTES:

1. SEE THE ATTACHED EXHIBIT “B” BY WHICH THIS REFERENCE IS MADE PART HEREOF.
2. THE INTENT OF THIS DESCRIPTION IS TO DEFINE A PROPOSED SITE LOCATION FOR THE PURPOSE OF COUNTY PERMITTING.
3. THIS DESCRIPTION WAS PREPARED WITHOUT THE BENEFIT OF A TITLE COMMITMENT, THEREFORE SURVEYING AND MAPPING HAS NOT RESEARCHED OR SHOWN ANY OTHER EASEMENTS, RIGHTS OF WAY, VARIANCES AND OR AGREEMENTS OF RECORD EXCEPT AS SHOWN HEREON.
4. BEARINGS SHOWN HEREON ARE BASED ON GPS OBSERVATIONS AND/OR THE ONLINE POSITIONING USER SERVICE OFFERED BY THE N.G.S., NAD83, WEST ZONE, INTERNATIONAL FOOT AND IS REFERENCED TO WEST LINE OF SECTION 20, TOWNSHIP 7 NORTH, RANGE 12 WEST, BASED ON THE SOUTHWEST CORNER OF SAID SECTION 20 ON THE SOUTH AND THE NORTHWEST CORNER OF SAID SECTION 20 ON THE NORTH, BOTH BEING FOUND 2.5 INCH BRASS CAPS, AND WHICH BEARS NORTH 00°11’12” WEST.

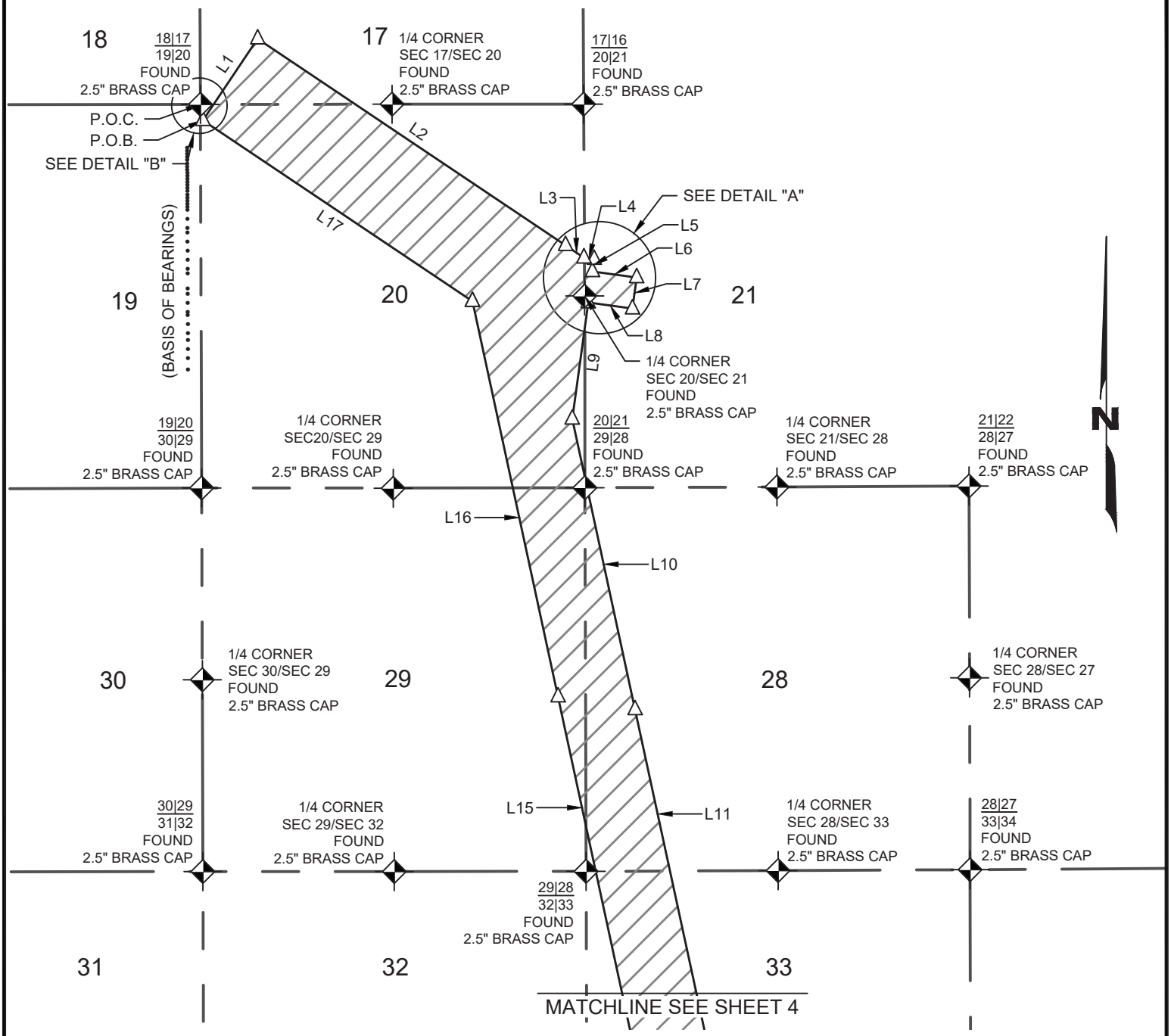
REVISIONS

NO.	DATE	BY	DESCRIPTION

EXHIBIT "B"

SITE EXHIBIT

LOCATED IN SECTIONS 17, 20, 21, 28, 29, & 33 - TOWNSHIP 7 NORTH, RANGE 12 WEST, AND
SECTIONS 4, & 9 - TOWNSHIP 6 NORTH, RANGE 12 WEST, G.& S.R.B.&M.
LA PAZ COUNTY, ARIZONA



LEGEND

- SECTION LINE
- SECTION QUARTER LINE
- FLYTIE
- SECTION CORNER (AS NOTED)
- CALCULATED POINT
- P.O.B. POINT OF BEGINNING
- P.O.C. POINT OF COMMENCEMENT
- PROPOSED SITE BOUNDARY

0 2000' 4000'

