Volume III 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 #
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EXHIBIT C
AREAS OF BIOLOGICAL WEALTH

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

Describe any areas in the vicinity of the proposed site or route which are unique because of biological wealth or because they are habitats for rare and endangered species. Describe the biological wealth or species involved and state effects, if any, the proposed facilities will have thereon.

Introduction

Areas of biological wealth and the rare and endangered species that may occur at or in the vicinity of the Eagle Eye Thermal Plant and Gen-Tie Project (Project) were identified through a biotic resource review conducted by KP Environmental, Inc. (KPE). The data sources consulted for the review include:

- Topographical and aerial maps and land use, land cover, and elevation data (Google Earth, 2026).
- The U.S. Fish and Wildlife Service (USFWS) species list for the Project, obtained from the USFWS online Information for Planning and Consultation (IPaC) system (**Exhibit C-1**) and shown in **Table C-1**.
- Species information obtained from the USFWS Environmental Conservation Online System, the USFWS Arizona Ecological Services document library, and the Arizona Game and Fish Department (AZGFD) Online Environmental Review Tool (ERT) (**Exhibit C-2**) and special status species listed in the AZGFD Heritage Data Management System (HDMS) within La Paz County (**Table C-2,** *Special Status Species with the Potential to Occur in La Paz County*).
- Threatened and Endangered Species Memorandum for the Eagle Eye Energy Center in La Paz County, Arizona (February 2026).

The AZGFD Online ERT database query establishes a buffer beyond the Project site to search for occurrence records and the presence of modeled habitat. The size of the buffer depends on the type of project being considered. For this Project, the buffer is five miles beyond the Project Thermal Plant and Gen-Tie as defined by the AZGFD Online ERT. The ERT and Project boundary were submitted online though AZGFD's Project Evaluation Program (PEP). The results of the AZGFD PEP are included in a letter as **Exhibit C-3.**

Laws and Policies

Special-status plant and wildlife species are subject to regulations under the authority of federal and state agencies. Special status species related to the proposed Project include those species that are listed by the USFWS as federal endangered, threatened, proposed, or candidate species under the Endangered Species Act of 1973 (ESA), Section 4, as amended; protected under the Migratory Bird Treaty Act (MBTA); protected as Birds of Conservation Concern (BCC); listed as Species of Greatest Conservation Need (SGCN) by AZGFD; protected under the Bald and Golden Eagle

Protection Act (BGEPA), or are protected under the Arizona Native Plant Law (ANPL) administered by the Arizona Department of Agriculture (AZDA). Descriptions of special status species are listed below:

- Endangered species (federal) are those species in danger of extinction throughout all or a significant portion of their range.
- Threatened species (federal) are those species likely to become endangered in the foreseeable future.
- Proposed species (federal) are those species recommended for listing under Section 4 of the ESA.
- Candidate species (federal) are those species for which the USFWS has sufficient information on their biological status and threats to propose them as endangered or threatened under the ESA, but for which development of a proposed listing regulation is precluded by other higher priority listing activities. Candidate species are not protected under the ESA.
- Candidate Conservation Agreement (CCA, federal) is a voluntary agreement between the U.S. Fish and Wildlife Service and other parties, such as federal or state agencies, tribes, local governments, or private landowners, to protect species that may soon require listing under the Endangered Species Act. Candidate species already have enough scientific evidence to qualify for protection, but formal listing is delayed due to higher priorities. Because these species are not yet legally protected under the ESA, CCAs encourage early, cooperative conservation actions.
- Under Review (UR) is a petitioned species under the U.S. ESA and is considered an at-risk species. While not yet officially listed as threatened or endangered.
- USFWS Species of Concern is an informal term that refers to those species that the USFWS believes may need concentrated conservation actions. Conservation actions, such as monitoring, vary depending on the health of the populations and degree and types of threats. USFWS Species of Concern receive no legal protection under the ESA and the use of the term does not necessarily mean that the species will eventually be proposed for listing as a threatened or endangered species.
- AZGFD SGCN are species determined to be vulnerable in at least one of the following eight criteria: extirpated from Arizona; federal or state status; declining status; disjunct status; demographic status; concentration status; fragmentation status; and distribution status, as described by the AZGFD's listing of SGCN (updated November 2022).
- AZDA Highly Safeguarded or Salvage Restricted Native Plants. Special status plants are protected under the Arizona NPL and fall into these categories: Highly Safeguarded (no collection allowed); Salvage Restricted (collection allowed only with permit); Export Restricted (transport out of state prohibited); Salvage Assessed (permits required to remove live trees); and Harvest Restricted (permits required to remove plant by-products).

Inventory

Several surveys and technical reports have been prepared for the Eagle Eye Energy Center (Energy Center), which includes the proposed Thermal Plant and Gen-Tie Project as well as non-jurisdictional components that are not included with this CEC application such as the solar photovoltaic (PV) generation facility and battery energy storage system (BESS). However,

additional biological review of the Thermal Plant site and Proposed Gen-Tie corridor were conducted for this CEC application. These reports were reviewed, and relevant information from field surveys was incorporated alongside available online resources to assess the potential presence of species within the Project area. The findings from these reports and surveys were taken into account for species analysis and **Tables C-1** and **C-2.** The referenced studies are included below:

- Threatened and Endangered Species Memorandum for the Eagle Eye Energy Center in La Paz County, Arizona (Threatened and Endangered Species Memorandum) (February 2026). In support of the desktop review, Tetra Tech Biologists conducted a biological habitat assessment field visit from December 11 – 18, 2025. These surveys were conducted in the vicinity of the Project area and the Thermal Plant site on private land (see **Exhibit C-4).**

The USFWS IPaC tool was used to identify the list of proposed, candidate, threatened, and endangered species that may have the potential to occur in the proposed Project area (USFWS, 2026; **Exhibit C-1**). The results of the IPaC review included the following species: Gila topminnow (incl. Yaqui; *Poeciliopsis occidentali*s, endangered), monarch butterfly (*Danaus plexippu*, proposed threatened), southwestern willow flycatcher (*Empidonax traillii extimus*, endangered), yellow-billed cuckoo (*Coccyzus americanus*, threatened). There is no designated critical habitat in or near the proposed Project. For each of these species, specific habitat requirements, known distribution, and elevation range were evaluated in order to characterize and confirm the potential to occur in the proposed Project area. Based on this evaluation, monarch butterfly, southwestern willow flycatcher and yellow-billed cuckoo have potential to occur in the proposed Project area. **Table C-1** provides potential to occur for species identified in the IPaC report.

The IPaC report also includes a list of migratory birds, including Birds of Conservation Concern (BCC). Species designated as BCC, besides those already designated as federally threatened or endangered, represent USFWS's highest conservation priorities. The IPaC listed the following BCC species with the potential to occur in the Project area: Costa's hummingbird (*Calypte costae*), Gila woodpecker (*Melanerpes uropygialis*), and Lawerence's goldfinch (*Spinus lawrencei*). Based on the habitat in and near the proposed Project, all three species were identified as having the potential to occur in the proposed Project area and are analyzed further.

An Arizona Online ERT Report was completed for the Project on April 16, 2026 (AZGFD, 2026) (Exhibit C-2). The information provided in the ERT report is used to guide preliminary decisions and assessments of proposed land development, management, and conservation projects, while incorporating fish and wildlife resource needs or features. The results of the Project evaluation indicated that the following special status species were documented within five miles of the Project: lowland leopard frog (*Rana yavapaiensis*), Sonoran desert toad (*Incilius alvarius*), Bendire's thrasher (*Toxostoma bendirei*), LeConte's thrasher (*Toxostoma lecontei*), loggerhead shrike (*Lanius ludovicianus*), Arizona pocket mouse (*Perognathus amplus*), Bailey's pocket mouse (*Chaetodipus baileyi*), California leaf-nosed bat (*Macrotus californicus*), cave myotis (*Myotis velifer*), Harris' antelope squirrel (*Ammospermophilus harrisii*), Johnson's fishhook cactus (*Echinomastus johnsonii*), varied fishhook cactus (*Mammillaria viridiflora*), Gila monster (*Heloderma suspectum*), regal horned lizard (*Phrynosoma solare*), Sonoran coralsnake

(*Micruroides euryxanthus*), Sonoran desert tortoise (*Gopherus morafkai*), and southwestern speckled rattlesnake (*Crotalus pyrrhus*). Based on the habitat in and near the proposed Project, Sonoran desert toad, Bendire's thrasher, LeConte's thrasher, loggerhead shrike, Arizona pocket mouse, Bailey's pocket mouse, California leaf-nosed bat, cave myotis, Harris' antelope squirrel, Johnson's fishhook cactus, varied fishhook cactus, Gila monster, regal horned lizard, Sonoran coralsnake, Sonoran desert tortoise, and southwestern speckled rattlesnake were identified as having the potential to occur in the Project area and are analyzed further in the Potential Effects section.

Additionally, the AZGFD ERT identified 51 special status species that may have the potential to occur in the Project area derived from predicted species range models. Based on evaluations of their habitat requirements, known distribution, and range, the following 29 species (excluding duplicate species from the species documented within 5-miles) have potential to occur in the Project area and are analyzed further in the Potential Effects section below; Arizona Toad (*Anaxyrus microscaphus*), Abert's towhee (*Melozone aberti*), American kestrel (*Falco sparverius*), American peregrine falcon (*Falco peregrinus anatum*), Brewer's Sparrow (*Spizella breweri*), Bullock's oriole (*Icterus bullockii*), cactus wren (*Campylorhynchus brunneicapillus*), Costa's hummingbird (*Calypte costae*), elf owl (*Micrathene whitneyi*), ferruginous hawk (*Buteo regalis*), Gila woodpecker, gilded flicker (*Colaptes chrysoides*), golden eagle (*Aquila chrysaetos*), hooded oriole (*Icterus cucullatus*), Lincoln's sparrow (*Melospiza lincolnii*), prairie falcon (*Falco mexicanus*), sagebrush sparrow (*Artemisiospiza nevadensis*), savannah sparrow (*Passerculus sandwichensis*), verdin (*Auriparus flaviceps*), western burrowing owl (*Athene cunicularia hypugaea*), western screech-owl (*Megascops kennicottii*), yellow-billed cuckoo (*Coccyzus americanus*), big free-tailed bat (*Nyctinomops macrotis*), Brazilian free-tailed bat (*Tadarida brasiliensis*), desert red bat (*Lasiurus frantzii*), greater western bonneted bat (*Eumops perotis californicus*), pale townsend's big-eared bat (*Corynorhinus townsendii pallescens*), and Yuma myotis (*Myotis yumanensis*).

AZGFD has published a list of special status species occurring by county in Arizona (AZGFD, 2024). This list was also consulted toward identifying species that may occur in the vicinity of the Project. The full La Paz County species list is included in **Exhibit D-1**.

In summary, the USFWS IPaC Tool identified four (4) federally listed, or proposed for listing species that may have the potential to occur in the Project area. After evaluation of the habitat requirements, range, and distribution of these species, only three (3) of these species, monarch butterfly, southwestern willow flycatcher, and yellow-billed cuckoo have potential to occur in the proposed Project area, the remaining species are not analyzed further. The AZGFD ERT identified 17 special status species that were documented within five miles. After evaluation of the habitat requirements, range, and distribution, 16 of these species, including one ESA listed species, Sonoran desert tortoise (CCA), have potential to occur in the Project Area. The AZGFD ERT also identified 51 special status species, 3 of which are listed under the ESA. After evaluation of the habitat requirements, range, and distribution of these species, 29 of these species, including 3 ESA listed species (Arizona Toad [UR], Golden Eagle [BGEPA], and yellow-billed cuckoo [Listed Threatened]), have potential to occur in the proposed Project area, the remaining species are not analyzed further.

Project-related effects on these species are described in the Potential Effects section. Copies of the USFWS IPaC and AZGFD ERT reports are included in **Exhibit C-1** and **Exhibit C-2**.

Current Conditions

The proposed Project is within the Arizona Upland/Eastern Sonoran Basins ecoregion (Griffith et al. 2014). Existing land uses around the Project include agricultural, open space, residential, and public and semi-public land. The Project is crossed by numerous ephemeral washes that support cactus, xeroriparian and desert scrub habitat, and are densely vegetated and more diverse. Habitat in the area is expected to be suitable for wildlife species that typically rely on desert and semidesert shrub vegetation communities as well as those that are adapted to disturbed and developed areas. There are no designated Wildlife Movement Areas, important connectivity zones, Important Bird Areas (IBAs), or critical habitat within or around the Project Area

Several ephemeral streams (xeroriparian) contained larger, denser vegetation with more herbaceous vegetation compared to uplands. Xeroriparian habitats provide dense cover in an otherwise open landscape, serving as critical wildlife movement corridors. These features function as "highways," allowing wildlife to travel safely between mountain ranges and isolated habitat patches (Tetra Tech 2026).

Areas of Biological Wealth

No designated or proposed critical habitat occurs within the Project area (USFWS 2026a). No areas of biological wealth (Important Bird Areas [IBAs], critical habitat, or wildlife connectivity areas) occur in the vicinity of the Project (AZGFD 2026a). The Centennial Wash is approximately 0.5 miles southeast of the southeast boundary of the proposed Thermal Plant. The Thermal Plant and Gen-Tie are north of extensive agricultural land uses that occur along the Centennial Wash.

The closest Riparian Areas are the Centennial Wash located approximately 0.5 miles southeast. There are numerous small xeroriparian washes that bisect the Project site. No IBAs occur within the Project Site or vicinity. The closest IBA, the Lower Colorado River Valley IBA, is approximately 55 miles west of the Project.

Potential Effects

Special Status Plants

Implementation of the proposed Project has the potential to cause direct and indirect effects to plants listed under Arizona NPL. The requirements of Arizona NPL will be followed by the Project, to the extent feasible, to minimize the destruction of native plants during construction and operation of the Project. The Applicant is in the process of obtaining a right-of-way (ROW) agreement with Arizona State Land Department (ASLD) for the Energy Center and Gen-Tie, as a portion of the Gen-Tie will cross Arizona State Trust Land managed by ASLD. The proposed Thermal Plant is located entirely on private land and does not require a ROW agreement with ASLD. Accordingly, the Applicant will submit a Native Plant Inventory to ASLD and will adhere to all applicable requirements under State Law. Due to the limited effects associated with the proposed Thermal Plant and Gen-Tie, implementation of the proposed Project is not expected to

result in a measurable change in plant populations for any species nor result in a change in the protective status of any species.

The AZGFD ERT reported two plant species listed under the Arizona NPL, Johnson's fishhook cactus and varied fishhook cactus, which have potential to occur within the Project area. Both are designated as Salvage Restricted and both have potential to occur in the Project area. As discussed above in sections, direct effects to individual salvage restricted plants will be reduced by implementing standard best management practices during site preparation, including avoiding mature individuals where feasible and AZDA notification prior to plant removal when disturbance is unavoidable. Implementation of the proposed Project is not expected to result in a measurable change to the Johnson's fishhook cactus and the varied fishhook cactus population, nor result in a change in the species' management status.

Additional NPL listed plants that have potential to occur within the Project area that were identified during field surveys for the Threatened and Endangered Species Memorandum are included below. As discussed above direct effects to individual salvage restricted, harvest restricted, and salvage assessed plants will be reduced by implementing standard best management practices during site preparation, including avoiding mature individuals where feasible and AZDA notification prior to plant removal when disturbance is unavoidable. Implementation of the proposed Project is not expected to result in a measurable change to the species listed below.

Plants listed under Arizona NPL that were observed during the biological habitat assessment for the Threatened and Endangered Species Memorandum include: Emory's crucifixion thorn (*Castela emoryi*, SR), fishhook barrel cactus (*Ferocactus wislizen*, SR), Graham's nipple cactus (*Mammillaria grahami*, SR), Kunze's cholla (*Grusonia kunzei*, SR), Mexican paloverde (*Parkinsonia aculeata*, SR), ocotillo (*Fouquieria splendens*, SR), pale desert-thorn (*Lycium pallidum*, SR), pink-flower hedgehog cactus (*Echniocereus fendleri*, SR), saguaro (*Carnegiea gigantea*, HS), silver cholla (*Cylindropuntina echinocarpa*, SR), tree cholla (*Cylindropuntia imbricate*, SR), and velvet mesquite (*Neltuma velutina*, SA, HR).

Special Status Wildlife

<u>Amphibians</u>

Arizona Toad

Arizona Toad (AZ SGCN 2) typically inhabits riparian areas such as streams, rivers, and adjacent floodplains in arid and semi-arid regions. It is most often found in sandy or gravelly washes with nearby vegetation like cottonwood and willow, which provide shelter and foraging opportunities. During the breeding season, it relies on shallow, slow-moving or still water along stream margins and backwaters.

Arizona Toad could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Implementation of the proposed Project may cause direct and indirect effects on the Arizona Toad. Vegetation clearing and surface preparing activities would alter or remove suitable amphibian

habitats in the Project area. The loss or alteration of these habitats is not expected to be important to this species based on the availability and suitability of other nearby and unaffected habitats. Implementation of the proposed Project is not expected to result in a measurable change to the Arizona Toad population nor result in a change in the species' management status.

Sonoran Desert Toad

Sonoran Desert Toad (AZ SGCN 2) inhabits desert scrub and semi-arid grasslands, often near washes, springs, or temporary rain pools. It spends much of the year underground and emerges during summer rains to breed in shallow, ephemeral waters.

Sonoran Desert Toad could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Implementation of the proposed Project may cause direct and indirect effects on the Sonoran Desert Toad. Vegetation clearing and surface preparing activities would alter or remove suitable amphibian habitats in the Project area. The loss or alteration of these habitats is not expected to be important to this species based on the availability and suitability of other nearby and unaffected habitats. Implementation of the proposed Project is not expected to result in a measurable change to the Sonoran Desert Toad population nor result in a change in the species' management status.

Birds

Abert's Towhee

Abert's Towhee (AZ SGCN 2) can occur in desert scrub, but usually only where scrub is associated with washes or dense vegetation. It forages on the ground in leaf litter beneath shrubs and requires dense understory cover for nesting and protection. The species is typically found in low-elevation desert areas near reliable water or moist soils that support this vegetation

Abert's towhee could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual Abert's towhee would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Abert's towhee population nor result in a change in the species' management status.

American Kestrel

American kestrel (AZ SGCN 2) may be found in semi-open country with available hunting perches. The species hunts for insects, small rodents, and sometimes other birds.

American kestrels could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual American kestrels would be reduced by following industry standards

aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the American kestrel population nor result in a change in the species' management status.

American Peregrine Falcon

American peregrine falcon (AZ SGCN 1) may be found in open habitat with available cliffs for nesting. The species primarily prey on birds and small mammals. Suitable nesting habitat is not present within the immediate Project area however the species may forage in the Project area.

American peregrine falcons could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual American peregrine falcons would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the American peregrine falcon population nor result in a change in the species' management status.

Bendire's Thrasher

Bendire's thrasher (BCC and AZ SGCN 2) may be found in open desert scrub habitat and arid grasslands. This species often selects spiny cactus species or plants for nesting. There is suitable desert scrub with an abundance of cactus species for nesting within the Project area.

Bendire's thrasher could be directly and indirectly affected by construction activities. Construction-related effects will be temporary and short-term.

Direct effects to individual Bendire's thrashers will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to Bendire's thrasher population nor result in a change in the species' management status.

Brewer's Sparrow

Brewer's sparrows (AZ SGCN 2) may be found during the winter months (nonbreeding season) foraging in open vegetated areas within the Project area. This species is migratory and is unlikely to nest within the Project area.