GRAPHIC SCALE

TYLER G. TRUJILLO DATE
REGISTERED PROFESSIONAL LAND SURVEYOR
NO. 76803 - STATE OF ARIZONA

JOB NUMBER:	90798
DATE:	10/22/2025
SCALE:	1" = 2000'
SURVEYOR:	T. TRUJILLO
TECHNICIAN:	C. WEAVER
CHECKED BY:	---
DRAWING:	90798 - GENTIE-ACC BLM.DWG

SURVEYING AND MAPPING LLC (SAM)
488 East Winchester St.
Suite 125
Murray, UT 84107
Office: 385.255.0115
Email: info@sam.biz

PROJECT: BrightNight
Eagle Eye

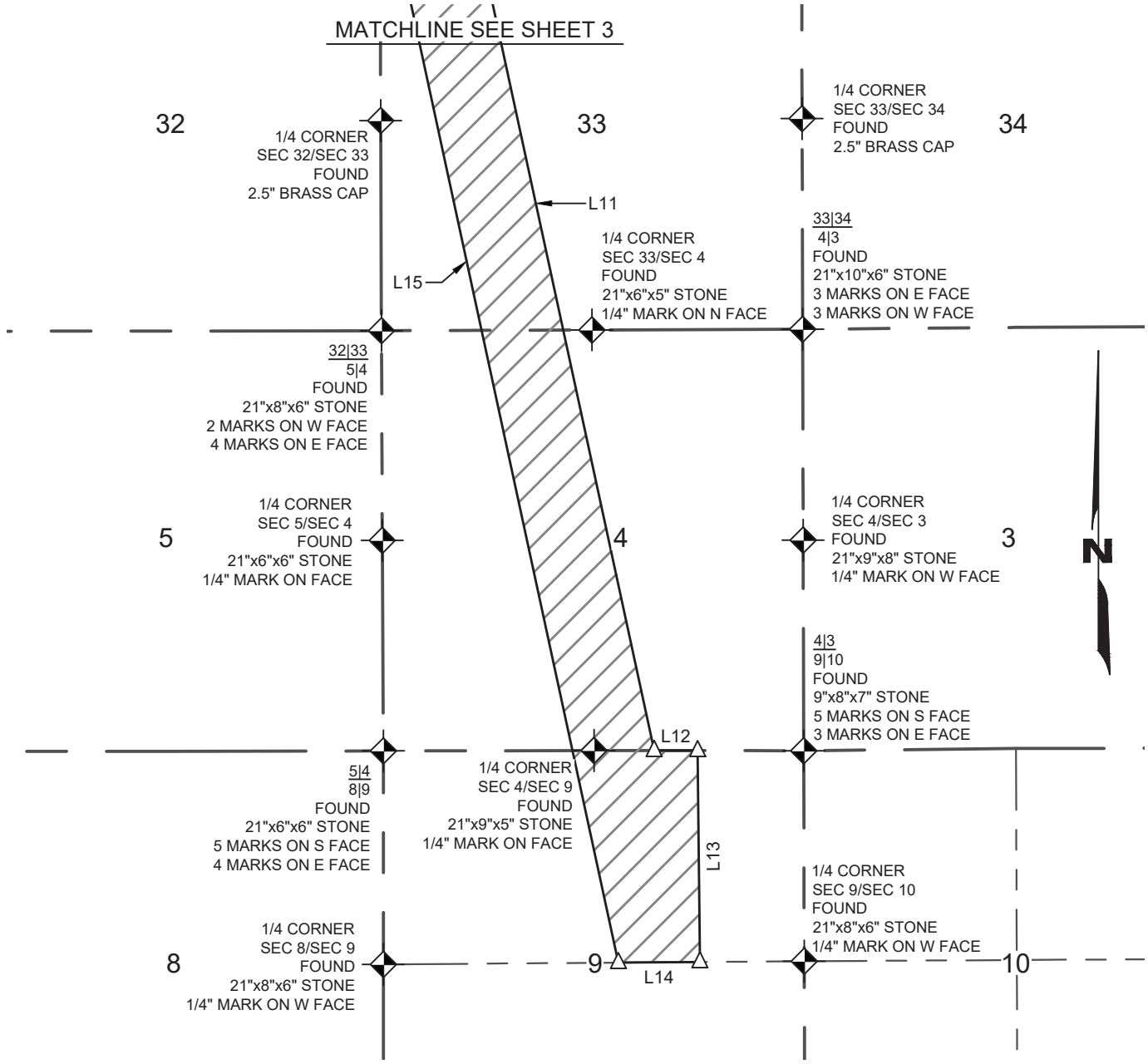
SHEET 3

OF 5

EXHIBIT "B"

SITE EXHIBIT

LOCATED IN SECTIONS 17, 20, 21, 28, 29, & 33 - TOWNSHIP 7 NORTH, RANGE 12 WEST, AND
SECTIONS 4, & 9 - TOWNSHIP 6 NORTH, RANGE 12 WEST, G.& S.R.B.&M.
LA PAZ COUNTY, ARIZONA



LEGEND

- SECTION LINE
- SECTION QUARTER LINE
- FLYTIE
- SECTION CORNER (AS NOTED)
- CALCULATED POINT
- P.O.B. POINT OF BEGINNING
- P.O.C. POINT OF COMMENCEMENT
- PROPOSED SITE BOUNDARY

0 2000' 4000'

GRAPHIC SCALE

TYLER G. TRUJILLO DATE
REGISTERED PROFESSIONAL LAND SURVEYOR
NO. 76803 - STATE OF ARIZONA

JOB NUMBER:	90798
DATE:	10/22/2025
SCALE:	1" = 2000'
SURVEYOR:	T. TRUJILLO
TECHNICIAN:	C. WEAVER
CHECKED BY:	---
DRAWING:	90798 - GENTIE-ACC BLM.DWG

SURVEYING AND MAPPING LLC (SAM)
488 East Winchester St.
Suite 125
Murray, UT 84107
Office: 385.255.0115
Email: info@sam.biz

PROJECT: BrightNight
Eagle Eye

SHEET 4

OF 5

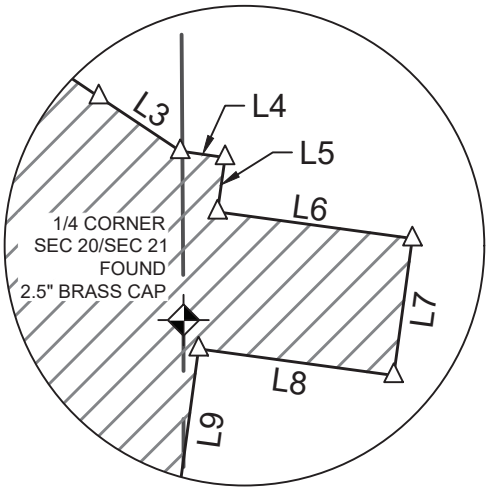
EXHIBIT "B"

SITE EXHIBIT

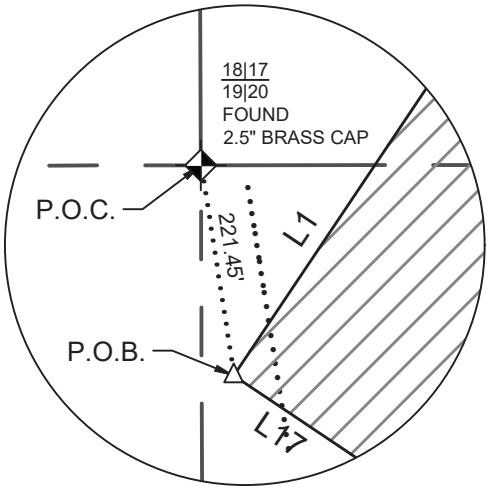
LOCATED IN SECTIONS 17, 20, 21, 28, 29, & 33 - TOWNSHIP 7 NORTH, RANGE 12 WEST, AND SECTIONS 4, & 9 - TOWNSHIP 6 NORTH, RANGE 12 WEST, G.& S.R.B.&M.

LA PAZ COUNTY, ARIZONA

LINE TABLE		
NUMBER	DIRECTION	LENGTH
L1		1352.96'
L2		5102.21'
L3		806.86'
L4		141.22'
L5		171.60'
L6		614.41'
L7		431.40'
L8		614.72'
L9		1617.88'
L10		4091.03'
L11		18060.93'
L12		544.43'
L13		2646.86'
L14		1021.48'
L15		15958.61'
L16		5570.73'
L17		4467.10'



DETAIL "A"
N.T.S.



DETAIL "B"
N.T.S.

N

LEGEND

- SECTION LINE
- SECTION QUARTER LINE
- FLYTIE
- SECTION CORNER (AS NOTED)
- CALCULATED POINT
- P.O.B. POINT OF BEGINNING
- P.O.C. POINT OF COMMENCEMENT
- PROPOSED SITE BOUNDARY

TYLER G. TRUJILLO DATE
REGISTERED PROFESSIONAL LAND SURVEYOR
NO. 76803 - STATE OF ARIZONA

JOB NUMBER:	90798
DATE:	10/22/2025
SCALE:	N/A
SURVEYOR:	T. TRUJILLO
TECHNICIAN:	C. WEAVER
CHECKED BY:	---
DRAWING:	90798 - GENTIE-ACC BLM.DWG

SURVEYING AND MAPPING LLC (SAM)
488 East Winchester St.
Suite 125
Murray, UT 84107
Office: 385.255.0115
Email: info@sam.biz