Brewer's sparrows could be directly and indirectly affected by construction activities if construction is occurring when they may be present. Construction-related effects would be temporary and short-term.

Direct effects to individual Brewer's sparrows would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Brewer's sparrows population nor result in a change in the species' management status.

Bullock's Oriole

Bullock's oriole (AZ SGCN 2) forages and nests in riparian areas, mesquite bosques, and well vegetated washes. This species is a long-distance migrant and winters in Mexico and Central America. There is marginal breeding habitat along the ephemeral washes within the Project area.

Bullock's oriole could be directly and indirectly affected by construction activities. Construction-related effects will be temporary and short-term.

Direct effects to individual Bullock's oriole will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to Bullock's oriole population nor result in a change in the species' management status.

Cactus Wren

Cactus wren (AZ SGCN 2) may be found in areas with abundant cacti, shrubs and other thorny vegetation within the Project area. They typically forage on the ground and in low trees and shrubs. They eat insects, spiders, small reptiles, fruit and seeds, and often nest in cholla species or other spiny cactus species.

Cactus wrens could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual cactus wrens would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the cactus wren population nor result in a change in the species' management status.

Costa's Hummingbird

The Costa's hummingbird (BCC, AZ SGCN 2) may occur in desert scrub and breed in areas with flowering cactus and creosote bush including those within the Project area. This species may also overwinter in areas with flower availability depending on seasonal variation.

Costa's hummingbird could be directly and indirectly affected by construction activities. Construction-related effects will be temporary and short-term.

Direct effects to individual Costa's hummingbirds will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Costa's hummingbird population nor result in a change in the species' management status

Elf Owl

The elf owl (AZ SGCN 3) may occur within desert scrub habitat in the Project area. There are suitable stands of mature cavity-bearing saguaros, and mesquite lined washes within the Project area that could provide suitable nesting substrate for this species. This species does not overwinter in Arizona and migrates down to Mexico during the winter months.

The elf owl could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects will be temporary and short-term.

Direct effects to individual elf owls will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the elf owl population nor result in a change in the species' management status.

Ferruginous Hawk

The ferruginous hawk (Federal Species of Concern and AZ SGCN 2) may occur during winter months for foraging purposes. There is no potential for this species to occur during breeding season as ferruginous hawks are migratory and fly north during the breeding season.

Ferruginous hawks could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects would be temporary and short-term.

Direct effects to individual ferruginous hawks would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the ferruginous hawk population nor result in a change in the species' management status.

Gila Woodpecker

Gila woodpecker (BCC, AZ SGCN 2) may be found in arroyos and riparian woodlands and may forage in adjacent habitats such as those in the Project area. Gila woodpeckers nest in saguaro cacti and within mature riparian woodlands such as within large cottonwoods and willows. Riparian habitat and Saguaro within the Project area may provide nesting habitat and foraging habitat.

Gila woodpeckers could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual Gila woodpeckers would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Gila woodpecker population nor result in a change in the species' management status.

Gilded Flicker

Gilded flicker (AZ SGCN 2) may be found in desert scrub habitats including those within the

Project area. They have potential to nest and overwinter in the Project area. They will often nest in mature saguaros, and occasionally in mesquite and paloverde trees.

Gilded flicker could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects will be temporary and short-term.

Direct effects to individual gilded flickers will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the gilded flicker population nor result in a change in the species' management status.

Golden Eagle

Golden eagle (AZ SGCN 2, BGEPA) occupies a wide range of open and semi-open habitats, including desert scrub, rocky foothills, and mountainous terrain. It typically nests on cliffs or steep rocky outcrops and forages over large expanses of open landscape, including valleys, bajadas, and desert plains. It can readily occur over desert scrub and xeroriparian systems, using these habitats for hunting, particularly where prey such as small mammals are abundant. There is not suitable nesting habitat within the Project area and occurrence would likely be from foraging/hunting individuals.

Golden eagle could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects will be temporary and short-term.

Due to the absence of suitable nesting habitat there is no potential for effects to nesting golden eagles. Direct effects to individual Golden eagles will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012).Implementation of the proposed Project is not expected to result in a measurable change to the Golden eagle population nor result in a change in the species' management status.

Hooded Oriole

Hooded Oriole (AZ SGCN 2) is most commonly associated with riparian corridors, desert washes, and areas with tall trees such as cottonwood, willow, mesquite, and especially palm plantings in developed areas. It favors habitats with vertical structure for nesting, often weaving its hanging nests in palm fronds or high branches.

Hooded Oriole could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects will be temporary and short-term.

Direct effects to individual Hooded orioles will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Hooded oriole population nor result in a change in the species' management status.

Lawerence's Goldfinch

Lawerence's goldfinch (BCC, SGCN 2) occurs irregularly and is often associated with desert scrub, open woodlands, and washes that support seed-producing plants, particularly during favorable precipitation years. It nests in shrubs or small trees and forages on seeds of annual forbs and grasses, often near water sources.

Lawerence's goldfinch could be directly and indirectly affected by construction activities if they are present at the time of construction. Construction-related effects will be temporary and short-term.

Direct effects to individual Lawerence's goldfinch will be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Lawerence's goldfinch population nor result in a change in the species' management status

Le Conte's Thrasher

Le Conte's thrasher prefers sparsely vegetated desert flats, sandy washes, alluvial fans, and gently rolling terrains where low shrubs such as saltbush, creosote bush, and scattered cholla provide both foraging substrate and nest sites. The desert scrub habitat within the Project area is suitable for this species.

Le Conte's thrashers could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual Le Conte's thrasher would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Le Conte's thrasher population nor result in a change in the species' management status.

Lincoln's Sparrow

Lincoln's sparrows (AZ SGCN 2) may be found during the winter months (nonbreeding season) foraging in open vegetated areas within the Project area. This species is migratory and is unlikely to nest within the Project area.

Lincoln's sparrows could be directly and indirectly affected by construction activities if construction is occurring when they may be present. Construction-related effects would be temporary and short-term.

Direct effects to individual Lincoln's sparrows would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the Lincoln's sparrow population nor result in a change in the species' management status.

Loggerhead Shrike

Loggerhead shrike (AZ SGCN 2) may be found in open habitat with short vegetation and well-spaced shrubs, particularly those with spines or thorns within the Project area. They eat insects and other arthropods, amphibians, reptiles, small mammals, and birds.

Loggerhead shrikes could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual loggerhead shrikes would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the loggerhead shrike population nor result in a change in the species' management status.

Northern Harrier

Northern harrier (AZ SGCN 2) was not included in the USFWS IPaC or AZGFD ERT species lists, however this species was observed in the vicinity of the project area during the biological habitat assessment performed by Tetra Tech biologists in December of 2025.

Loggerhead shrikes could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual loggerhead shrikes would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the loggerhead shrike population nor result in a change in the species' management status.

Prairie Falcon

Prairie falcon (AZ SGCN 2) may be found in open habitat with available bluffs or cliffs for nesting. Suitable nesting habitat is not present in or near the Project area, however, this species may forage in the Project area. This species primarily preys on small mammals, particularly ground squirrels but may eat other mammals, birds, and insects.

Prairie falcons could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual prairie falcons would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the prairie falcon population nor result in a change in the species' management status.

Sagebrush Sparrow

Sagebrush sparrow (AZ SGCN 3) may be found in desert grasslands, chaparral and scrub habitats

in the Project area. During the winter months (nonbreeding season) forge in open vegetated areas within the Project area. This species is migratory and is unlikely to nest within the Project area.

Sagebrush sparrows could be directly and indirectly affected by construction activities if construction is occurring when they are present. Construction-related effects would be temporary and short-term.

Direct effects to individual sagebrush sparrows would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the sagebrush sparrow population nor result in a change in the species' management status.

Savannah Sparrow

Savannah sparrow (AZ SGCN 2) may be found during the winter months (nonbreeding season) foraging in open vegetated areas within the Project area. This species is migratory and is unlikely to nest within the Project area.

Savannah sparrows could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual savannah sparrows would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the savannah sparrows population nor result in a change in the species' management status.

Verdin

Verdin (AZ SGCN 2) may be found in areas with abundant desert scrub and areas with thorny vegetation within the Project area. Verdin eat insects and spiders but also consume nectar, fruit, and plant matter. Nests are usually set in a shrub less than 6 feet off the ground.

Verdin could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual verdins would be reduced by following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the verdin population nor result in a change in the species' management status.

Western Burrowing Owl

Western burrowing owl (AZ SGCN 2) is a year-round resident in most of Arizona. These birds typically nest in abandoned small mammal burrows, but have been known to use man-made holes, crevices, and culverts. Burrowing owls are known to occupy suitable desert scrub, semidesert grassland habitats, and agricultural areas especially those with irrigation canals. The proposed

Project area is within the species known range in the state (AZGFD, 2001) and has potentially suitable desert scrub habitat in the open creosote scrub areas. There are suitable small mammal burrows present within the Project area; and this species was observed by Tetra Tech biologists during the biological field visit in December 2025.

Implementation of the proposed Project may cause direct and indirect effects on the western burrowing owl. Temporary increases in construction activities and human presence have the potential to disturb owls, resulting in temporary displacement to other suitable habitats. Indirect effects associated with the conversion of potentially suitable foraging habitats are expected to have minor effects to local birds based on the availability of other nearby, suitable, and unaffected habitats.

Direct effects to individual owls will be reduced by completing pre-construction nest burrow searches in areas proposed for construction during nesting season. If searches identify suitable nesting burrows or other signs of owl presence, completion of a subsequent burrowing owl surveys will determine the necessity for additional mitigation measures to reduce effects to the burrowing owl. The proposed Project will be constructed following industry standards aimed at reducing avian collisions and electrocutions (APLIC 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the burrowing owl population nor result in a change in the species' management status.

Yellow-Billed Cuckoo

Yellow-billed cuckoo (LT, AZ SGCN 1) will migrate south in early fall and will return late spring. Generally, habitat consists of dense leafy groves, thickets along streams, fields, meadows, shrublands, arroyos, abandoned farmland, and canyons. This species is known forage in agricultural habitat adjacent to suitable riparian corridors, the Project site does not support any active agricultural land and does not support densely forested riparian habitat suitable for nesting. There is marginal riparian habitat along the Centennial Wash that supports active and abandoned agricultural land within its floodplain. While unlikely there is potential for this species to occur; However, any occurrence would likely be from an individual passing through or from a stopover site.

Implementation of the proposed Project may cause direct and indirect effects on the yellow-billed cuckoo. Temporary increases in construction activities and human presence have the potential to disturb yellow billed cuckoo, resulting in temporary displacement to other suitable habitats. Indirect effects associated with the conversion of potentially suitable foraging habitats are expected to have minor effects to local birds based on the availability of other nearby, suitable, and unaffected habitats.

Direct effects to individual, yellow-billed cuckoo will be reduced by completing pre-construction sweeps for sensitive wildlife. The proposed Project will be constructed following industry standards aimed at reducing avian collisions and electrocutions (APLIC 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to the yellow-billed cuckoo population nor result in a change in the species' management status.

Non-Listed Bird Species

This section addresses potential Project-related effects to general BCC, SGCN species and other migratory bird species (species not listed as special status above) with the potential to occur in habitats in the proposed Project area. Implementation of the proposed Project may cause direct and indirect effects on BCC, as well as other common migratory bird species. Temporary increases in construction activities and human presence have the potential to disturb individual birds, resulting in temporary displacement to other suitable habitats. Indirect effects associated with the conversion of potentially suitable nesting and foraging habitats are expected to have minor effects to local birds based on the availability of other nearby, suitable, and unaffected habitats. Direct effects to nests would be avoided by completing surface-disturbing activities outside of the nesting period or reduced by completing pre-construction nest surveys during nesting season. Identified nests would be avoided during the nesting season. The proposed Project would be constructed following industry standards aimed at reducing avian collisions and electrocutions (APLIC, 2024; 2012). Implementation of the proposed Project is not expected to result in a measurable change to populations nor result in a change in these species' management status for additional BCC that were analyzed or other migratory bird species.

Invertebrates

Monarch Butterfly

Monarch butterfly (USFWS Proposed Threatened) may be found during the spring and summer months foraging or breeding in desert scrub habitat within the Project area. The species requires milkweed (*Asclepias* spp.) as its host plant for breeding but may forage on other flowering plants.

Monarch butterfly (various life stages) could be directly and indirectly affected by construction activities if construction is occurring when they may be present. Construction-related effects will be temporary and short-term and may include temporary displacement of monarchs from the construction area.

The Project area does not have an abundance of milkweed species to be considered suitable habitat for egg deposition. Occurrence onsite would likely be in the form of an individual passing through, and effects to this species are expected to be negligible. Implementation of the proposed Project is not expected to result in a measurable change to the monarch butterfly population nor result in a change in the species' management status.

Mammals

Arizona Pocket Mouse

Arizona Pocket Mouse (AZ SGCN 2) is a small burrowing mammal that is associated with solid, stable, fine textured soils within desert scrub and bunch grass habitat. Burrows are often present at the base of vegetation. The Project area supports potentially suitable habitat for this species.

Arizona Pocket Mouse could be directly and indirectly affected by construction activities. Individuals unable to escape from a burrow may be killed or injured by construction equipment.

Construction-related effects will be temporary and short-term. Such displacement and effects are expected to have no measurable effects on individual Arizona Pocket Mouse, based on the short-term nature of the proposed activities and the availability of otherwise suitable and unaffected habitats in the vicinity. Implementation of the proposed Project is not expected to result in a measurable change to the Arizona Pocket Mouse population nor result in a change in the species' management status.

Bailey's Pocket Mouse

Bailey's pocket mouse (AZ SGCN 2) is a small burrowing mammal that is associated with open habitats such as rocky slopes, desert scrub and areas with boulders and rocks. Burrows are often present at the base of large bushes and trees.

Bailey's pocket mouse could be directly and indirectly affected by construction activities. Individuals unable to escape from a burrow may be killed or injured by construction equipment. Construction-related effects will be temporary and short-term. Such displacement and effects are expected to have no measurable effects on individual Bailey's pocket mice, based on the short-term nature of the proposed activities and the availability of otherwise suitable and unaffected habitats in the vicinity. Implementation of the proposed Project is not expected to result in a measurable change to the Bailey's pocket mouse population nor result in a change in the species' management status.

Big Free-tailed Bat

Big Free-tailed Bat (AZ SGCN 2) primarily occurs in rugged, rocky landscapes where it roosts in cliff faces, rock fissures, and deep crevices. It is a migratory species that moves seasonally between Mexico and the southwestern United States. Although it is most strongly associated with rocky terrain, it can occasionally use alternative roost sites such as buildings and, less commonly, trees or desert shrubs.

Big Free-tailed Bats could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual Big free-tailed bats would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local Big free-tailed bat population or affect the species' overall management status.

Brazilian Free-tailed Bat

Brazilian free-tailed bat (AZ SGCN 2) is an insectivorous species widespread in the southwestern U.S., including Arizona deserts. It roosts in caves, rocky crevices, and man-made structures such as bridges and buildings, and forages over open desert scrub and grasslands where flying insects are abundant.

Brazilian free-tailed bat could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual Brazilian free tailed bats would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local Brazilian free tailed bat population or affect the species' overall management status.

California Leaf-nosed Bat

The California leaf nosed bat (AZ SGCN 2) is a non-migratory, insectivorous bat found in the Sonoran and Mojave Desert scrub of southern Arizona, southern California, and southern Nevada. It roosts by day in caves, abandoned mine tunnels, rocky crevices, and other sheltered structures and forages at night over desert scrub. Suitable desert scrub foraging habitat occurs within the Project area.

California leaf nosed bat could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term.

Direct effects to individual California leaf nosed bats would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local California leaf nosed bat population or affect the species' overall management status.

Cave Myotis

The cave myotis (AZ SGCN 2) is a medium sized, insectivorous bat found in arid and semi arid regions of the southwestern United States, including southern Arizona. It roosts in caves, abandoned mines, and rocky crevices during the day and forages at night over open desert scrub and riparian areas for flying insects. Suitable foraging habitat occurs within the Project area

Cave myotis could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term

Direct effects to individual cave myotis would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local cave myotis population or affect the species' overall management status.

Desert Red Bat

Desert Red Bat (AZ SGCN 2) is a small, migratory, insectivorous bat found in the southwestern United States. It typically roosts in the foliage of trees and dense shrubs, especially in riparian corridors, desert washes with woody vegetation, and other areas that provide overhead cover. It

forages at night over open desert scrub and along drainages where flying insects are abundant, often using both natural and anthropogenic open-space edges for hunting.

Desert Red Bat could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term

Direct effects to individual desert red bat would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local desert red bat population or affect the species' overall management status.

Greater Western Bonneted Bat
Greater western bonneted bat (AZ SGCN 2) occupies Sonoran desertscrub habitat. This species roosts in mines, caves and rock cervices. It forages at night in open airspace above desert scrub, washes, and other open landscapes, feeding on flying insects well above the ground surface.

Greater western bonneted bat could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term

Direct effects to individual greater western bonneted bat would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local greater western bonneted bat population or affect the species' overall management status

Harris' Antelope Squirrel

Harris' antelope squirrel (AZ SGCN 2) is a small burrowing mammal that is associated with open cacti and desert shrubs with gravel and sandy soils. Burrows are often present at the base of a plant. The Project area supports potentially suitable habitat for this species.

Harris' antelope squirrel could be directly and indirectly affected by construction activities. Individuals unable to escape from a burrow may be killed or injured by construction equipment. Construction-related effects will be temporary and short-term. Such displacement and effects are expected to have no measurable effects on individual Harris' antelope squirrel, based on the short-term nature of the proposed activities and the availability of otherwise suitable and unaffected habitats in the vicinity. Implementation of the proposed Project is not expected to result in a measurable change to the Harris' antelope squirrel population nor result in a change in the species' management status.

Pale Townsend's Big-eared Bat

Pale Townsend's big-eared bat (AZ SGCN 1) a medium-sized, insectivorous bat found. It is strongly associated with cool, dark roosting environments such as caves, abandoned mines, and occasionally large, undisturbed buildings where stable microclimatic conditions are present. It forages at night in cluttered habitats, often along riparian corridors, desert washes, and near

vegetation where moths and other nocturnal insects are abundant.

Pale Townsend's big-eared bat could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term

Direct effects to individual pale Townsend's big-eared bat would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local pale Townsend's big-eared bat population or affect the species' overall management status

Yuma Myotis

Yuma myotis (AZ SGCN 2) is found in a wide variety of upland and lowland habitats, including riparian, desert scrub, moist woodlands, and forests, usually near open water. Foraging occurs over water or in open spaces over land. Warm-season roosts are in caves, cliff crevices, bridges, buildings, and tunnels.

Yuma myotis could be directly and indirectly affected by construction activities. Construction-related effects would be temporary and short-term

Direct effects to individual Yuma myotis would be minimized by adhering to industry standards designed to reduce impacts to nocturnal wildlife, including restrictions on nighttime lighting and construction hours. Implementation of the proposed Project is not expected to cause measurable changes to the local Yuma myotis population or affect the species' overall management status

Reptiles

Gila Monster

Gila monster (AZ SGCN 1) may occur in a variety of desert habitats including creosote bush flats, rocky foothill slopes, palo verde and mesquite lines washes, and desert scrub with stands of cacti. This species resides in burrows or rock cervices to avoid extreme temperatures. They are primarily active during spring and early summer and are opportunistic hunters that will prey on small mammals, eggs, nestlings, insects and small vertebrates. There is suitable habitat within the Project area.