PROJECT: BrightNight
Eagle Eye

SHEET 5

OF 5

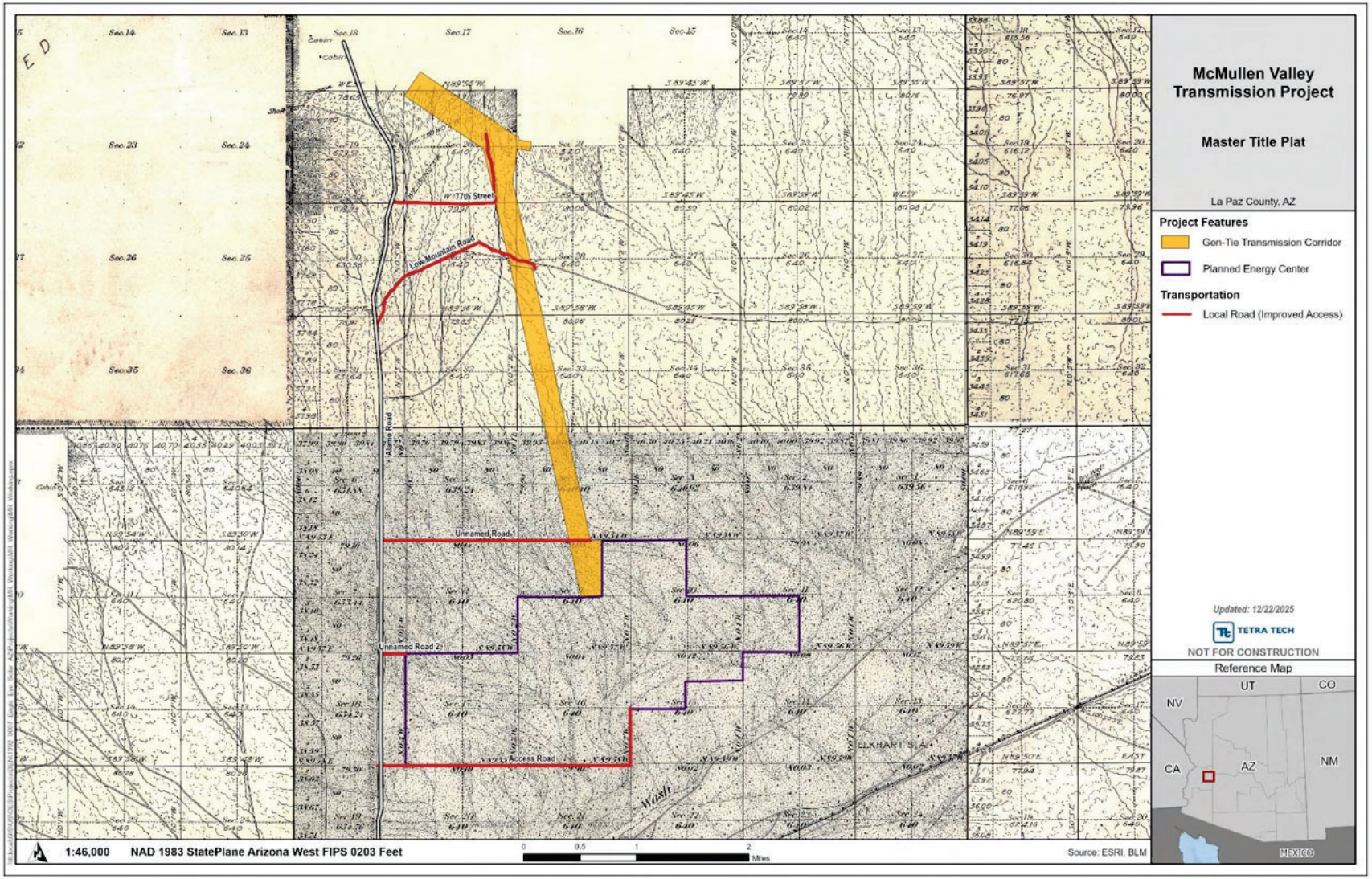


Figure A-1. Master Title Plat

APPENDIX B: APPLICANT FINANCIAL AND CREDIT INFORMATION

Financing Capabilities

BrightNight is a founder-owned, led, and controlled renewable power company focused on providing its customers and partners with differentiated solutions with an equal focus on value, reliability, and best-in-class execution. In December 2021, BrightNight closed a $500m investment from Global Infrastructure Partners (GIP). GIP is a leading independent infrastructure fund manager that makes equity and debt investments in infrastructure assets and businesses. GIP's investment in BrightNight provides sufficient capital to fund the development of the company's 31+ GW project pipeline.

In December 2021, BrightNight closed a $500M investment from Global Infrastructure Partners (GIP). GIP is a leading independent infrastructure fund manager that makes equity and debt investments in infrastructure assets and businesses. GIP's investment in BrightNight provides sufficient capital to fund the development of the company's 31+ GW project pipeline. In December 2023, BrightNight raised a $375M corporate credit facility of which $200M is allocated for PPA LC postings. In August of 2024, BrightNight secured a $440 million equity investment by Goldman Sachs Alternatives and a $400 million corporate facility, providing the financial strength and resiliency to advance projects to completion even during uncertain market conditions.

In May 2024, BrightNight and its joint venture partner Cordelio, secured a $414M million construction credit facility for their Box Canyon power project in Pinal County, Arizona. BrightNight and Cordelio are co-members of BOCA bn, LLC, the owner of the Box Canyon project. Construction of this 300MW project began in December 2023 and is expected to begin operation in 1H 2025. BrightNight's experience with securing financing for the Box Canyon project demonstrates our ability to execute the financing activities associated with a utility-scale development project.

As part of this proposal, BrightNight is offering projects that are wholly owned by BrightNight. The capital required for construction costs will be sourced from external capital providers using a combination of project debt financing and equity from the project sponsor. Depending on market conditions, the anticipated capital stack to complete project construction is expected to consist of 20% sponsor equity and 80% project debt financing, including non-recourse project debt and tax equity or tax credit transfer.

BrightNight's preferred project ownership structure for the project uses back-leveraged debt financing and tax equity to reduce the cost of capital to the project and allows us to provide a lower cost of energy to customers. A special purpose entity will retain ownership of all the respective project assets and will be Oracle's counterparty for the PPA. An indirect parent of the project company will be jointly owned by BrightNight (or an affiliate of BrightNight) and a tax equity partner. BrightNight will obtain back-leverage debt from an investment-grade financial institution to reduce the cost of capital for its portion of the required equity.

BrightNight's team members have a long history of activity in the capital markets successfully securing construction financing, tax equity, back-leverage, and other forms of financing for 20+ GW of conventional and renewable energy projects. Our teams have long-term and extensive relationships in

the financial market and is in regular contact with large institutional lenders who would welcome the chance to provide project financing for the proposed projects, based on the track record of the BrightNight and Cordelio teams.

Below is a list of financial institutions that the BrightNight team has worked with in the past, and who are representative of the ultimate investors in the proposed projects.

Potential Financial Partners

APPENDIX C: USFWS INFORMATION FOR PLANNING AND CONSULTATION LETTER AND ARIZONA GAME AND FISH DEPARTMENT ENVIRONMENTAL REVIEW TOOL RESULTS

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To: 12/03/2025 18:28:34 UTC
Project Code: 2026-0022344
Project Name: McMullen Valley TransmissionLine Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and it's critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.
If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see https://www.fws.gov/law/bald-and-golden-eagle-protection-act and https://www.fws.gov/program/eagle-management).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: https://www.fws.gov/program/migratory-bird-permit. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit this link or visit https://www.fws.gov/program/national-

wildlife-refuge-system to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John_Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/project-evaluation-program/).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

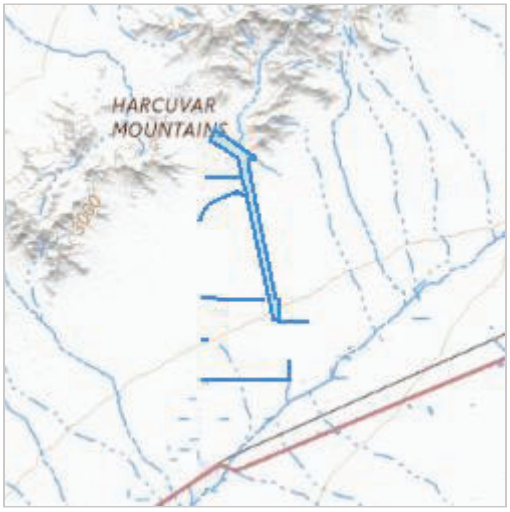
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
(602) 242-0210