Implementation of the proposed Project may cause direct and indirect effects on the Gila monster. Vegetation clearing and surface preparing activities will alter or remove suitable Gila monster habitats in the Project area. The loss or alteration of these habitats is not expected to be important to this species based on the availability and suitability of other nearby and unaffected habitats. Implementation of the proposed Project is not expected to result in a measurable change to the Gila monster population nor result in a change in the species' management status

Regal Horned Lizard

Regal horned lizard (AZ SGCN 2) is a medium-sized, flat-bodied lizard distinguished by its spiny body and prominent horns at the back of the head. It occurs in arid and semi-arid regions, primarily within desert scrub habitats with loose, sandy or gravelly soils and scattered vegetation. This species is often found in areas with creosote bush, cacti, and mesquite or paloverde, such as those present in the Project area.

Implementation of the proposed Project may cause direct and indirect effects on the regal horned lizard. Vegetation clearing and surface preparation activities will alter or remove suitable lizard habitats in the Project area. The loss or alteration of these habitats is not expected to be important to this species based on the availability and suitability of other nearby and unaffected habitats. Implementation of the proposed Project is not expected to result in a measurable change to the regal horned lizard population nor result in a change in the species' management status.

Sonoran Coralsnake

The Sonoran coralsnake (AZ SGCN 2) is a slender small snake that is brightly colored with broad alternating bands of red and black separated by narrower bands of bright white or yellow. It occupies semiarid regions in a variety of habitat types including desert scrub such as those in the Project area.

Implementation of the proposed Project may cause direct and indirect effects on the Sonoran coralsnake. Vegetation clearing and surface preparing activities will alter or remove suitable snake habitats in the Project area. The loss or alteration of these habitats is not expected to be important to this species based on the availability and suitability of other nearby and unaffected habitats. Implementation of the proposed Project is not expected to result in a measurable change to the Sonoran coralsnake population nor result in a change in the species' management status.

Sonoran Desert Tortoise

The Sonoran desert tortoise (CCA and AZ SGCN 1) is a herbivorous reptile native to the Sonoran Desert. It inhabits a variety of arid habitats, including desert scrub, mesquite and paloverde washes, rocky foothills, and areas with scattered cacti such as saguaro and cholla. There is potentially suitable desert scrub habitat within the Project area. This tortoise spends much of its time in burrows or under vegetation to avoid extreme heat and emerges primarily during the cooler morning and evening hours to forage on grasses, wildflowers, and succulents. Suitable desert tortoise burrows were observed during the biological habitat assessment in December 2025 (Tetra Tech 2026).

Implementation of the proposed Project may cause direct and indirect effects on the Sonoran desert tortoise. Vegetation clearing and surface preparation activities will alter or remove suitable tortoise habitats in the Project area. The loss or alteration of these habitats is not expected to be significant for this species due to the availability of similar habitat in adjacent areas. Implementation of the proposed Project is not expected to result in a measurable change to the Sonoran desert tortoise population nor affect the species' management status.

Direct effects to individual Sonoran desert tortoises will be minimized by conducting pre-construction clearance surveys within all areas proposed for ground disturbance. If tortoises or active burrows are identified, qualified biologists will implement avoidance and/or translocation measures in accordance with AZFGD protocols, including establishment of no-disturbance buffers where feasible. Construction activities will follow best management practices to prevent injury or mortality, including environmental awareness training for personnel, daily monitoring of open trenches with installation of wildlife escape ramps, and use of designated access routes. Upon completion of the project, trenches, pits and other potential entrapment features will be filled in, covered or modified so they are no longer a hazard to desert tortoise. A worker Environmental Awareness Program (WEAP) will be developed and provided to all construction and operations staff detailing desert tortoise life history, potential for occurrence and methods for avoiding tortoise mortality. Additionally, a 15-miles per hour (mph) speed limit will be implemented along the Project ROW to mitigate any potential impacts to this species. Implementation of the proposed Project is not expected to result in a measurable change to the Sonoran desert tortoise population or affect the species' current management status.

Southwestern Speckled Rattlesnake

Southwestern speckled rattlesnake (AZ SGCN 2) is a small to medium-sized venomous snake associated with the rugged and rocky terrain of the mountains of the Mojave and Sonoran deserts. The primary habitat are the rocky lower slopes and canyons, but it is also found in seeps, springs, as well as riparian habitats when available.

Implementation of the proposed Project may cause direct and indirect effects on the southwestern speckled rattlesnake. Vegetation clearing and surface preparation activities will alter or remove suitable snake habitats in the Project area. The loss or alteration of these habitats is not expected to be significant for this species given the presence of suitable habitat nearby. Implementation of the proposed Project is not expected to result in a measurable change to the southwestern speckled rattlesnake population nor affect the species' management status.

Table C-1. USFWS IPaC- Species			
Species		**USFWS Protection Status**	**Potential to Occur in Project Area (Justification)**
Common name	**Scientific name**		
Gila Topminnow (inc. Yaqui)	*Poeciliopsis occidentalis*	Endangered	No potential to occur; no suitable habitat within Project area.
Monarch butterfly	*Danaus plexippus*	Candidate	Flowering plants and suitable habitat for milkweed species are present within the Project Area. Moderate potential to occur.
Southwestern willow flycatcher	*Empidonax traillii extimus*	Endangered	No suitable breeding habitat within the project area. Very low potential to pass through. Marginal foraging habitat could provide a stopover site on the way to suitable riparian breeding habitat.
Yellow-billed cuckoo	*Coccyzus americanus*	Threatened	No suitable riparian forested habitat is present for breeding. There is marginal non-breeding desert scrub and xero riparian corridors. There is low potential for this species to occur and occurrence would likely be from individuals during a stopover.

Table C-2. AZGFD ERT Special Status Species				
Species		**Protection Status[1]**		
Common name	**Scientific name**	**ESA[2, 3]**	**Arizona SGCN[3]**	**Potential to Occur in Project Area (Justification)[4]**
Amphibians				
Arizona Toad	*Anaxyrus microscaphus*		2	Low
Lowland Leopard Frog	*Rana yavapaiensis*		1	No (Habitat)
Sonoran Desert Toad	*Incilius alvarius*		2	Low (Marginal habitat present)
Birds				
Abert's Towhee	*Melozone aberti*		2	Low (Marginal non-breeding habitat present)
American Kestrel	*Falco sparverius*		2	High (Habitat)

Table C-2. AZGFD ERT Special Status Species				
Species		**Protection Status[1]**		
Common name	**Scientific name**	**ESA[2, 3]**	**Arizona SGCN[3]**	**Potential to Occur in Project Area (Justification)[4]**
American Peregrine Falcon	*Falco peregrinus anatum*	S	2	Moderate (Suitable non-breeding habitat present)
Bendire's Thrasher	*Toxostoma bendirei*		2	High (Habitat)
Brewer's Sparrow	*Spizella breweri*		2	Low (Non-breeding habitat present)
Bullock's Oriole	*Icterus bullockii*		2	High (Habitat)
Cactus Wren	*Campylorhynchus brunneicapillus*		2	High (Habitat)
Chestnut-collared Longspur	*Calcarius ornatus*		2	No (Habitat)
Costa's Hummingbird	*Calypte costae*		2	High (Habitat present)
Elf owl	*Micrathene whitneyi*		3	Moderate (Breeding habitat present)
Ferruginous Hawk	*Buteo regalis*		2	Moderate (Winter foraging habitat present)
Gila Woodpecker	*Melanerpes uropygialis*		2	High (Habitat present)
Gilded Flicker	*Colaptes chrysoides*		2	High (Habitat present)
Golden Eagle	*Aquila chrysaetos*	BGEPA	1	Moderate (Non-breeding habitat present)
Gray Flycatcher	*Empidonax wrightii*		2	No (Habitat)
Hooded Oriole	*Icterus cucullatus*		2	Moderate (Marginal breeding habitat present)
LeConte's Thrasher	*Toxostoma lecontei*		2	High (Habitat)
Lincoln's Sparrow	*Melospiza lincolnii*		2	low (Non-breeding habitat present)
Loggerhead Shrike	*Lanius ludovicianus*		2	High (Habitat present)
Long-eared Owl	*Asio otus*		2	None (Habitat)
Mountain Plover	*Anarhynchus montanus*		2	None (Habitat)
Northern Harrier (Included in this table due to observation in the field)	*Circus hudsonius*		2	High (Observed in the vicinity of the Project area during habitat assessment surveys)

Table C-2. AZGFD ERT Special Status Species				
Species		**Protection Status[1]**		
Common name	**Scientific name**	**ESA[2, 3]**	**Arizona SGCN[3]**	**Potential to Occur in Project Area (Justification)[4]**
Prairie Falcon	*Falco mexicanus*		2	Moderate (Non-breeding habitat present)
Sagebrush Sparrow	*Artemisiospiza nevadensis*		3	Low (Marginal winter foraging habitat present)
Sprague's Pipit	*Anthus spragueii*		2	None (Habitat)
Swainson's Thrush	*Catharus ustulatus*		2	None (Habitat)
Verdin	*Auriparus flaviceps*		2	High (Habitat)
Vesper Sparrow	*Pooecetes gramineus*		2	None (Habitat)
Western Burrowing Owl	*Athene cunicularia hypugaea*		2	High (Breeding and non-breeding habitat present)
Western Screech-owl	*Megascops kennicottii*		2	High (Suitable breeding habitat present)
Yellow-billed Cuckoo (Western DPS)	*Coccyzus americanus*	LT	1	Low (Marginal non-breeding habitat present)
Mammals				
Arizona Pocket Mouse	*Perognathus amplus*		2	Moderate (Suitable habitat and soils for burrowing)
Bailey's Pocket Mouse	*Chaetodipus baileyi*		2	Moderate (Suitable habitat and soils for burrowing)
Big Free-tailed Bat	*Nyctinomops macrotis*		2	Low (Marginal foraging habitat, low potential for roosting)
Brazilian Free-tailed Bat	*Tadarida brasiliensis*		2	Moderate (Foraging only)
California Leaf-nosed Bat	*Macrotus californicus*		2	Moderate (Foraging only)
Cave Myotis	*Myotis velifer*		2	Moderate (Foraging only)
Desert Red Bat	*Lasiurus frantzii*		2	Low (Marginal foraging and roosting habitat present)
Greater Western Bonneted Bat	*Eumops perotis californicus*		2	Moderate (Foraging only)
Harris' Antelope	*Ammospermophilus*		2	Moderate (Suitable

Table C-2. AZGFD ERT Special Status Species				
Species		**Protection Status[1]**		
Common name	**Scientific name**	**ESA[2, 3]**	**Arizona SGCN[3]**	**Potential to Occur in Project Area (Justification)[4]**
Squirrel	*harrisii*			habitat and soils for burrowing)
Hoary Bat	*Lasiurus cinereus*		2	None (Habitat)
Pale Townsend's Big-eared Bat	*Corynorhinus townsendii pallescens*		1	Moderate Foraging only
Pocketed Free-tailed Bat	*Nyctinomops femorosaccus*		2	None (habitat)
Western Yellow Bat	*Lasiurus xanthinus*		2	None (habitat)
Yuma Myotis	*Myotis yumanensis*		2	Moderate (Foraging only)
Plants	**Scientific Name**	**ESA***	**NPL**	**Potential to Occur in Project Area (Justification)[4]**
Johnson's Fishhook Cactus	*Echinomastus johnsonii*		SR	Yes (Suitable habitat present)
Varied Fishhook Cactus	*Mammillaria viridiflora*		SR	Yes (Suitable habitat present)
Reptiles				
Gila Monster	*Heloderma suspectum*	--	1	Moderate (habitat)
Regal Horned Lizard	*Phrynosoma solare*	--	2	Moderate (habitat)
Sonoran Coralsnake	*Micruroides euryxanthus*	--	2	Moderate (habitat)
Sonoran Desert Tortoise	*Gopherus morafkai*	CCA	1	Low (Marginal habitat)
Southwest Speckled Rattlesnake	*Crotalus pyrrhus*		2	Moderate (habitat)

[1] LE=Endangered, LT=Listed Threatened, C=Candidate, EP, XN=Experimental Population, Non-Essential, SC=Species of Concern, BCC=Bird of Conservation Concern, BGEPA=Bald and Golden Eagle Protection Act protected, WSC=Wildlife Species of Concern, CCA=Candidate Conservation Agreement, SR=Salvage Restricted, HS=Highly Safeguarded
[2] USFWS, 2025
[3] AGFD, 2025a, b, 2022
[4] Habitat means the Project is within the species elevation requirements but there is no suitable or potential habitat for the species. References are provided in the References Section.

Mitigation Measures

The Project is not likely to significantly affect any rare, endangered, or other special status species. To the extent feasible, implementation of mitigation measures listed in **Table C-3** will ensure avoidance and minimization of potential risk to wildlife, and the risk that electrical infrastructure poses to birds will be addressed by following industry suggested practices as design features for the Project. These mitigation measures were developed by including the feasible measures

provided in the AZFGD letter dated April 23, 2026. The Applicant shall continue to work with AZGFD regarding the proposed measures below and will prepare a response letter to any measures that are deemed infeasible due to engineering constraints or other considerations.

Table C-3 Proposed Measures
BIOLOGICAL RESOURCES
Vegetation
Adverse effects on vegetation during construction would be minimized as follows:
• The Project will comply with Arizona Native Plant Law regulations. A Native Plant Inventory will be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under the Arizona Native Plant Law. • Operation of all vehicles and equipment will be kept to designated access roads and work areas.
The following prescriptions would prevent the spread of invasive weeds into previously uninfested areas in the designated construction ROW.
• To minimize the potential introduction or spread of exotic invasive species, the Project will take precautions to wash and/or decontaminate equipment before entering and leaving the site. • All equipment brought on to the Project will be inspected and confirmed as free of noxious weeds or other undesirable organic material • Where possible, the Project will revegetate disturbed areas with native drought-tolerant species that represent the natural surrounding landscape.
Wildlife
Construction activities and vehicle operation would be conducted to minimize potential impacts or disturbance of wildlife.
• Speed limits along the ROW and access roads would be limited to 15 mph. In addition, construction and maintenance employees would exercise caution when traveling to and from the proposed ROW site on designated routes to reduce the potential for wildlife mortality. • During construction, work areas would be checked for animals before daily work is initiated to minimize harm. • If trenching or digging of large holes occurs, the Project will minimize the number of open holes/trenches at any given time. Where trenches/holes cannot be backfilled immediately, escape ramps will be constructed in each hole and at least every 300 feet in trenches. Trenches or holes that have been left open will be inspected for animals and animals removed prior to backfilling.
Design would minimize electrocution and collision potential for birds:
• The Project will be designed and maintained per the Avian Power Line Interaction Committee's (APLIC) current recommended standards.
Design would minimize nighttime disturbance of nocturnal animals:
• Lighting at the Project will be kept to a minimum to avoid impacts to nocturnal or nocturnally migrating wildlife. This will include minimizing the use of high intensity

Table C-3 Proposed Measures
lighting, steady-burning, or bright lights such as sodium vapor, quartz, halogen, or other bright spotlights. Lights will also be hooded downward and directed to minimize horizontal and skyward illumination. Whenever possible, motion-activated or Infrared illumination lights that do not react to animal movement and switches will be used to keep lights off when not required.
Implement conservation measures to decrease the likelihood of take of special status wildlife species and impacts to critical habitat.
• Travel will be limited to existing roads and surface disturbance to previously disturbed areas.
• If construction will occur during the nesting season, a pre-construction migratory bird nest survey will be conducted by a qualified biologist within 30 days prior to the commencement of construction activities to ensure that any active nests are avoided. If an active nest is discovered, on-site personnel will contact the Applicant for steps to take to ensure the nesting birds are protected.
• If construction activities must occur during active seasons for relevant species of concern, qualified biologists will conduct surveys ahead of clearing activities to identify active nests or burrows and implement protective measures as necessary in coordination with the AZGFD.
• If wildlife species are encountered during Project activities, the individual(s) will be evaluated and moved by a qualified biologist no more than a quarter of a mile outside of the Project boundary within similar habitat in accordance with AZGFD recommendations.
• Where feasible fencing will include a 9-inch gap between the ground surface and bottom of the fence after construction is completed, in order to allow for movement of smaller wildlife species. • Grading and vegetation trimming within the Project will be minimized to the greatest extent feasible, using alternative methods such as drive and crush.
Decommission Plan
• A decommissioning plan will be developed to restore natural conditions, using the pre-construction plant diversity and vegetation composition, as well as that of the surrounding natural landscape, as the criteria for successful restoration. • Upon decommissioning all facility components and fencing will be removed from the site to reduce impacts to local wildlife and habitat. If any fencing will remain following decommissioning, the applicant will coordinate with AZGFD to ensure that the remaining fence will not negatively impact wildlife.

References

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U.S. Fish and Wildlife Service (USFWS). 2026. Information for Planning and Consultation (IPaC). Environmental Conservation Online System (ECOS) online environmental review tool. Consultation Code. Available at: https://ecos.fws.gov/ipac/. Accessed April 2026.

EXHIBIT C-1
USFWS IPAC – LISTED SPECIES

IPaC

U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

La Paz County, Arizona

Local office

Arizona Ecological Services Field Office

(602) 242-0210
(602) 242-2513

9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. 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.

The following species are potentially affected by activities in this location:

Birds

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

Fishes

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

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Insects

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

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

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 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).

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 https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- 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

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

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Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate 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.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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.

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

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

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.

Review the FAQs
The FAQs below provide important additional information and resources.

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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 (▪)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

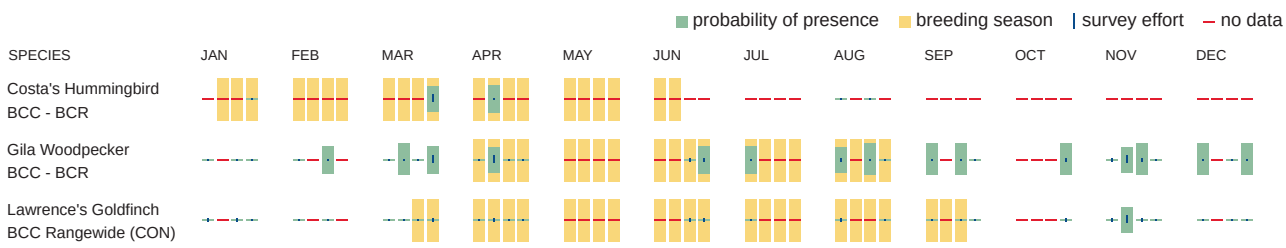
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

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

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the

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probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate 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.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

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 at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

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.

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

NOT FOR CONSULTATION

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

EXHIBIT C-2
AZGFD ONLINE ENVIRONMENTAL REVIEW TOOL RESULTS

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:
Eagle Eye

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

Project ID:
HGIS-28097

Project Description:
NA

Contact Person:
Tristen Utic

Organization:
KP Environmental Inc

On Behalf Of:
PRIVATE

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.