PROJECT SUMMARY

Project Code: 2026-0022344
Project Name: McMullen Valley TransmissionLine Project
Project Type: Power Gen - Other
Project Description: EAGL, LLC is proposing to construct a new single-circuit 230-kV gen-tie line (and substation on private land) to facilitate the interconnection of the McMullen Valley Transmission Project with the existing Western Area Power Administration (WAPA) Harcuvar Substation, on BLM-administered land. The project is located approximately 3 miles north of Wenden and approximately 100 miles west of Phoenix, Arizona, in La Paz County. The BLM right-of-way requested is for a 740-acre Application Area.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@33.884851350000005,-113.53041622489211,14z



Counties: La Paz County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Southwestern Willow Flycatcher *Empidonax traillii extimus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

FISHES

NAME	STATUS
Gila Topminnow (incl. Yaqui) *Poeciliopsis occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1116	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

---

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

---

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Costa's Hummingbird *Calypte costae* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470	Breeds Jan 15 to Jun 10
Gila Woodpecker *Melanerpes uropygialis* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31
Lawrence's Goldfinch *Spinus lawrencei* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

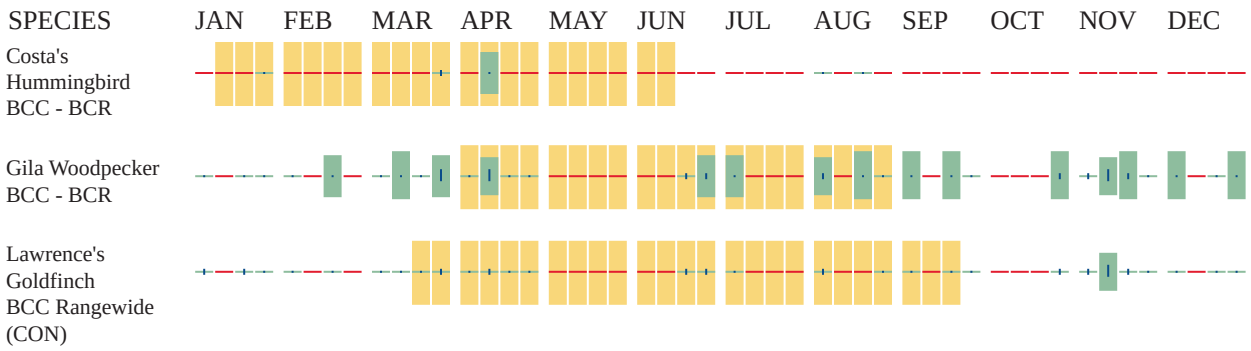
Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- R4SBJ
- R5UBFx
- R4SBC

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Laura Megill
Address: 365 E. Robindale Road
City: Las Vegas
State: NV
Zip: 89123
Email lamegill@gmail.com
Phone: 7025105397

Arizona Environmental Online Review Tool Report

Arizona Game and Fish Department Mission
To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department requests further coordination to provide project/species specific recommendations. Please use the Project Evaluation Form to submit your project to the Project Evaluation Program at PEP@azgfd.gov.

Project Name:
EE Gen-Tie and Access Roads

Project Type:
Energy Production/Storage/Transfer, Energy Production (generation), photovoltaic solar facility (new/expansion)

Project ID:
HGIS-26889

Project Description:
Gen-tie and Access Road assessment

Contact Person:
Yancey Bissonnette

Organization:
Tetra Tech

On Behalf Of:
CONSULTING

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

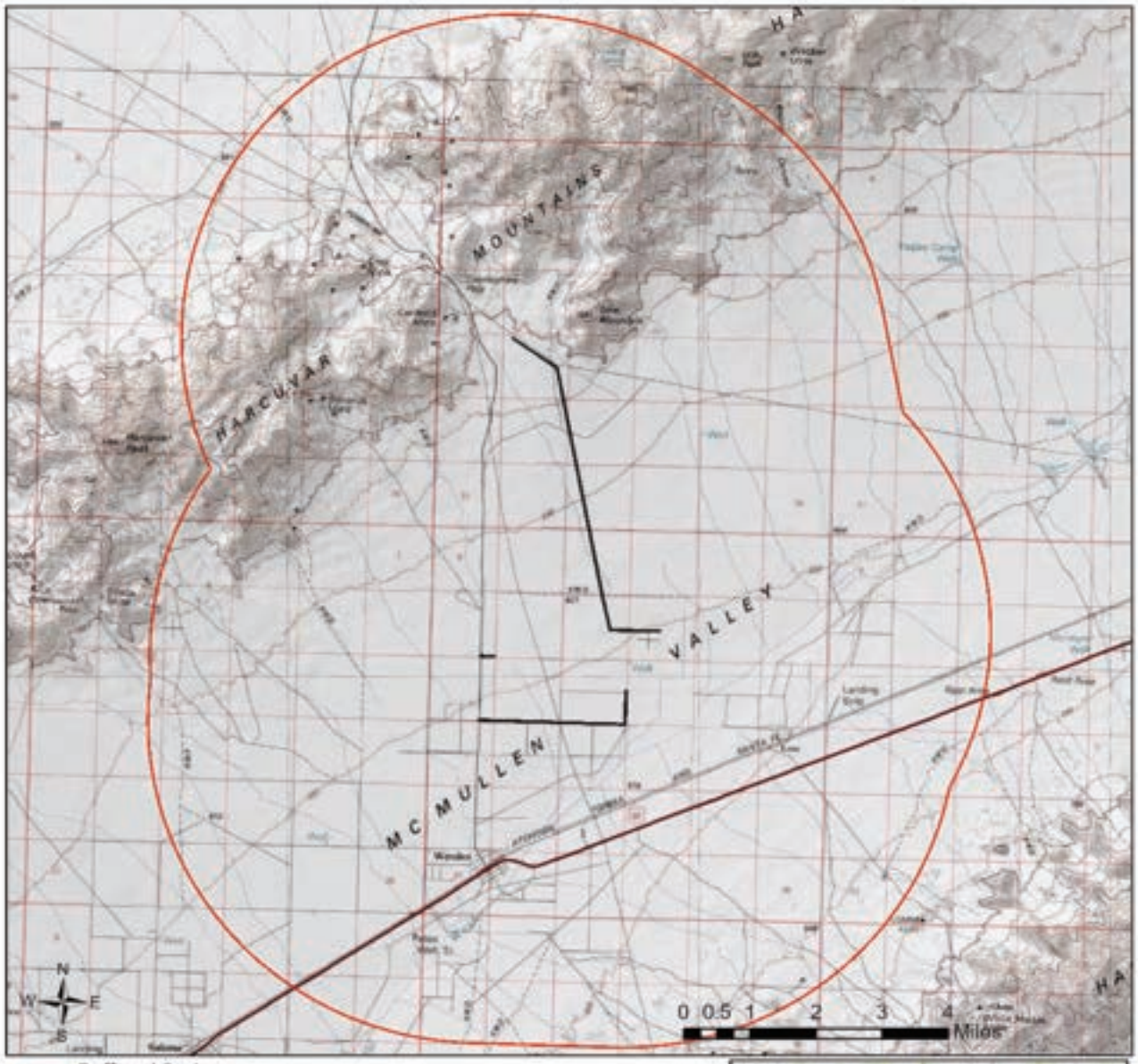
Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
   Project Evaluation Program, Habitat Branch
   Arizona Game and Fish Department
   5000 West Carefree Highway
   Phoenix, Arizona 85086-5000
   Phone Number: (623) 236-7600
   Fax Number: (623) 236-7366
   Or
   PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.