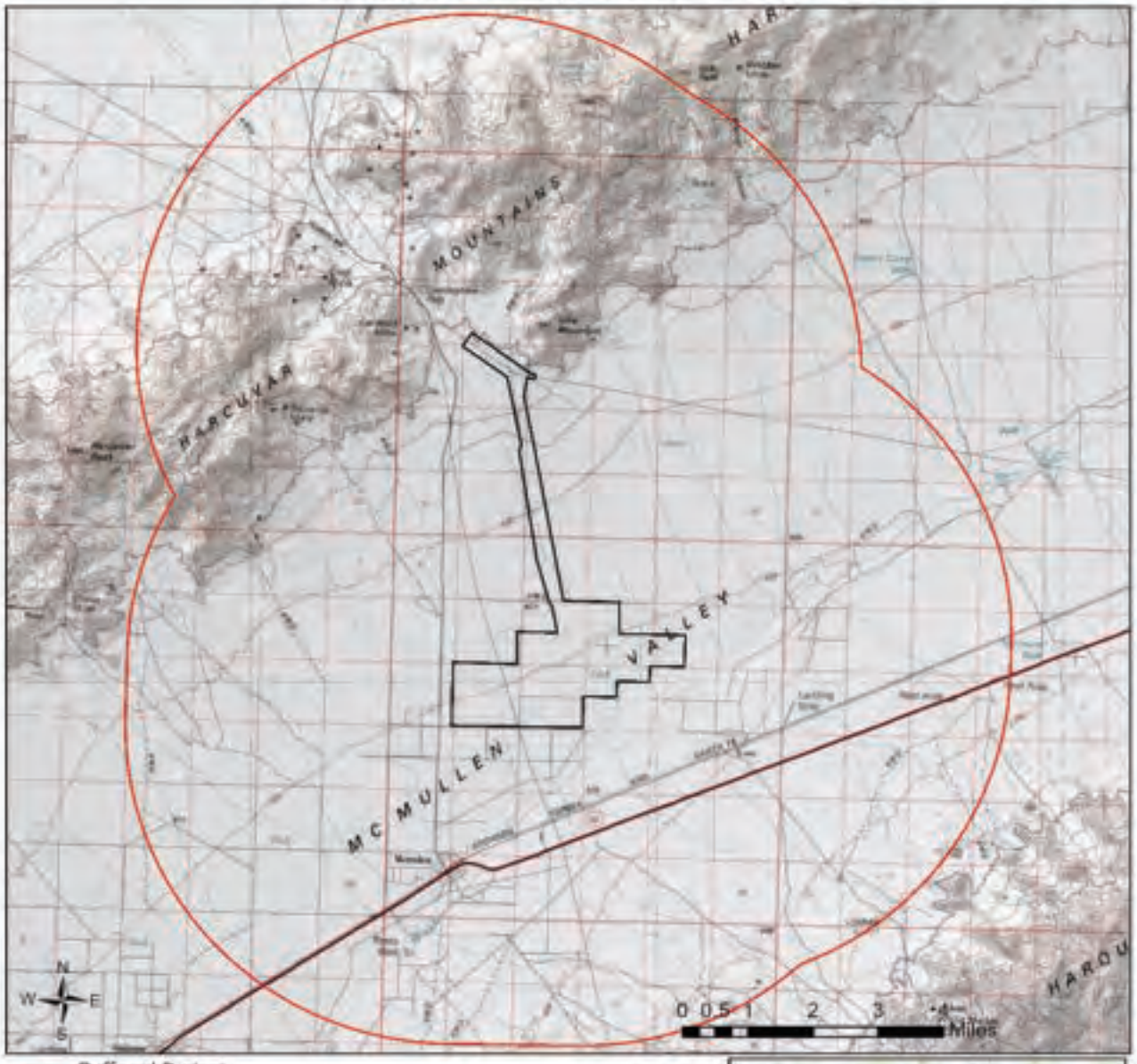
Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

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.

Eagle Eye

USA Topo Basemap With Locator Map



Buffered Project Boundary

Project Boundary

Project Size (acres): 3,377.95

Lat/Long (DD): 33.8704 / -113.5102

County(s): La Paz

AGFD Region(s): Yuma

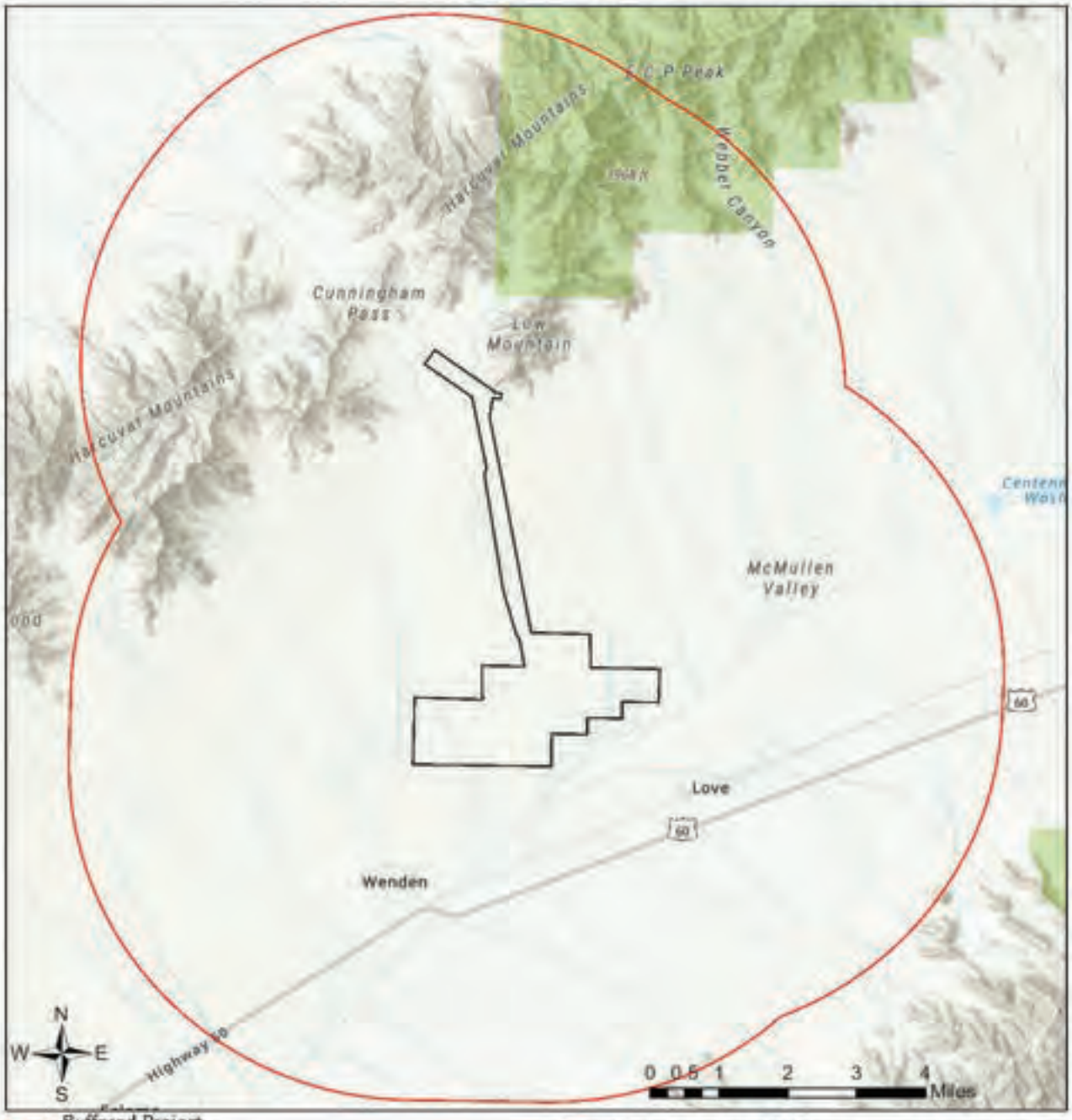
Township/Range(s): T6N, R12W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME +

County of Yavapai, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Copyright © 2013 National Geographic Society, i-cubed
Esri, USGS

Eagle Eye

Important Areas



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

Project Size (acres): 3,377.95

Lat/Long (DD): 33.8704 / -113.5102

County(s): La Paz

AGFD Region(s): Yuma

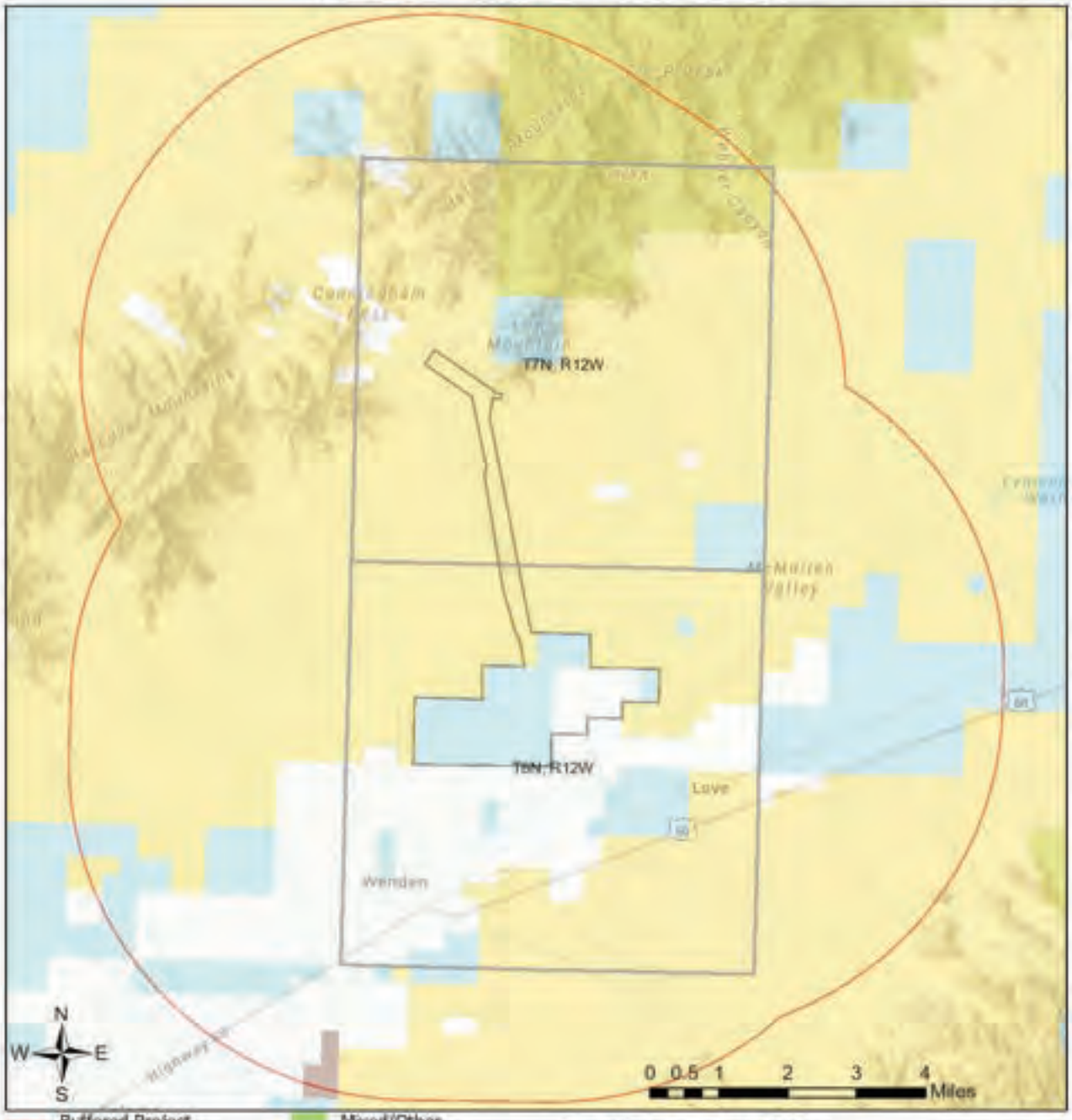
Township/Range(s): T6N, R12W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME

Esri, NASA, NGA, USGS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

Eagle Eye

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): 3,377.95
Lat/Long (DD): 33.8704 / -113.5102
County(s): La Paz
AGFD Region(s): Yuma
Township/Range(s): T6N, R12W; T7N, R12W
USGS Quad(s): CUNNINGHAM PASS; SALOME

Esri, NASA, NGA, USGS
Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

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	BGA		S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					3
Asio otus	Long-eared Owl					2
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Auriparus flaviceps	Verdin					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
Buteo regalis	Ferruginous Hawk			S		2
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 frantzii	Desert Red Bat		S			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

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
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Toxostoma bendirei	Bendire's Thrasher					2
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					
Ovis canadensis mexicana	Mexicana Desert Bighorn Sheep					
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.

EXHIBIT C-3
AZGFD CORRESPONDENCE

April 23, 2026

Ms. Tiffany Wyckoff
La Paz County Community Development
1112 Joshua Ave, Suite 202
Parker, Arizona 85344

Electronically submitted to tiwyckoff@lapaz.gov

RE: La Paz County Case No. CPA2026-01 & CUP2026-03 - Eagle Eye Energy Center

Dear Ms. Wyckoff:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review La Paz County Case No. CPA2026-01 and CUP2026-03 for the proposed Eagle Eye Energy Center (Project). The Department understands that EAGL, LLC, a subsidiary of BNC DEVCO, LLC and joint venture between BrightNight, LLC (BrightNight) and Cordelio Power, has submitted Comprehensive Plan Amendment (CPA) and Conditional Use Permit (CUP) applications to La Paz County proposing to construct a 400 MW photovoltaic (PV) solar facility with a battery energy storage system (BESS), a 600 MW natural gas generation plant, and associated infrastructure on approximately 2,558 acres of private and Arizona State Land Department (ASLD) lands northeast of the town of Wenden in unincorporated La Paz County, Arizona. The facility will be located east of Alamo Road and north of Highway 60 in primarily undeveloped Sonoran desert scrub habitat. An approximately 4.8-mile 230-kV generation intertie (gen-tie) transmission line on Bureau of Land Management (BLM) land would connect the facility to the existing Western Area Power Administration (WAPA) owned Harcuvar Substation. The Department understands that the gen-tie line and data center are not in county jurisdiction and are therefore not included in the CPA or CUP applications. The CPA would change the land use designation from Low Density Residential to Rail/Heavy Industrial, and the Conditional Use Permit is necessary to permit the Project as an allowable use in the current Rural Agriculture zoning district that the Project is located in.

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

GOVERNOR: KATIE HOBBS COMMISSIONERS: CHAIR MARSHA PETRIE SUE, SCOTTSDALE | JEFF BUCHANAN, PATAGONIA | JAMES E. COUGHENOUR, PAYSON
KURT KEHR, PINETOP | JESSICA MANUELL, PARKS DIRECTOR: TOM P. FINLEY DEPUTY DIRECTOR: JOSHUA W. HURST

The Department recognizes the importance of planning efforts to develop renewable energy facilities that contribute to regional and state economic growth needs and would like to work closely with BrightNight, Cordelio Power, KP Environmental, and La Paz County during the planning and development of this facility. The Department recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and recreational access during development and operation of the facilities. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

Arizona has recently seen an increase in the number of proposed and in-development renewable energy generation projects and associated infrastructure. A number of energy projects have been built or proposed within the vicinity of this Project. Although each of these projects individually may have a minimal impact on the broader landscape, these projects cumulatively could result in loss of habitat, impact wildlife movements, and affect wildlife-related recreation. Additionally, long-term effects to wildlife can extend several kilometers beyond the footprint of a solar project area (Sawyer et al. 2025[1]). It is important to consider all potential cumulative effects and to evaluate this Project in association with other projects in the area. Department staff are available to assist in identifying potential cumulative impacts to wildlife and associated voluntary conservation measures that can be implemented for the Project.

The Department recommends conducting surveys in the Project area to determine species presence. These surveys should be of sufficient duration and intensity to adequately assess all habitat types and potential wildlife species occurrence in and adjacent to the Project area. Department staff are available to assist BrightNight and Cordelio Power in determining appropriate surveys to conduct, as well as recommend design features and best management practices that can help minimize potential impacts. Based on the information provided, the Department offers the following recommendations to reduce potential impacts to wildlife and habitat; additional information can be found in *Guidelines for Solar Development in Arizona*[2]. Please note that these guidelines were recently updated.

- The western burrowing owl, a special status species that is regulated under the Migratory Bird Treaty Act (MBTA), has the potential to occur in the Project area. The Department recommends conducting occupancy surveys for this species in advance of the design phase to understand distribution of burrowing owls in the Project site; avoidance of a large burrowing owl population may be advisable over removal or other conservation measures. Guidelines for conducting this survey are found in *Burrowing Owl Project Clearance Guidance for Landowners*[3]. Please note that the survey should be conducted by a surveyor who is certified by the Department or has similar training and qualifications. If an active burrowing owl burrow is detected, please contact the Department for direction, in accordance with the guidelines.

[1] https://besjournals.onlinelibrary.wiley.com/doi/full/10.1002/2688-8319.70071
[2] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/FinalSolarGuidelines03122010.pdf
[3] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/nongame/eagles/BurrowingOwlClearanceProtocol_2009.pdf

- The Sonoran desert tortoise, which is a federal and state species of special concern, has been documented within five miles of the Project area. The Department recommends conducting surveys for Sonoran desert tortoise within suitable habitat to determine the presence of this species. The *Sonoran Desert Tortoise Conservation Guidelines*[4] provide protocols for these surveys. If this species is detected, please refer to this document for guidelines on handling tortoises and recommended measures to avoid, minimize, or offset impacts to this species resulting from development activities.
- The Department also recommends conducting surveys for nesting birds prior to vegetation removal and/or construction activities that occur during the breeding season. The vegetation within the Project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA).
    - The Bendire's thrasher and the LeConte's thrashers are special status species that are also regulated under the MBTA and have been documented within five miles of the Project area. The Department recommends following the Desert Thrashers Working Group (DTWG)'s Clearance Survey Protocol if Project activities occur between March 15th and June 30th; the protocol can be found in the DTWG's Conservation of Bendire's and LeConte's Thrashers at Solar Development Sites[5].
- Burrowing species could occur within the Project area and could be influenced by construction activities and by loss of habitat. Surveys for these species are recommended to determine their presence and to inform pre-construction activities. Department staff are available to assist in identifying suitable conservation measures, such as one-way exclosures on burrows that allow wildlife to exit the burrows and disperse to adjacent lands in advance of construction.

Maintaining habitat connectivity is a priority for the Department, and wildlife movement corridors are important for wildlife to respond to changing environmental conditions. This Project falls within the Harcuvar Mountains-Harquahala Mountains identified wildlife movement area in Maricopa County, and the landscape in which this Project is proposed provides important movement pathways for wildlife utilizing agricultural fields to the south. The Department would like to meet with BrightNight and Cordelio Power to discuss opportunities to incorporate wildlife connectivity into the Project design, including the following:

- The Department noted that the Project design avoids washes and recommends that these washes are left in their natural state without fencing or other barriers to wildlife movement. Additionally, it is recommended that corridor widths are increased where feasible to include upland areas adjacent to the wash. The Department generally recommends a minimum corridor width of approximately 1,300 feet, or as wide a corridor as is feasible for the Project.
- The Department appreciates that fencing will include a nine inch gap between the ground surface and bottom of the fence after construction is completed, in order to allow for movement of smaller wildlife species. The Department's *Wildlife Compatible Fencing*

[4] https://azgfd-portal-wordpress-pantheon.s3.us-west-2.amazonaws.com/wp-content/uploads/2025/01/16114611/Rubke-2024.-Sonoran-Desert-Tortoise-Conservation-Guidelines.pdf
[5] https://borderlandsbirds.org/wp-content/uploads/2024/09/Desert-Thrasher-Solar-Recommendations-1.0.pdf

Guidelines[6] provide information on how fencing impacts wildlife, ways to design fencing to prevent wildlife entanglement and impalement, and additional ways to ensure wildlife movement is not restricted. Department personnel are available to help determine appropriate fencing design and layout that achieves Project objectives while minimizing the impact on wildlife.