EE Gen-Tie and Access Roads

USA Topo Basemap With Locator Map



Buffered Project Boundary

Project Boundary

Project Size (acres): 69.62

Lat/Long (DD): 33.9035 / -113.5177

County(s): La Paz

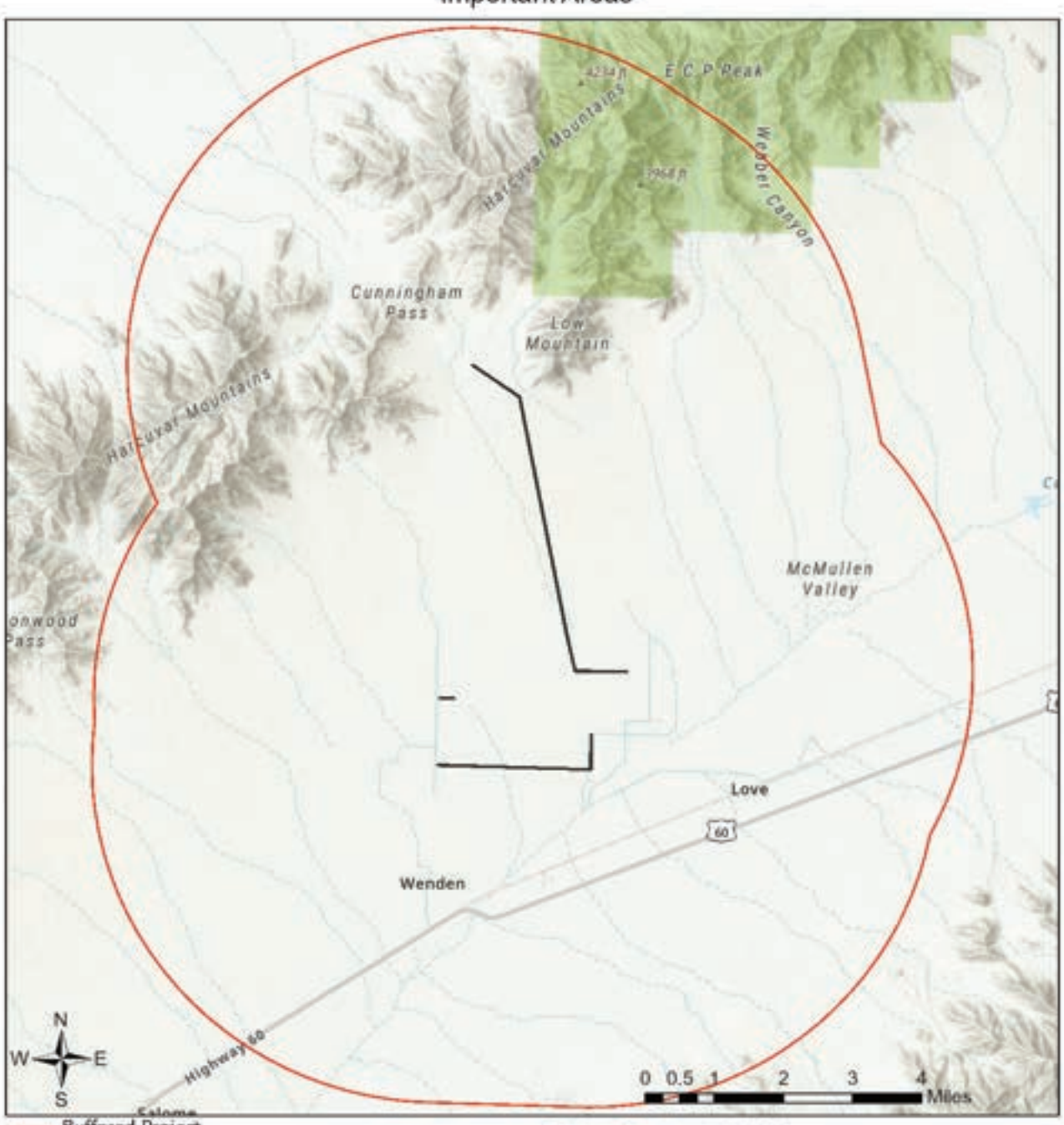
AGFD Region(s): Yuma

Township/Range(s): T6N, R12W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME +

EE Gen-Tie and Access Roads

Important Areas



- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Wildlife Connectivity

Project Size (acres): 69.62

Lat/Long (DD): 33.9035 / -113.5177

County(s): La Paz

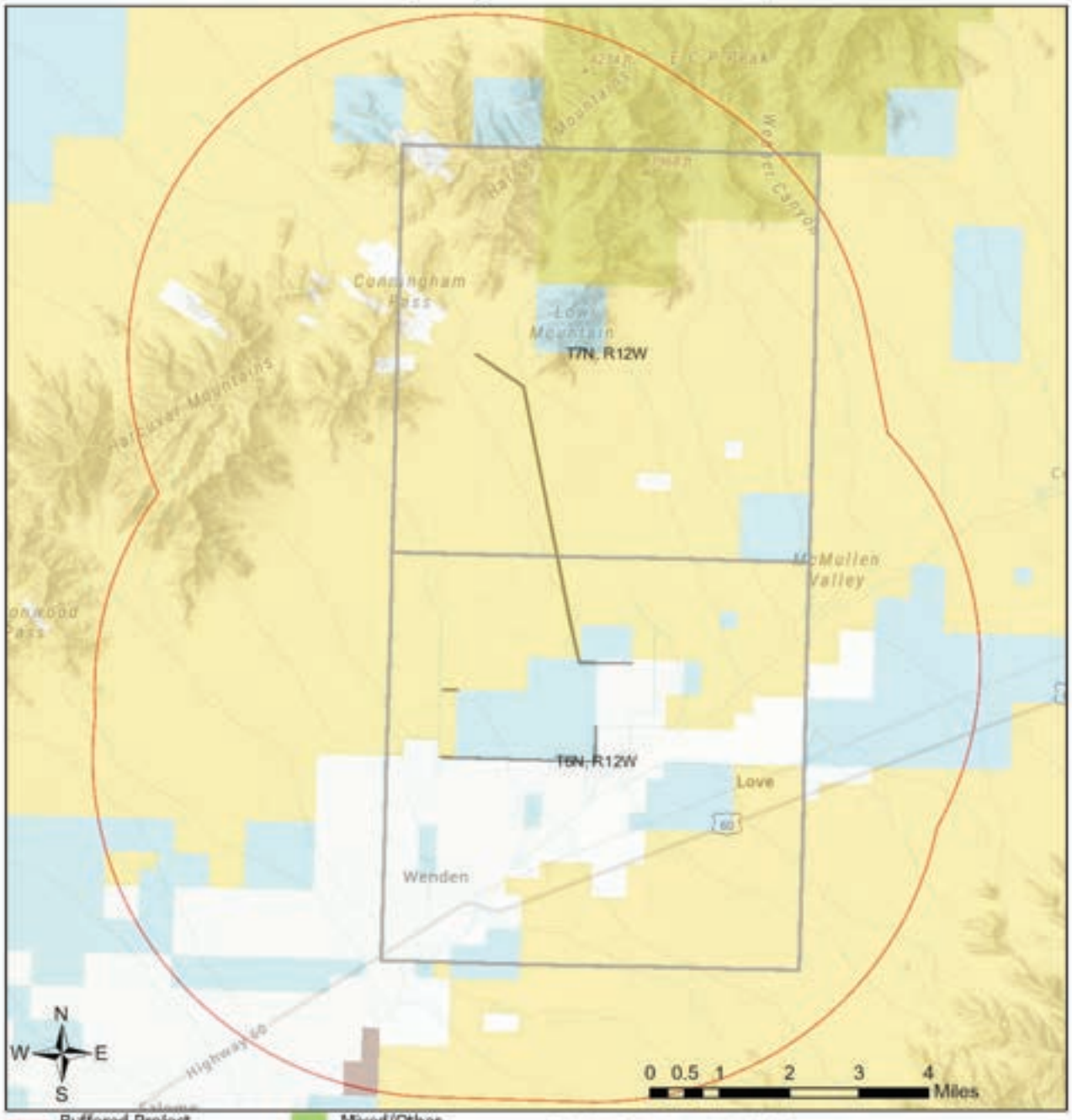
AGFD Region(s): Yuma

Township/Range(s): T6N, R12W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME +

EE Gen-Tie and Access Roads

Township/Ranges and Land Ownership



- Buffered Project Boundary
- Project Boundary
- AZ Game & Fish Dept.
- BLM
- BOR
- Indian Res.
- Military
- Mixed/Other
- National Park/Mon.
- Private
- State & Regional Parks
- State Trust
- US Forest Service
- Wildlife Area/Refuge
- Township/Ranges

Project Size (acres): 69.62
Lat/Long (DD): 33.9035 / -113.5177
County(s): La Paz
AGFD Region(s): Yuma
Township/Range(s): T6N, R12W; T7N, R12W
USGS Quad(s): CUNNINGHAM PASS; SALOME +

Special Status Species Documented within 5 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammospermophilus harrisii	Harris' Antelope Squirrel					2
Chaetodipus baileyi	Bailey's Pocket Mouse					2
Crotalus pyrrhus	Southwestern Speckled Rattlesnake					2
Echinomastus johnsonii	Johnson's Fishhook Cactus				SR	
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Heloderma suspectum	Gila Monster					1
Incilius alvarius	Sonoran Desert Toad					2
Lanius ludovicianus	Loggerhead Shrike					2
Macrotus californicus	California Leaf-nosed Bat			S		2
Mammillaria viridiflora	Varied Fishhook Cactus				SR	
Micruroides euryxanthus	Sonoran Coralsnake					2
Myotis velifer	Cave Myotis			S		2
Perognathus amplus	Arizona Pocket Mouse					2
Phrynosoma solare	Regal Horned Lizard					2
Rana yavapaiensis	Lowland Leopard Frog		S	S		1
Toxostoma bendirei	Bendire's Thrasher					2
Toxostoma lecontei	LeConte's Thrasher			S		2

Note: Status code definitions can be found at https://www.azgfd.com/wildlife-conservation/on-the-ground-conservation/state-wildlife-action-plan/state-wildlife-action-plan-status-definitions/.