- The Department appreciates that grading within the Project will be minimized to the extent feasible, using alternative methods such as drive and crush. The topography in the majority of the site is flat and may require minimal trimming of shrubs and existing vegetation to install the panels. Retaining habitat features underneath the panels, namely existing soil and root structures, can help to minimize erosional run-off and reduce biodiversity loss within the site (Grodsky and Hernandez 2020[7]).

Finally, the Department offers the following general recommendations to reduce potential impacts to wildlife and habitat during construction and operation of the facility:

- A variety of other Arizona Species of Greatest Conservation Need (SGCN) have the potential to occur within the Project area, including the gila monster and Sonoran coral snake. If wildlife are encountered during Project activities, the Department recommends moving them out of harm's way, no more than 0.25 mile outside the Project boundary within similar habitat. Please note that the Department has an interactive website, Arizona Wildlife Conservation Strategy[8], that includes the most recent list of SGCN to help navigate and identify conservation opportunities.
- If trenching or digging of large holes will occur, the Department recommends that trenching/digging and backfilling crews work closely together to minimize the number of open holes/trenches at any given time. Where trenches/holes cannot be backfilled immediately, the Department recommends escape ramps be constructed in each hole and at least every 300 feet in trenches. Escape ramps can be short lateral trenches or wooden planks sloping to the surface, and ramp slopes should be less than 45 degrees (1:1). Trenches or holes that have been left open should be inspected for animals and animals removed prior to backfilling.
- The Department 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 Department's Raptor Coordinator, who can be

[6] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125_AGFD_fencing_guidelines.pdf
[7] https://www.nature.com/articles/s41893-020-0574-x
[8] https://awcs.azgfd.com

contacted at raptors@azgfd.gov or 623-236-7575, can provide further information on specific design features and best management practices.

- Artificial lighting could impair the ability of nocturnal animals to navigate (e.g., owls, migratory birds, bats, and other nocturnal mammals) and may affect wildlife behavior and populations (Davies et. al. 2013[9]). The Department appreciates that Project lighting will be downshielded when lighting is necessary, and recommends using wildlife-friendly "warmer" narrow spectrum lighting (amber, orange, red) where feasible to minimize the number of species affected by lighting.
- The information provided indicates that the Project may include drainage improvements such as culverts along internal access roads and on-site retention as needed. Please refer to *Guidelines for Culvert Construction to Accommodate Fish & Wildlife Movement and Passage*[10], found on the Department's website, and incorporate guidance as appropriate for culvert reconstruction. Department personnel are available to assist in identifying potential impacts to wildlife and conservation measures to minimize potential impacts during development or construction of erosion structures. As an example, rip-rap is difficult for many species to traverse. If rip-rap is required for the construction of on-site retention basins or large-scale drainage needs, burying and back-filling with topsoil or other substrate would allow wildlife to move through the basins.
- Please ensure the Project complies with Arizona Native Plant Law[11] regulations. A Native Plant Inventory may need to be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under the Arizona Native Plant Law.
- To minimize the potential introduction or spread of exotic invasive species, the Department encourages taking precautions to wash and/or decontaminate equipment before entering and leaving the site. See the Arizona Department of Agriculture website[12] for a list of prohibited and restricted noxious weeds and the Arizona Native Plant Society [13] for recommendations on control methods. To view a list of documented invasive species or to report invasive species in or near the project area, visit iMapInvasives[14], which is a national cloud-based application for tracking and managing invasive species.
    - Stinknet is a highly invasive noxious winter weed native to South Africa, and is extremely flammable when dry. Stinknet (also known as globe chamomile) has heavily infested Maricopa, Pinal, and Pima counties and is expanding into Yuma, Yavapai, and Gila counties. Infestations spread rapidly along highways and open fields in residential areas, with emergence starting in late November and plants continuing to germinate and emerge through May in wet years. In order to minimize the spread of this plant it is critical that any new infestations are identified and quickly managed. Additional information is available through the

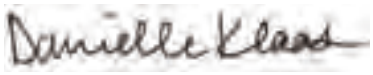
[9] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119
[10] https://www.azgfd.com/wildlife/planning/wildlifeguidelines/
[11] https://agriculture.az.gov/plantsproduce/native-plants
[12] https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds
[13] https://aznps.com/invas
[14] https://imap.natureserve.org/imap/services/page/map.html

Southwest Vegetation Management Association[15], the Sonoran Desert Cooperative Weed Management Area[16], or the Arizona Native Plant Society[17].

- The Department recommends revegetating disturbed areas with native drought-tolerant species that represent the natural surrounding landscape. Native and pollinator friendly seed mixes are beneficial for post construction revegetation efforts, and 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 Department recommends that a decommission plan be developed early in the Project planning process. It is recommended that the plan be made flexible to incorporate any decommissioning technology or research that might be developed during the lifetime of the facility. Decommissioning of a solar facility involves both the removal of the equipment and the restoration of the site to natural conditions (ACP 2021[18]). Although the Department recognizes that complete restoration to natural conditions could be difficult, it is recommended the Project proponents strive to restore natural conditions, using the pre-construction plant diversity and vegetation composition, as well as that of the surrounding natural landscape, as the criteria for successful restoration.
    - It is also recommended that all facility components and fencing be removed from the site to reduce impacts to local wildlife and habitat, helping the reclamation process. If any fencing will remain following decommissioning, it is encouraged that the Project proponent coordinate with the Department to ensure that the remaining fence will not negatively impact wildlife.

The Department appreciates the opportunity to review La Paz County Case No. CPA2026-01 and CUP2026-03 for the Eagle Eye Energy Center, and looks forward to continued coordination with BrightNight and Cordelio Power during the planning and development of this Project. For further coordination, please contact Teigan Williams at tstruck@azgfd.gov or 928-341-4069.

Sincerely,



Danielle Klaas
Regional Supervisor, Region IV

cc: Callie Cavalcant – Habitat, Evaluation, and Lands Branch Chief, AZGFD

AZGFD #M26-03265657

[15] https://www.swvma.org/
[16] https://www.sdcwma.org/species/stinknet.php
[17] http://aznps.com
[18] https://cleanpower.org/wp-content/uploads/2021/12/Final_What-happens-when-a-solar-project-is-decommissioned_Fact-Sheet.pdf

EXHIBIT C-4
THREATENED AND ENDANGERED SPECIES MEMORANDUM FOR THE EAGLE EYE ENERGY CENTER IN LA PAZ COUNTY, ARIZONA

TETRA TECH

Memo

To: BrightNight, LLC

From: Tetra Tech, Inc. - Frank Acosta Rodriguez and Patty Hardesty

Date: February 2, 2026

Subject: Threatened and Endangered Species Memorandum for the Eagle Eye Energy Center in La Paz County, Arizona

1.0 INTRODUCTION

Bright Night, LLC plans to develop the Eagle Eye Energy Center Project (Project) in La Paz County, Arizona. The Project Area consists of 3,280 acres of private and state trust lands administered by the Arizona State Land Department 2.5 miles north of the town of Wenden, Arizona (Figure 1). At the request of Bright Night, LLC, Tetra Tech, Inc. (Tetra Tech) has prepared this Threatened and Endangered Species Memorandum for the Project Area consisting of a desktop review and field visit to document existing habitat and biological resources, including special-status species and raptor nests that may be impacted by Project development. Specifically, this Threatened and Endangered Species Memorandum discusses characterizing the landscape of the Project and evaluates the likelihood of occurrence of special-status species within and near the Project based on available habitat.

2.0 METHODS

2.1 Desktop Assessment

Prior to conducting the field survey, Tetra Tech conducted a desktop analysis to identify existing biological resources that could be affected by development of the Project. Tetra Tech reviewed the following publicly available information:

- Arizona Game and Fish Department (AZGFD) Environmental Review Tool (AZGFD 2026a)
- AZGFD Species Abstracts (AZGFD 2026b)
- eBird online database of bird observations (eBird 2026)
- Google Earth time-series imagery (Google Earth 2026)
- National Land Cover Database (USGS 2021)
- National Hydrography Dataset (USGS 2026)
- National Wetlands Inventory (USFWS 2026a)
- NatureServe Explorer Database (NatureServe 2026)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2026b)
- USFWS Environmental Conservation Online System (USFWS 2026d)

Tetra Tech
1560 Broadway, STE 1400 | Denver, CO 80202
303.825.5999 | tetratech.com

Tetra Tech obtained and used the most current data available at the time of the assessment; however, information may change after the completion of this report. Tetra Tech requested an informal species list from the USFWS through the IPaC to identify federally listed species with the potential to occur within the Project Area and USFWS-designated critical habitat. Tetra Tech also requested an automated Project review through the Arizona Environmental Review Tool to obtain information on potentially occurring state and federally listed species and other biological resources within and near the Project. These resources were used to generate a list of potentially occurring special-status species within the Project Area and determine a likelihood of occurrence for these species based on range maps, aerial imagery, known occurrences, the National Land Cover database, and results of the field visit.

2.2 Field Visit Methods

A Tetra Tech biologist conducted a habitat assessment of the Project Area from December 11 to 18, 2025. The purpose of the field visit was to verify the desktop assessment results, assess and record habitat for special-status species, and record important features, such as nesting habitat. The biologist also recorded wildlife and plant observations and took representative photographs (Attachment A). The field visit was conducted along publicly accessible roads, and the biologist was equipped with a global positioning system-enabled tablet for navigation and data collection, and binoculars and a spotting scope to scan features in the distance.

Habitat is the natural environment in which a particular species or a community of organisms lives and thrives, providing the necessary resources such as food, shelter, water, and suitable climatic conditions. It encompasses both biotic factors, such as vegetation and prey availability, and abiotic factors, such as soil type and temperature. Habitat can be used as an indicator of potentially occurring species because the presence of specific habitat characteristics often correlates strongly with the requirements of certain species. The field-based habitat assessment was used to help identify which species may inhabit the Project.

3.0 RESULTS

3.1 Land Use and Land Cover

According to the U.S. Geological Survey National Land Cover Database, three land cover types are mapped within the Project Area (USGS 2021; Table 1, Figure 2). The two most dominant cover types within the Project Area are Shrub/Scrub at 2,545.48 acres (99.87 percent) of cover and Developed, Open Space at 3.24 acres (0.13 percent). There are no open water features found within the Project Area. The adjacent land use is predominantly agricultural. The Harcuvar Mountain Range lies to the north of the Project Area, while the Harquahala Mountain Range is located to the south.

Table 1. Land Cover in the Project Area

Land Cover Type	Acreage	Percent of Project Area
Shrub/Scrub	3265.97	99.90
Developed, Open Space	3.24	0.09
Cultivated Crops	0.04	0.001
TOTAL	3269.3	100.00

Source: USGS 2021

3.2 Wetlands and Other Waters

Wetlands (swamps, marshes, bogs, and similar areas) and other aquatic habitats play a major role in the survival of many birds, insects, amphibians, reptiles, mammals, and plants. Figure 3 displays the locations of surface waters and wetlands in and near the Project Area, mapped by the National Hydrography Dataset (USGS 2026) and National Wetlands Inventory (USFWS 2026a). Based on review of these data and observations during the field visit (Section 3.4), wetlands and surface waters that provide habitat for aquatic species may be located within the Project Area. Several stream features are present within the Project Area. These waterways could provide habitat for aquatic and semi-aquatic species. Most of the streams and creeks observed during the field visit were ephemeral; therefore, they could provide seasonal habitat for species when water is present. The stream features observed in the Project area do not support the threatened and endangered species that are expected to occur in the area. A separate wetland delineation was conducted for this Project, and details regarding the findings can be found in the corresponding report (Tetra Tech 2026a).

3.3 Management Areas and Areas of Biodiversity Significance

Federal and state agencies maintain conservation areas to help conserve natural habitats critical to migratory birds and other sensitive species (e.g., National Wildlife Refuges, National Grasslands, State Parks, State Wildlife Movement Areas and Corridors). A query of state and federal spatial databases identified the Maricopa County Wildlife Movement Area approximately 8.5 miles south of the Project Area (AZGFD 2012; AZGFD 2026a; Figure 4). Arizona Wildlife Movement Areas and corridors are natural or planned landscape connections designed to allow native species to move safely between isolated habitat blocks. There is no USFWS-designated critical habitat within the Project Area (USFWS 2026e; Attachment D).

3.4 Field Visit Observations

Field observations of landscape characteristics (i.e., land cover and topography) in the Project Area aligned with desktop results (Attachment A). The Project Area was primarily shrub-invaded semidesert grassland and desert scrub. The dominant overstory species were creosote bush (*Larrea tridentata*), velvet mesquite (*Neltuma velutina*), and cholla (*Cylindropuntina* spp). Other plant species included palo verde (*Parkinsonia aculeata*), white bursage (*Ambrosia dumosa*), fishhook barrel cactus (*Ferocactus wislizeni*), desert ironwood (*Olneya tesota*), cat-claw acacia (*Acacia greggii*), and scattered saguaro (*Carnegiea gigantea*).

In the western portion of the Project Area, a man-made ephemeral canal was observed flowing west to east. This feature resulted from the construction of a dirt road, which created an embankment that redirects drainage flow toward the eastern portion of the Project Area. The Project Area was generally flat with ephemeral streams. Several ephemeral streams contained larger, denser vegetation with more herbaceous vegetation compared to uplands (xeroriparian). Xeroriparian habitats provide dense cover in an otherwise open landscape, serving as critical wildlife movement corridors. These features function as “highways,” allowing wildlife to travel safely between mountain ranges and isolated habitat patches.

No threatened or endangered species were observed within the Project Area during the field visit. One species of greatest conservation need, western burrowing owl (*Athene cunicularia hypugaea*) was observed within the Project Area. A complete list of observed plant and wildlife species is provided in Attachment C.

Most wildlife species observed were small birds, including phainopela (*Phainopela nitens*), black-throated sparrow (*Amphispiza bilineata*), and western meadowlarks (*Sturnella neglect*). There was one raptor observed, the northern harrier (*Circus hudsonius*), within the Project Area. Inactive songbird and other small bird nests were found incidentally throughout the Project Area in mesquite and desert ironwood trees. One small unknown raptor nest was seen on a large saguaro arm within the Project Area (Figure 5; Attachment A). No eagle nests were observed within the Project Area.

Burrows and mammal signs were observed throughout the Project Area. Burrows ranged in size, indicating the presence of small- to medium-sized mammals (e.g., kit fox and rodents), reptiles, and invertebrates. Burrows in the Project Area may be suitable for Sonoran Desert tortoises (*Gopherus morafki*) and western burrowing owls, which are both state Species of Greatest Conservation Need (SGCN) (see Section 3.7.1; Figure 5).

3.5 Special-Status Wildlife

There are three federally listed and two state SGCN wildlife species that are known to occur or believed to occur in Arizona (USFWS 2026b; AZGFD 2026a). A list of federally and state listed species and other special-status species (e.g. eagles protected by the Bald and Golden Eagle Protection Act [BGEPA]) that potentially occur within the Project Area was compiled based on review of the USFWS IPaC online tool (USFWS 2026a; Attachment D) and Arizona Environmental Review Tool (AZDGF 2026a; Attachment B) and are shown in Table 2. The special-status species that have a moderate or high likelihood of occurrence within the Project Area are discussed further in the sections below.

Table 2. Federal and State Special-Status Wildlife Species with Potential to Occur in the Project Area

Common Name	Scientific Name	Federal / State Status[1]	Species-Habitat Associations	Project Area Likelihood of Occurrence[2]
Birds				
Bald eagle	*Haliaeetus leucocephalus*	BGEPA/-	Bald eagles typically nest in forested areas adjacent to large bodies of water. They perch in tall, mature trees or on poles that afford a wide view of the surroundings. In winter, they can be seen in dry, open uplands if there is access to open water for fishing. Their diet comprises mainly fish, followed by small mammals, birds, and potentially other small vertebrates.	Non-breeding: Low Breeding: Unlikely
Golden Eagle	*Aquila chrysaetos*	BGEPA/-	Golden eagles generally inhabit open and semi-open country such as prairies, sagebrush, savannah or sparse woodland, and barren areas, especially in hilly or mountainous regions. They inhabit areas with sufficient mammalian prey base and near suitable nesting sites. Golden eagles nest on rock ledges, cliffs, or in large trees.	Non-breeding: Moderate Breeding: Unlikely
Southwest willow flycatcher	*Empidonax traillii extimus*	FE/-	Southwest willow flycatchers can be found in riparian corridors, favoring dense thickets of trees and shrubs near surface water or saturated soils in the arid American Southwest. Breeding habitat typically consists of broad, flat floodplains featuring high-density vegetation.	Non-breeding: Low Breeding: Unlikely
Yellow-billed cuckoo	*Coccyzus americanus*	FT / ST	Yellow-billed cuckoos are riparian obligates, and they breed in vegetation along rivers, streams, and other wetlands. Nesting and foraging occur in areas of relatively dense and expansive growths of trees and shrubs consisting of willows (*Salix* spp.), cottonwoods (*Populus* spp.), and mesquite (*Prosopis* spp.).	Non-breeding: Low Breeding: Unlikely
Fishes				
Gila topminnow	*Poeciliopsis occidentalis*	FE / SE	Gila topminnows use shallow shorelines and slackwater areas of small streams, springs, and marshes. They concentrate in protected inlets, shoreward of sandbars or debris, or are associated with aquatic or streamside vegetation. This species is often in shallow, warm water in a moderate current with dense aquatic vegetation and algae mats. Topminnows can withstand a wide range of water temperatures and chemistries.	Unlikely.
Insects				
Monarch butterfly	*Danaus plexippus*	PT / -	Monarch butterflies are found throughout the United States in open fields and meadows. Milkweed (primarily *Asclepias* spp.) is an obligate host plant for monarch larvae. Milkweed is a diverse genus found in open fields, roadside, wet, and urban areas. Adult monarchs are not limited to milkweeds and may feed on a variety of flowering plants.	Moderate.

1/ AZGFD = Arizonia Game and Fish Department, BGEPA = Bald and Golden Eagle Protection Act, EXPN = Experimental Non-essential Population, FC = Federal Candidate, FE = Federally Endangered, FT = Federally Threatened, ST = State Threatened, SE = State Endangered

2/ Sources: ADW 2026; Audubon 2026a, 2026b, 2026c; AZGFD 2026a, 2026b, 2026d; Buehler 2022; Cornell Lab of Ornithology 2026; eBird 2026; NatureServe 2026; USFWS 2026b-2026g

3/ Unlikely = little to no habitat in Project Area and vicinity; Low = marginally suitable habitat features in Project Area and vicinity; Moderate = habitat present in Project Area, or species known to occur in similar environments; High = strong species-habitat associations present in Project Area, or known populations exist in Project Area vicinity.

* SGCN Tier 1

The golden eagle (*Aquila chrysaetos*) is protected under the BGEPA. Golden eagles in the western United States are commonly associated with open and semi-open habitats, such as shrublands, grasslands, woodland-brushlands, and coniferous forests, as well as farmland and riparian habitats (Katzner et al. 2020). Golden eagles usually nest on cliff faces, though they will nest in large trees or human-made structures (Cornell Lab of Ornithology 2026). Breeding areas vary by region, but are generally associated with mountainous canyon land, rimrock terrain of open desert, grassland areas, riparian habitats, and occasionally forested areas (Katzner et al. 2020). Wintering habitat includes open areas with native vegetation such as sagebrush communities, riparian areas, grasslands, and rolling oak savanna. This species feeds upon a wide variety of prey species but tends to hunt small- to medium-sized mammals such as rabbits, ground squirrels, and prairie dogs (*Cynomys* spp.), depending upon local availability. Golden eagles are also known to opportunistically forage on carrion (Katzner et al. 2020).