Special Areas Documented that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Harcuvar Mtns -Harquahala Mtns	Maricopa County Wildlife Movement Area - Landscape					

Note: Status code definitions can be found at https://www.azgfd.com/wildlife-conservation/on-the-ground-conservation/state-wildlife-action-plan/state-wildlife-action-plan-status-definitions/.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammospermophilus harrisii	Harris' Antelope Squirrel					2
Anarhynchus montanus	Mountain Plover					2
Anaxyrus microscaphus	Arizona Toad	UR		S		2
Anthus spragueii	Sprague's Pipit					2
Aquila chrysaetos	Golden Eagle			S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					3
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Auriparus flaviceps	Verdin					2
Buteo regalis	Ferruginous Hawk			S		2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Calcarius ornatus	Chestnut-collared Longspur					2
Calypte costae	Costa's Hummingbird					2
Campylorhynchus brunneicapillus	Cactus Wren					2
Catharus ustulatus	Swainson's Thrush					2
Chaetodipus baileyi	Bailey's Pocket Mouse					2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Colaptes chrysoides	Gilded Flicker			S		2
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat		S	S		1
Empidonax wrightii	Gray Flycatcher					2
Eumops perotis californicus	Greater Western Bonneted Bat			S		2
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon		S	S		1
Falco sparverius	American Kestrel					2
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Heloderma suspectum	Gila Monster					1
Icterus bullockii	Bullock's Oriole					2
Icterus cucullatus	Hooded Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Lanius ludovicianus	Loggerhead Shrike					2
Lasiurus cinereus	Hoary Bat					2
Lasiurus xanthinus	Western Yellow Bat		S			2
Macrotus californicus	California Leaf-nosed Bat			S		2
Megascops kennicottii	Western Screech-owl					2
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolnii	Lincoln's Sparrow					2
Melozone aberti	Abert's Towhee		S			2
Micrathene whitneyi	Elf Owl					3
Myotis velifer	Cave Myotis			S		2
Myotis yumanensis	Yuma Myotis					2
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2
Nyctinomops macrotis	Big Free-tailed Bat					2
Passerculus sandwichensis	Savannah Sparrow					2
Perognathus amplus	Arizona Pocket Mouse					2
Phrynosoma solare	Regal Horned Lizard					2
Pooecetes gramineus	Vesper Sparrow					2
Rana yavapaiensis	Lowland Leopard Frog		S	S		1
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Toxostoma bendirei	Bendire's Thrasher					2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Toxostoma lecontei	LeConte's Thrasher			S		2

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Odocoileus hemionus	Mule Deer					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Energy Production/Storage/Transfer, Energy Production (generation), photovoltaic solar facility (new/expansion)

Project Type Recommendations:
During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and it is important to identify and conserve upland wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife species. Guidelines for many of these can be found at: https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/.

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. 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. The AZGFD recommends using only the minimum amount of light needed for safety, especially in areas immediately adjacent to open space or undeveloped lands. The AZGFD encourages the use of motion sensing lighting and narrow spectrum lighting (amber or warm tones typically 2700 Kelvin or lower) wherever possible to lower the range of species affected by lighting. Also, please consider shielding, canting, or cutting all lighting, where possible, to ensure that light reaches only areas needing illumination and to minimize impacts to nocturnal wildlife.

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 for a list of prohibited and restricted noxious weeds at https://www.invasivespeciesinfo.gov/ and the Arizona Native Plant Society https://aznps.com/invas for recommendations on how to control these species. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at https://imap.natureserve.org/imap/services/page/map.html.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select “See What’s Here” for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

Evaluate potential impacts to wildlife and fish species due to changes in access to water, water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods). Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing the project to minimize impacts to spawning fish and other aquatic species. Wash, drain, and dry equipment to reduce the spread of exotic invasive species. AZGFD recommends early coordination with the Project Evaluation Program (PEP@azgfd.gov) for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

The AZGFD recommends that wildlife surveys are conducted to determine if noise-sensitive species, such as birds or mammals, occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

The AZGFD recommends following the Avian Power Line Interaction Committee (APLIC) guidelines for new power lines, which can be found in the current version of *Suggested Practices for Avian Protection on Power Lines and Reducing Avian Collisions with Power Lines*. Large bodied birds, such as hawks, owls, vultures, and eagles, may be vulnerable to line strikes and electrocution during construction and operation of power lines and substations; power poles can also serve as perches for large-bodied birds. These potential impacts can be avoided or minimized by following the APLIC guidelines which include designing the power lines with enough space between energized components to reduce the likelihood of a bird electrocution or installing bird flight diverters in sections of line where elevated bird strikes are anticipated (e.g. lines over water bodies or in the path of colonial roosting locations). The AZGFD’s Raptor Coordinator, who can be contacted at raptors@azgfd.gov or 623-236-7575, can provide further information on specific design features and best management practices.

The AZGFD recommends that a qualified biologist conduct a survey for nesting birds within the project area prior to removal or trimming of trees/vegetation, if the removal or trimming occurs during the breeding season (the Project Evaluation Program can be contacted at PEP@azgfd.gov or 623-236-7600 to determine the appropriate breeding season within the project area). Trees and/or vegetation within the project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA) and protected under state law. If it is anticipated the project will not be in compliance with MBTA, the AZGFD recommends contacting the U.S. Fish and Wildlife Service (https://www.fws.gov/office/arizona-ecological-services) for technical assistance. The USFWS will provide options to comply with the MBTA.

The AZGFD recommends revegetating disturbed areas with native drought-tolerant species that represent the natural surrounding landscape. Landscaping with native plants can help support wildlife and pollinator species in the area while reducing dust and erosion. In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts. The AZGFD also recommends the development of a short and long-term monitoring plan, including adaptive management guidelines to address invasive species control and maintain native vegetation.

Project Location and/or Species Recommendations:
HDMS records indicate that one or more native plants listed on the **Arizona Native Plant Law and Antiquities Act** have been documented within the vicinity of your project area. Please contact:
Arizona Department of Agriculture
1688 W Adams St.
Phoenix, AZ 85007
Phone: 602.542.4373
https://agriculture.az.gov/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf starts on page 44

Analysis indicates that your project is located in the vicinity of an identified ***wildlife habitat connectivity feature***. The **County-level Stakeholder Assessments** contain five categories of data (Barrier/Development, Wildlife Crossing Area, Wildlife Movement Area- Diffuse, Wildlife movement Area- Landscape, Wildlife Movement Area- Riparian/Washes) that provide a context of select anthropogenic barriers, and potential connectivity. The reports provide recommendations for opportunities to preserve or enhance permeability. Project planning and implementation efforts should focus on maintaining and improving opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer to: https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-identifying-corridors/.
Please contact the Project Evaluation Program (pep@azgfd.gov) for specific project recommendations.

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at https://www.fws.gov/office/arizona-ecological-services or:

Phoenix Main Office
9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

HDMS records indicate that **Sonoran Desert Tortoise** have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/2014%20Tortoise%20handling%20guidelines.pdf.