The likelihood of occurrence for golden eagles within the Project Area is low for breeding individuals and moderate for nonbreeding individuals. There are three observations within an approximate 10-mile radius of the Project Area (eBird 2026). The Project Area contains habitat that may be used for foraging. Poles, transmission towers, and snags may serve as perching and, less commonly, roosting spots for eagles. The relatively short, bushy trees in the Project Area (mesquite and palo verde) are unlikely to provide nesting habitat for golden eagles. Signs of prey species (i.e., small mammal burrows and tracks) were observed in the Project Area (see Section 3.4; Appendices A and B).

On December 10, 2024, the monarch butterfly (*Danaus plexippus*) was proposed as threatened under the Endangered Species Act (ESA). Consultation with the USFWS under Section 7 of the ESA is not required for proposed species; however, the monarch butterfly is evaluated here as it may become listed prior to Project construction.

Monarch butterflies occur in a variety of environments, and they are present in Arizona throughout the year (Morris et al. 2015). In the low deserts of Arizona, breeding monarchs are more common in the fall, especially September, compared to the spring. During spring migration (March through June), small numbers of breeding monarchs pass through the lower deserts. By mid-June, as temperatures rise above 100 degrees Fahrenheit, they leave for higher elevations. A small population of monarchs in Arizona do not migrate and will spend winter in the low deserts (Morris et al. 2015).

Monarchs require milkweed (*Asclepias* spp.) host plants to lay their eggs (USFWS 2026f), and there are approximately 30 native species of milkweeds in Arizona (NPN 2026). There was one milkweed species observed during the field survey; however, adult monarch butterflies rely on a variety of nectar sources throughout migration and will visit other flowering plant species (Morris et al. 2015).

The Project Area contains migratory and foraging habitat for monarch butterflies; the likelihood of occurrence for this species is moderate.

3.6 Other Species of Concern

SGCN receive attention and management considerations due to their ecological importance and potential vulnerability in Arizona. The SGCN designation carries no regulatory protection, but SGCN may carry additional statuses, such as ESA or MBTA protections. Some SGCN species are closely monitored by the AZGFD, such as the Sonoran Desert tortoise (Tier 1) and western burrowing owl (Tier 2), and these species are discussed further in the sections below. A complete list of SGCN species with the potential to occur in the Project Area is provided in Attachment C. Based on Tetra Tech's prior experience with projects in Arizona, the AZGFD may request species-specific surveys and Project-specific mitigation measures to reduce potential impacts to these species during Project development.

Sonoran Desert tortoises occur in desert scrub environments on rocky hillsides and bajadas in the Sonoran Desert, often with palo verde and saguaro cactus communities and desert grasslands (AZGFD 2026d; Desert Tortoise Council 2026). Low-density populations occur along alluvial fans and in intermountain valleys, where desert washes and associated caliche caves provide shelters (NatureServe 2026). They require loose soil in which to excavate shelters, though these tortoises may also utilize existing natural structures (AZGFD 2026b). Shrubs, such as creosote bushes, are important habitat features to provide shade (Desert Tortoise Council 2026).

Shrub/scrub throughout the Project Area may provide habitat for this species. No tortoises or tortoise sign (e.g., scrapes at the burrow entrance, carcasses, or scat) were observed, although the survey occurred outside of their primary active season (July through September). Burrows suitable for tortoises were observed during the field survey (See section 3.4; Attachment A). To avoid potential impacts to this species during Project development, the AZGFD may recommend a tortoise-specific review, surveys, or avoidance measures.

Western burrowing owls inhabit open areas with low, sparse vegetation, usually on gently sloping terrain (Audubon 2026c; Cornell Lab of Ornithology 2026), in grasslands, steppes, deserts, prairies, and agricultural lands. Western burrowing owls have also been observed in vacant lots, golf courses, and airports, and are often associated with burrowing mammal colonies, such as prairie dogs (AZGFD 2026b).

The Project Area is within year-round range of western burrowing owls and contains potential habitat. Western burrowing owls are closely monitored by AZGFD and one burrowing owl was flushed during the field visit within the Project Area (See section 3.4; Attachment C). Burrows suitable for burrowing owls were observed throughout the Project Area (Attachment A). Several signs (e.g., whitewash or pellets) were also observed.

Surveys are recommended prior to construction (AZGFD 2026e). The Arizona Burrowing Owl Working Group provides guidance documents to help project planners and developers address burrowing owls on lands that will be developed (AZGFD 2026e). They are a management tool to help project planners reduce violations under federal and state regulations. To avoid potential impacts to this species

during Project development, the AZGFD may recommend a burrowing owl-specific review, surveys, or avoidance measures.

There were no state restricted noxious weeds observed; however, two state invasive, non-native species (Russian thistle and Bermuda grass) were observed during the field survey. Both species are listed as “medium” on AZ-WIPWG’s list of invasive nonnative plants that threaten wildlands in Arizona (AZ-WIPWG 2005). Plant species ranked medium by the AZ-WIPWG have substantial and apparent ecological impacts on ecosystems, plant and animal communities, and vegetation structure. Plant species protected by the Native Plant Law (NPL) were also present (Attachment C). Some of the NPL-protected native plant species observed in the Project Area include cholla cactus (*Cylindropuntia* Spp.), Graham’s nipple cactus (*Echinocereus grahamii*), fishhook barrel cactus, saguaro cactus, and velvet mesquite. Plants on the NPL that carry no other protections (e.g., by the ESA) are unlikely to preclude Project development; however, special permits are required to remove, harm, or transport these plants. A separate native plant inventory was conducted for this Project, and details regarding the findings can be found in the corresponding report (Tetra Tech 2026b).

Tracks and scat belonging to javelina (*Pecari tajacu*) and mule deer (*Odocoileus hemionus*), big game species managed by the AZGFD, were observed in Project Area (Attachment C). Fencing, if part of the Project design, may restrict big game movement and habitat connectivity. Designing structures, fences, and roadways to facilitate passage for big game and other wildlife can contribute to maintaining biodiversity and ecosystem functions. The Maricopa wildlife movement area is a critical landscape linkage that facilitates the movement of species between the Harcuvar Mountains and the Harquahala Mountains Wilderness areas. The AZGFD provides wildlife-friendly guidelines for project fencing and other structures (AZGFD 2026c).

4.0 CONCLUSION

Desktop and field survey results indicate that one federally protected species and one federally proposed threatened species have a moderate to high likelihood of occurrence in the Project Area: the golden eagle and monarch butterfly. The remaining threatened or endangered species identified by the USFWS IPaC and AZGFD Environmental Review Tool for this Project have an unlikely or low potential of occurrence in the Project Area.

Golden eagles have a moderate likelihood of passing over or foraging in the Project Area; however, because they have a low likelihood of nesting within the Project Area, Project construction and operation is not expected to impact this species.

Monarchs require milkweed (*Asclepias* spp.) host plants to lay their eggs (USFWS 2026f), and one milkweed species was observed during the field survey. The Project Area contains migratory and foraging habitat for monarch butterflies; therefore, the likelihood of occurrence for this species is moderate. Consultation with USFWS under Section 7 of the ESA is not required for monarchs. As a federally proposed threatened species, it is not currently protected under the ESA; however, consultation with USFWS is still recommended.

The Project Area contains potential habitat for the Sonoran Desert tortoise and western burrowing owl, SGCN that are closely monitored by the AZGFD. Focused surveys may be required prior to construction for both species, and coordination with the AZGFD is recommended to discuss Project-specific surveys and measures to reduce potential impacts on these species.

Inactive small bird stick nests were found throughout the Project Area, as well as one small unknown raptor nest. Active migratory bird nests are protected by the MBTA; therefore, it is recommended to conduct a raptor nest survey during the early stages of the project. If construction is scheduled during the breeding season, this should include MBTA nest clearance to protect active nests.

The Project Area does not overlap or border USFWS-designated critical habitat. An AZGFD-designated wildlife connectivity zone is located approximately 8.5 miles southeast of the Project Area. Using wildlife friendly fencing is recommended to allow for wildlife movement and avoid impacts to species within and near the Project Area.

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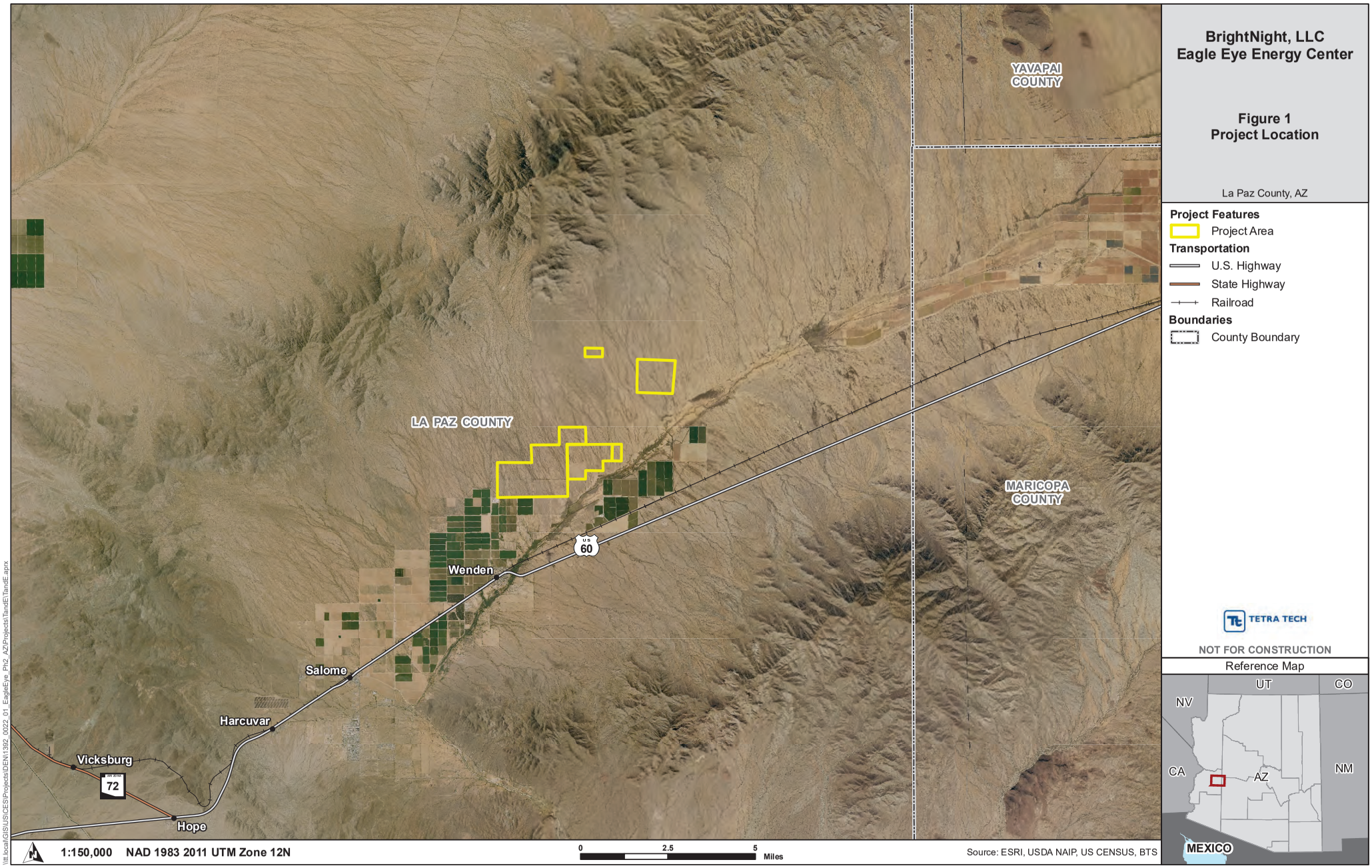
FIGURES


YAVAPAI COUNTY
LA PAZ COUNTY
MARICOPA COUNTY
US 60
Wenden
Salome
Harcuvar
Vicksburg
AZ 72
Hope
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0 2.5 5 Miles
Source: ESRI, USDA NAIP, US CENSUS, BTS
BrightNight, LLC
Eagle Eye Energy Center
Figure 1
Project Location
La Paz County, AZ
Project Features
Project Area
Transportation
U.S. Highway
State Highway
Railroad
Boundaries
County Boundary
TETRA TECH
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Reference Map
UT
CO
NV
CA
AZ
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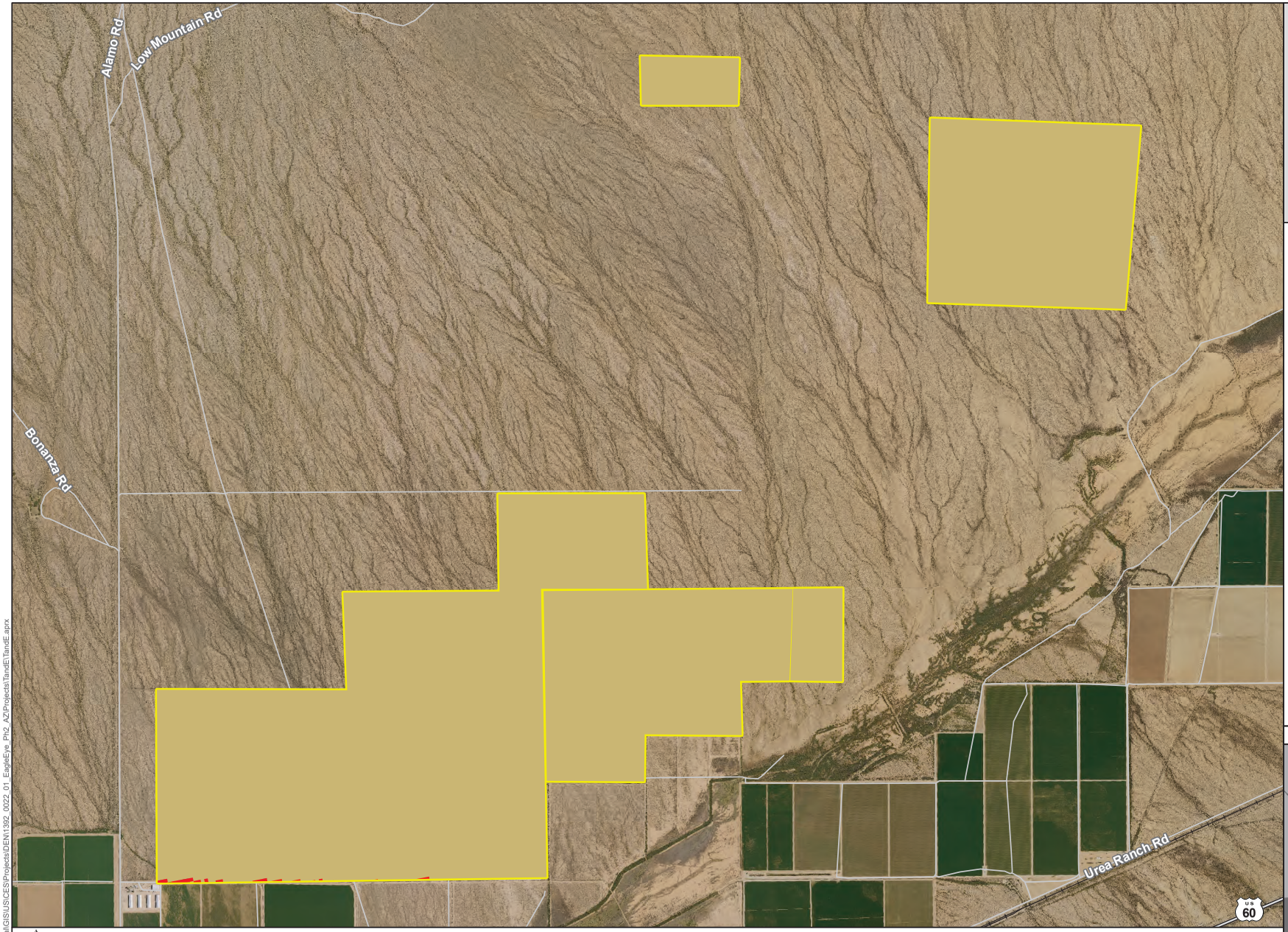
MEXICO



BrightNight, LLC
Eagle Eye Energy Center

Figure 2
Land Cover

La Paz County, AZ

Project Features
- Project Area

Transportation
- U.S. Highway
- Local Road
- Railroad

Land Cover Type
- Developed, Open Space
- Shrub/Scrub
- Cultivated Crops

TETRA TECH

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Reference Map

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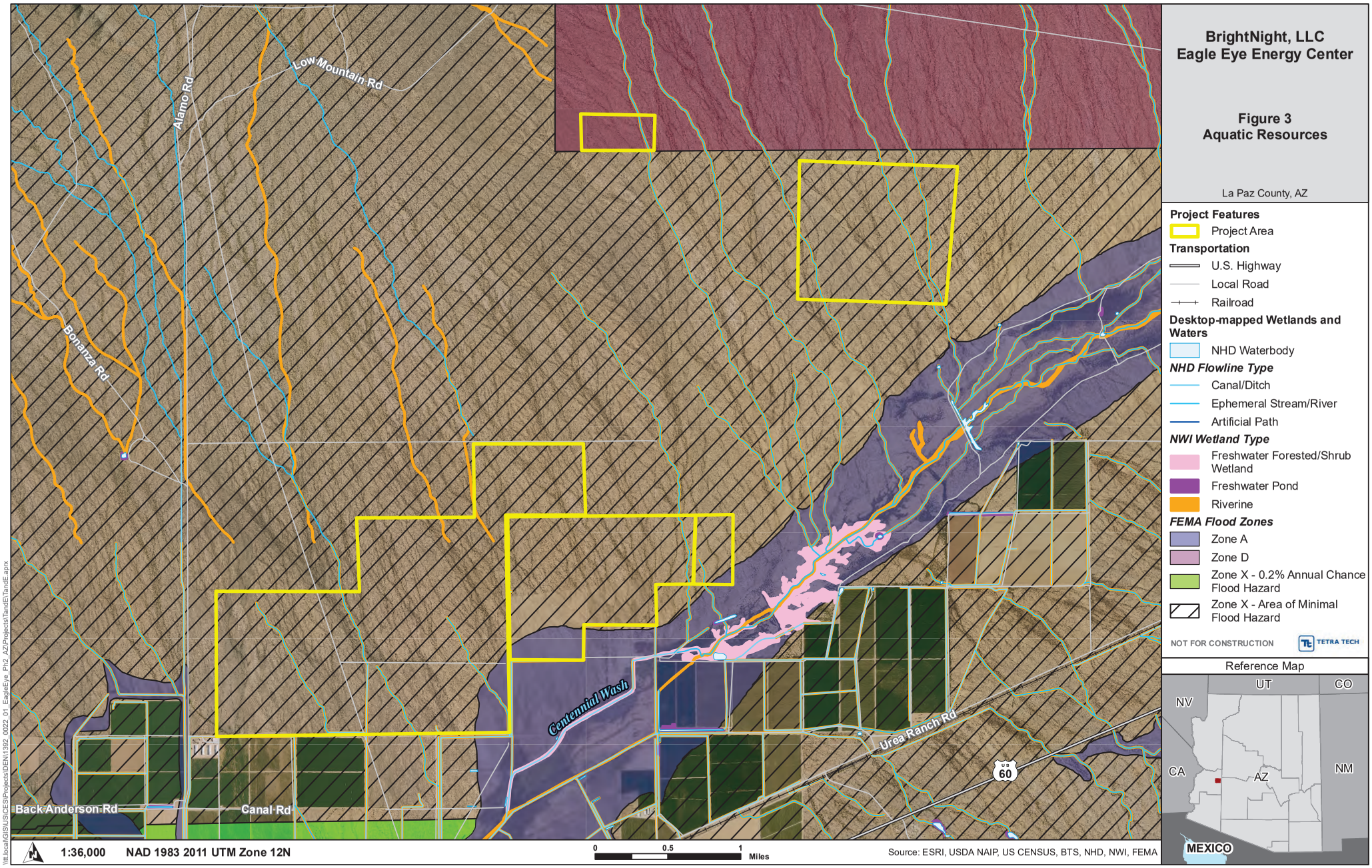
Low Mountain Rd
Alamo Rd
Bonanza Rd
Centennial Wash
Urea Ranch Rd
US 60
Back Anderson Rd
Canal Rd
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NAD 1983 2011 UTM Zone 12N
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1
Miles
Source: ESRI, USDA NAIP, US CENSUS, BTS, NHD, NWI, FEMA
BrightNight, LLC
Eagle Eye Energy Center
Figure 3
Aquatic Resources
La Paz County, AZ
Project Features
Project Area
Transportation
U.S. Highway
Local Road
Railroad
Desktop-mapped Wetlands and Waters
NHD Waterbody
NHD Flowline Type
Canal/Ditch
Ephemeral Stream/River
Artificial Path
NWI Wetland Type
Freshwater Forested/Shrub Wetland
Freshwater Pond
Riverine
FEMA Flood Zones
Zone A
Zone D
Zone X - 0.2% Annual Chance Flood Hazard
Zone X - Area of Minimal Flood Hazard
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Reference Map
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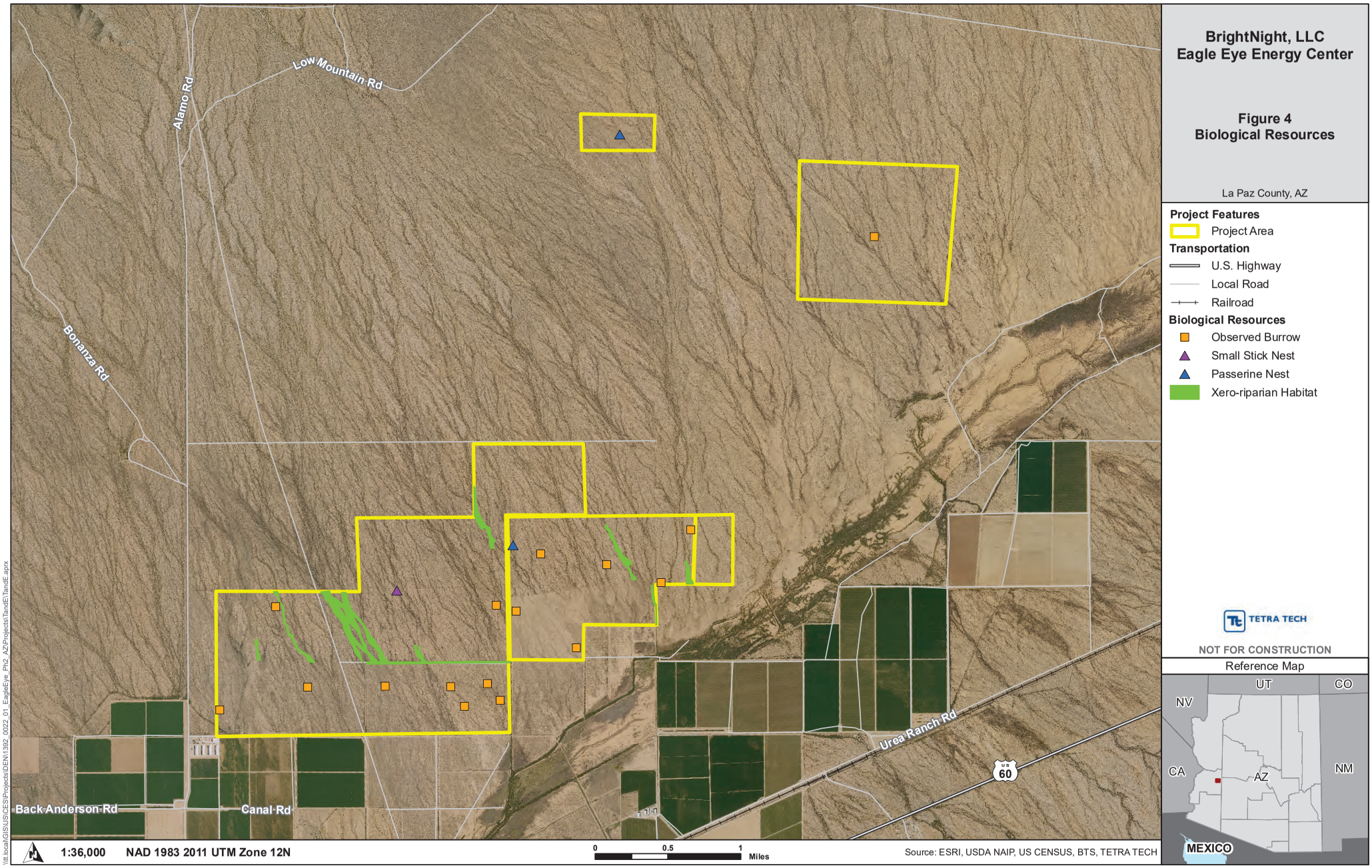
NV
CA
AZ
NM
MEXICO



BrightNight, LLC
Eagle Eye Energy Center

Figure 4
Biological Resources

La Paz County, AZ

Project Features
- Project Area

Transportation
- U.S. Highway
- Local Road
- Railroad

Biological Resources
- Observed Burrow
- Small Stick Nest
- Passerine Nest
- Xero-riparian Habitat

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Reference Map

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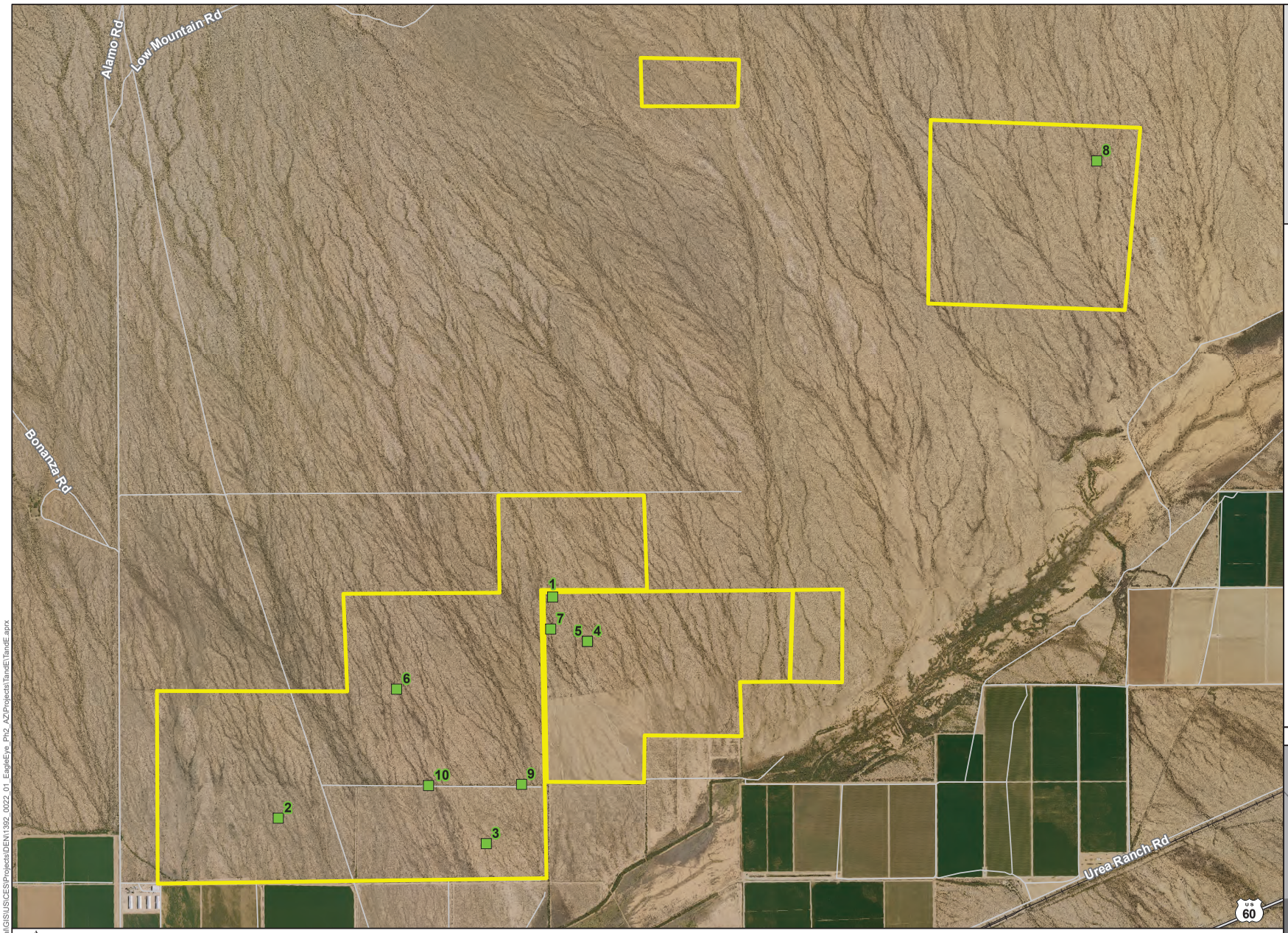

BrightNight, LLC
Eagle Eye Energy Center

Figure 5
Photo Log

La Paz County, AZ

Project Features
- Photo Log Location
- Project Area

Transportation
- U.S. Highway
- Local Road
- Railroad

TETRA TECH

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Reference Map

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Source: ESRI, USDA NAIP, US CENSUS, BTS, TETRA TECH

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ATTACHMENT A: REPRESENTATIVE PHOTOLOG

Photograph 1. General overview of dominant habitat consisting of creosote bush.

Photograph 2. View of a fresh small mammal burrow

Photograph 3. Whitewash observed inside of a burrow, where the burrowing owl was flushed

Photograph 4. Owl pellet found outside of burrow

Photograph 5. View of burrow under a creosote bush

Photograph 6. Small unknown raptor stick nest observed on a saguaro.

Photograph 7. Small passerine nest observed in catclaw acaccia

Photograph 8. Mojave milkweed observed within the Project Area

Photograph 9. View of xero-riparian habitat

Photograph 10. View of xero-riparian habitat.

ATTACHMENT B: ARIZONA ENVIRONMENTAL REVIEW TOOL FOR THE EAGLE EYE ENERGY CENTER PROJECT

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.

Based on the project type entered, no further review is needed. Please review the entire report for project type and/or species recommendations for the location information entered. If you have questions about the project/species specific recommendations, please contact the Project Evaluation Program directly at PEP@azgfd.gov.

Project Name:
Eagle Eye TE

Project Type:
Education/Information

Project ID:
HGIS-27127

User Project Number:
TT

Project Description:
Prelim Data for proposed project

Contact Person:
Frank Acosta

Organization:
Tetra Tech

On Behalf Of:
OTHER

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.

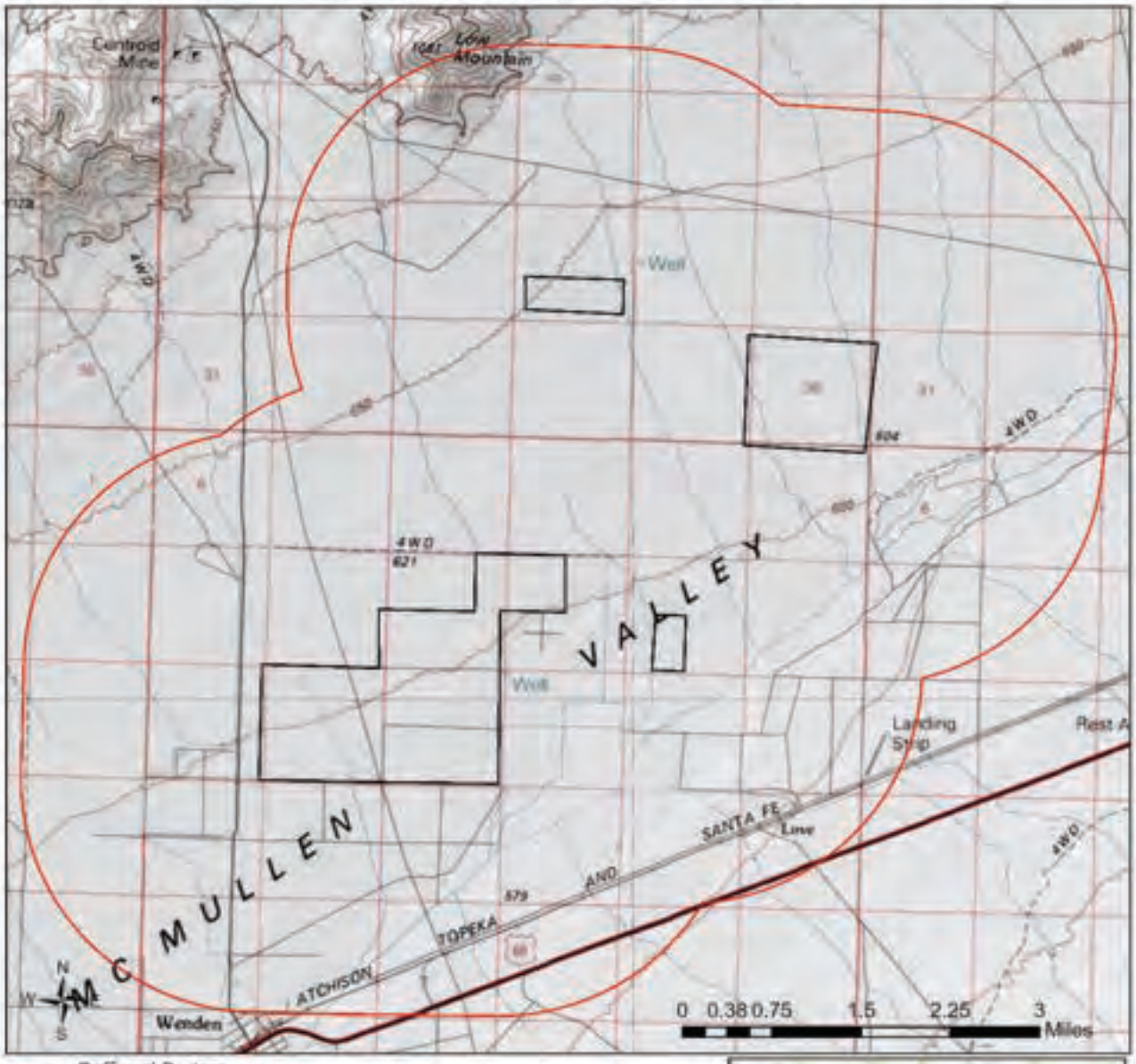
Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

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.

Eagle Eye TE

USA Topo Basemap With Locator Map



Buffered Project Boundary

Project Boundary

Project Size (acres): 2,701.48

Lat/Long (DD): 33.8794 / -113.5036

County(s): La Paz

AGFD Region(s): Yuma

Township/Range(s): T6N, R12W; T7N, R11W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME +

County of Yavapai, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
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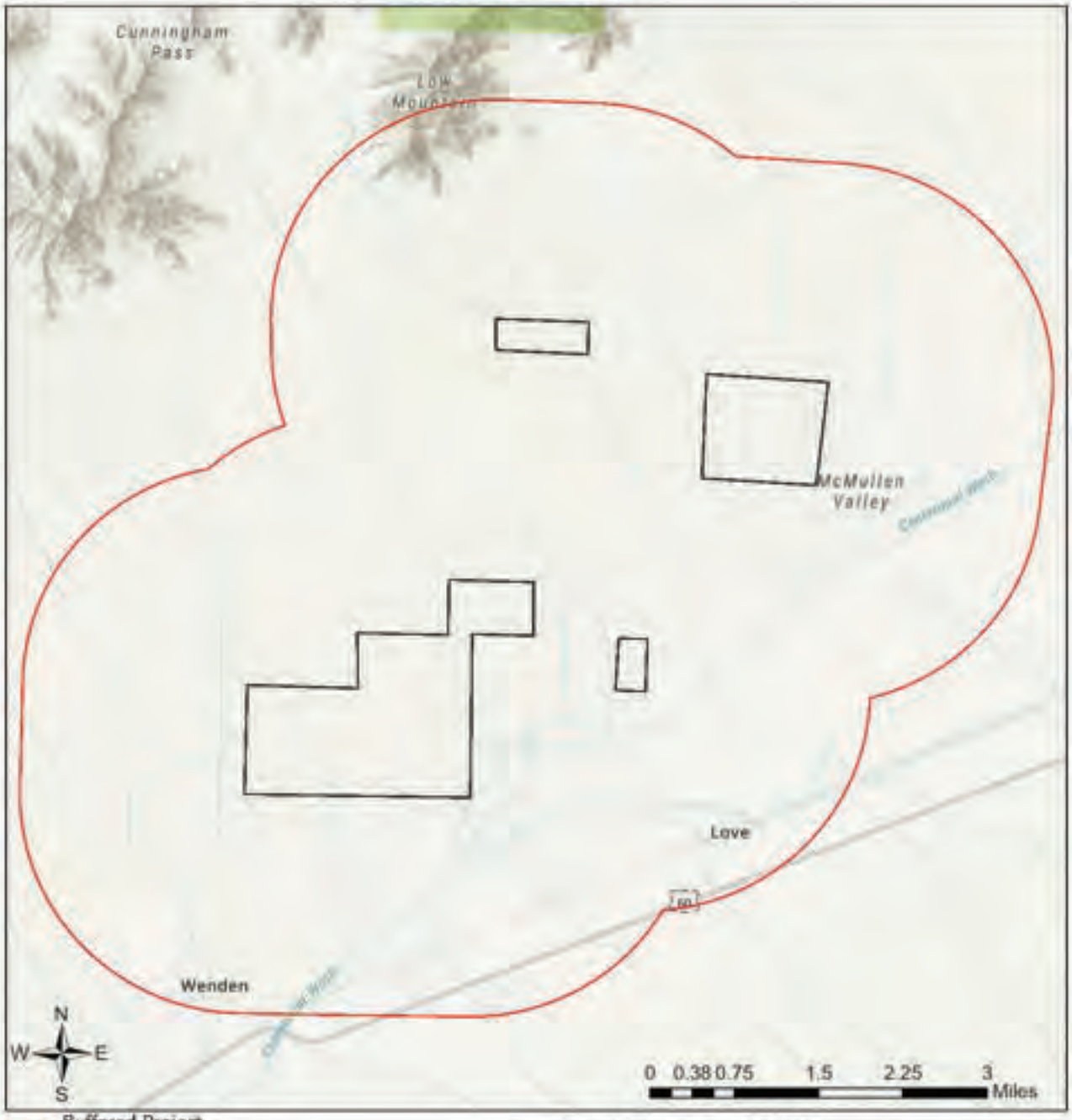
Esri, USGS

Eagle Eye TE

Important Areas



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

Project Size (acres): 2,701.48

Lat/Long (DD): 33.8794 / -113.5036

County(s): La Paz

AGFD Region(s): Yuma

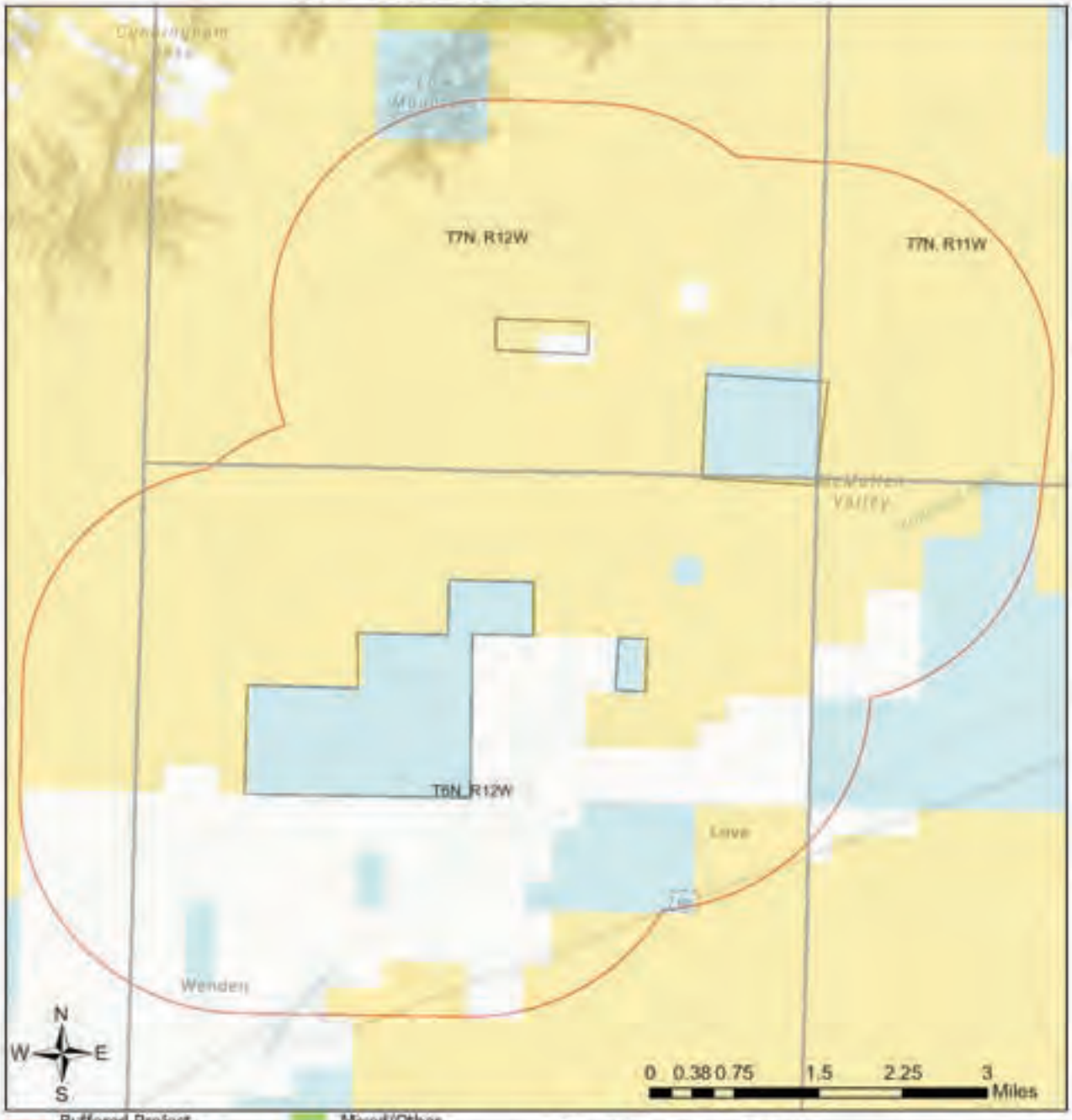
Township/Range(s): T6N, R12W; T7N, R11W; T7N, R12W

USGS Quad(s): CUNNINGHAM PASS; SALOME +

Esri, NASA, NGA, USGS
Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

Eagle Eye TE

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): 2,701.48
Lat/Long (DD): 33.8794 / -113.5036
County(s): La Paz
AGFD Region(s): Yuma
Township/Range(s): T6N, R12W; T7N, R11W; T7N, R12W
USGS Quad(s): CUNNINGHAM PASS; SALOME +

Esri, NASA, NGA, USGS
Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

Special Status Species Documented within 2 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
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Incilius alvarius	Sonoran Desert Toad					2
Lanius ludovicianus	Loggerhead Shrike					2
Perognathus amplus	Arizona Pocket Mouse					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
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
Asio otus	Long-eared Owl					2
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Auriparus flaviceps	Verdin					2
Buteo regalis	Ferruginous Hawk			S		2
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

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
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
Icterus bullockii	Bullock's Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Lanius ludovicianus	Loggerhead Shrike					2
Lasiurus cinereus	Hoary Bat					2
Lasiurus frantzii	Desert Red Bat		S			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
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					

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Education/Information

Project Type Recommendations:
Based on the project type entered (information/education), no impacts to wildlife resources are anticipated. Therefore, no project type recommendations are provided. If this project type was entered by mistake, please contact the PEP program (PEP@azgfd.gov or 623-236-7600) to change the project type.

Project Location and/or Species Recommendations:
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.

ATTACHMENT C: SPECIES OBSERVED DURING THE FIELD VISIT

Common Name	Scientific Name	Federal and State Status[1]
Birds		
Black-throated sparrow	*Amphispiza bilineata*	-
Common raven	*Corvus corax*	-
Gambel's quail	*Callipepla gambelii*	-
Greater roadrunner	*Geococcyx californianus*	-
House finch	*Haemorhous mexicanus*	-
Mourning dove	*Zenaida macroura*	-
Northern harrier	*Circus hudsonius*	SGCN 2
Phainopepla	*Phainopepla nitens*	-
Western burrowing owl	*Athene cunicularia hypugaea*	SGCN 2
Invertebrates		
Butterfly spp.	*Lepidoptera spp.*	-
Desert blonde tarantula	*Aphonopelma chalcodes*	-
Leaf-cutter ant	*Acromyrmex versicolor*	-
Tarantula wasp	*Pepsis grossa*	-
Mammals		
Black-tailed jackrabbit	*Lepus californicus*	-
Coyote (Scat, tracks)	*Canis latrans*	-
Desert cottontail	*Sylvilagus audubonii*	-
Javelina (Tracks)	*Pecari tajacu*	-
Kit fox (burrows, tracks)	*Vulpes macrotis*	SGCN 2
Mule deer (Tracks)	*Odocoileus hemionus*	-
Reptiles		
Common side-blotched lizard	*Uta stansburiana*	-
Western whiptail	*Aspidoscelis tigris*	-
Zebra-tailed lizard	*Callisaurus draconoides*	-
Plants		
Arizona pencil cholla	*Cylindropuntia arbuscula*	SR
Bermuda grass	*Cynodon dactylon*	-
Big galleta	*Hilaria rigida*	-
Branched pencil cholla	*Cylindropuntia ramosissima*	SR
Bush muhly	*Muhlenbergia porteri*	-
Catclaw acacia	*Acacia greggii*	-
Cheesebush	*Ambrosia salsola*	-
Christmas cholla	*Cylindropuntia leptocaulis*	SR
Creosote bush	*Larrea tridentata*	-
Desert broom	*Baccharis sarothroides*	-
Desert fluff-grass	*Dasyochloa pulchella*	-
Desert globemallow	*Sphaeralcea ambigua*	-

Desert Thorn Apple	*Datura discolor*	-
Emory's crucifixion thorn	*Castela emoryi*	SR
Fishhook barrel cactus	*Ferocactus wislizeni*	SR
Graham's nipple cactus	*Mammillaria grahamii*	SR
Kunze's cholla	*Grusonia kunzei*	SR
Mexican paloverde	*Parkinsonia aculeata*	SR
Mesquite mistletoe	*Phoradendron clifornicum*	-
Mojave milkweed	*Asclepias nyctaginifolia*	-
Ocotillo	*Fouquieria splendens*	SR
Pale desert-thorn	*Lycium pallidum*	SR
Pink-flower hedgehog cactus	*Echniocereus fendleri*	SR
Russian thistle	*Salsola tragus*	-
Sacred datura	*Datura wrightii*	-
Saguaro	*Carnegiea gigantea*	HS
Silver cholla	*Cylindropuntina echinocarpa*	SR
Southwestern pipevine	*Aristolochia watsonii*	-
Tree cholla	*Cylindropuntia imbricata*	SR
Velvet mesquite	*Neltuma velutina*	SA, HR
White bursage	*Ambrosia dumosa*	-
Woolly honeysweet	*Titesrtomia languinosa*	-

1. SGCN 1/2 = Species of Greatest Conservation Need Tier 1/2; HS = Highly Safeguarded [Native Plant Law A.R.S. Section 3-903(B)(1), for which removal is not allowed except as provided in R3-3-1105]; SR = Salvage Restricted (permit required for removal), SA = Salvage Assessed (permit required for removal), HR = Harvest Restricted (permit required for cutting or removal).

ATTACHMENT D: U.S. FISH AND WILDLIFE INFORMATION FOR PLANNING AND CONSULTATION RESOURCES LIST FOR THE EAGLE EYE ENERGY CENTER PROJECT

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

La Paz County, Arizona

Local office

Arizona Ecological Services Field Office

(602) 242-0210
(602) 242-2513

9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. 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.

The following species are potentially affected by activities in this location:

Birds

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

Fishes

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

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Insects

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

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

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 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).

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 https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- 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

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

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Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate 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.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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.

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

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

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.

Review the FAQs
The FAQs below provide important additional information and resources.

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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 (▪)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

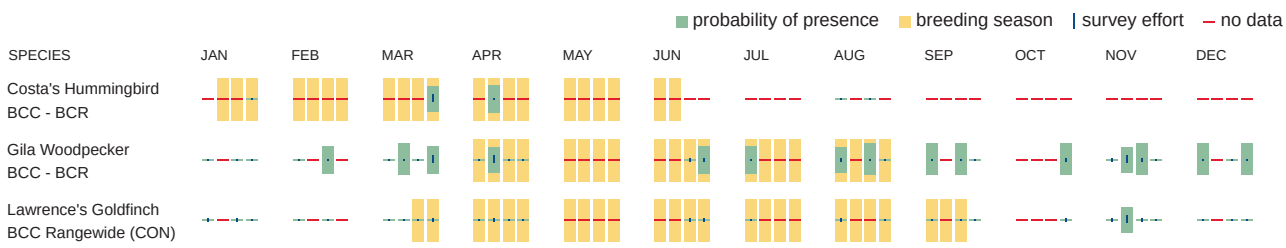
Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

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

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the

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probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate 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.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

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 at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

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.

This location overlaps the following wetlands:

RIVERINE
- R4SBC
- R5UBFx

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R4SBJ

A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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Tetra Tech is Leading with Science® to provide innovative, sustainable solutions that help our clients address their water, environment, infrastructure, resource management, energy, and international development challenges. We are proud to be home to leading technical experts in every sector and to use that expertise throughout the project life cycle. Our commitment to safety is ingrained in our culture and at the forefront

EXHIBIT D
BIOLOGICAL RESOURCES

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

List the fish, wildlife, plant life, and associated forms of life in the vicinity of the proposed site or route and describe the effects, if any, the proposed facilities will have thereon.

Introduction

To identify the plant and wildlife species that may occur in the vicinity of the proposed Eagle Eye Thermal Plant and Gen-Tie Project (Project), KP Environmental, Inc. (KPE) consulted publicly available data sources, including:

- Topographical and aerial maps and land use, land cover, and elevation data.
- Arizona Game and Fish Department (AZGFD) Online Environmental Review Tool (AZGFD 2026a)
- The following resources were utilized to analyze the potential occurrence of common plant life, mammals, birds, reptiles, and amphibians:
    - Biotic Communities: Southwestern United States and Northwestern Mexico (Brown 1994).
    - The Mammals of Arizona. University of Arizona Press (Hoffmeister 1986).
    - Arizona Breeding Bird Atlas. University of New Mexico Press (Corman and Wise-Gervais 2005).
    - A Field Guide to Western Reptiles and Amphibians. Peterson Field Guides (Stebbins 1985).

In addition, several surveys and technical reports have been prepared for the Eagle Eye Energy Center (Energy Center), which includes the proposed Thermal Plant and Gen-Tie Project discussed in this CEC application as well as non-jurisdictional components that are excluded from this CEC application such as the solar photovoltaic (PV) generation facility and battery energy storage system (BESS). These reports were reviewed and relevant information from field surveys was incorporated alongside available online resources to assess the potential presence of species within the Project area. The findings from these reports and surveys were taken into account for species analysis and tables in **Exhibit C.** The referenced studies are included below:

- Threatened and Endangered Species Memorandum for the Eagle Eye Energy Center in La Paz County, Arizona (February 2026). In support of the desktop review, Tetra Tech Biologists conducted a biological habitat assessment field visit from December 11 – 18, 2025. These surveys were conducted in the vicinity of the Project area and the Thermal Plant site on private land (see **Exhibit C-3). S**pecies observed during the habitat these surveys are included in **Table D-1**.

Existing Conditions

The proposed Project is within the Arizona Upland/Eastern Sonoran Basins ecoregion (Griffith et al. 2014). Existing land uses around the Project include agricultural, open space, residential, and public and semi-public land. The Project is crossed by numerous ephemeral washes that support cactus, xeroriparian and desert scrub habitat, and are densely vegetated and more diverse. Habitat in the area is expected to be suitable for wildlife species that typically rely on desert and semidesert shrub vegetation communities as well as those that are adapted to disturbed and developed areas. There are no designated Wildlife Movement Areas, important connectivity zones, Important Bird Areas (IBAs), or critical habitat within or around the Project area. The vegetation communities found within the area are described below. **Table D-1** in **Exhibit D-1** lists the plant species that were observed in the vicinity of the project during field studies on State Lands.

Arizona Upland/Eastern Sonoran Basins Ecoregion

The Arizona Upland/Eastern Sonoran Basins ecoregion is characterized by broad alluvial plains, fans, and bajadas situated between higher-relief mountain ranges. Elevations generally range from 1,500 to 3,000 feet, though they can drop to about 900 feet in the north and rise to nearly 3,600 feet on upper slopes. The basin sediments are a mix of fluvial, colluvial, and alluvial deposits.

On the plains and lower bajadas, creosotebush (*Larrea tridentata*) and bursage (A*mbrosia spp.*) remain dominant, while thornscrub elements characteristic of the Arizona Upland begin to appear. The upper bajadas share similarities with mountain slope vegetation, featuring species such as saguaro (*Carnegiea gigantea*), foothills paloverde (*Parkinsonia microphylla*), ironwood (*Olneya tesota*), triangle-leaf bursage (*Ambrosia deltoidea*), ocotillo (*Fouquieria splendens*), mesquite (*Prosopis spp*.), acacias (*Acacia spp*.), various prickly pears (*Opuntia spp*.), and some bush muhly (*Muhlenbergia porteri*). (Tetra Tech 2026).

Common native plant species present within desert scrub habitat included desert broom (*Baccharis sarothroides*), creosote bush, white bursage (*Ambrosia dumosa*), desert globemallow (*Sphaeralcea ambigua*), big galleta (*Hilaria rigida*), woolly honeysweet (*Tidestromia lanuginosa*), catclaw (*Acacia greggii*), velvet mesquite (*Neltuma velutina*), desert fluff-grass (*Dasyochloa pulchella*), silver cholla (*Cylindropuntia echinocarpa*), Desert Ironwood, bush muhly, southwestern pipevine (*Aristolochia watsonii*), ocotillo, Fish-hook barrel cactus (*Ferocactus wislizeni*), Saguaro (*Carnegiea gigantea*), jumping cholla (*Cylindropuntia fulgida*), night-blooming cereus (*Peniocereus greggii*), Graham's nipple cactus (*Mammillaria grahamii*), Kunze club cholla (*Grusonia kunzei*), pale desert-thorn (*Lycium pallidum*), Emory's crucifixion thorn (*Castela emoryi*), and desert marigold (*Baileya multiradiata*). (Tetra Tech 2026).

Wildlife

Common wildlife species that have the potential to occur in the proposed Project area and the immediate vicinity are associated with desert scrub habitats. Representative bird species include elf owl (*Micrathene whitneyi*), gilded flicker (*Colaptes chrysoides*), Gila woodpecker (*Melanerpes uropygialis*), Costa's hummingbird (*Calypte costae*), LeConte's thrasher (*Toxostoma lecontei*), and Brewer's sparrow (*Spizella breweri*) (Arizona Bird Species Conservation Initiative and Sonoran Joint Venture 2023). **Table D-1** presents common and special status species that were

observed in the vicinity of the Project area during the biological habitat assessment performed by Tetra Tech in December 2025. Special status species observed during this study were included in the species analysis in **Exhibit C**.

Exhibit D-1 contains **Tables, D-1, D-2, D-3, D-4, D-5, D-6, and D-7** which include lists of common plant life, mammals, birds, reptiles, and amphibians potentially present in La Paz County and within the vicinity of the Project, and the species list from biological habitat analysis performed in the vicinity of the Project area. Some of the species are also listed in **Exhibit C** as Wildlife of Special Concern.

Summary of Potential Effects

Implementation of the Project will result in short-term and long-term disturbance to desert scrub, mesquite wash habitats, and disturbed and developed habitats, as well as to the wildlife that occupy these habitats. Short-term effects to resident wildlife could include possible displacement of animals caused by increased construction activity and noise levels in the proposed Project area. A short-term effect will be removal or damage to vegetation within the proposed right-of-way (ROW). Wildlife species are not expected to experience long-term detrimental effects from the loss or alteration of vegetative cover within the ROW based on the availability of other suitable and unaffected habitats in the vicinity of the Project. Construction of the Project could result in bird collisions with the transmission lines, support structures, or switchyard towers. This risk will be minimized by following industry standards that are aimed at reducing avian collisions and electrocutions (Avian Power Line Interaction Committee [APLIC] 2012, 2024). The Project is unlikely to affect wildlife movement, including larger mammals, if they are present.

Mitigation Measures

To the extent feasible, implementation of the mitigation measures provided in **Exhibit C** will reduce risk of animal injury or spread of invasive species. For mitigation measures specific to special status species, please see **Exhibit C**. The Applicant shall continue to work with AZGFD regarding the proposed measures below and will prepare a response letter to any measures that are deemed infeasible due to engineering constraints or other considerations.

References

Arizona Game and Fish Department (AZGFD). 2025. Arizona Environmental Review Tool Report, Project Eagle Eye Energy Center. Project ID: HGIS-25616. Accessed April 2026.

Avian Power Line Interaction Committee (APLIC). Revised electronic version 2022. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA.

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Brown, D.E. 1994. Biotic Communities: Southwestern United States and Northwestern Mexico. University of Utah Press, Provo, Utah.

Corman, T.E., and C. Wise-Gervais. 2005. Arizona Breeding Bird Atlas. Albuquerque: University of New Mexico Press.

Hoffmeister, D.F. 1986. Mammals of Arizona. University of Arizona Press and the Arizona Game and Fish Department, Tucson.

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EXHIBIT D-1
BIOLOGICAL RESOURCES TABLES

Table D-1 Species Observed During the Biological Habitat Assessment in the Vicinity of the Project	
Common Name	**Scientific Name**
Birds	
Black-throated sparrow	*Amphispiza bilineata*
Common raven	*Corvus corax*
Gambel's quail	*Callipepla gambelii*
Greater roadrunner	*Geococcyx californianus*
House finch	*Haemorhous mexicanus*
Mourning dove	*Zenaida macroura*
Northern harrier	*Circus hudsonius*
Phainopepla	*Phainopepla nitens*
Western burrowing owl	*Athene cunicularia hypugaea*
Invertebrates	
Butterfly spp.	*Lepidoptera spp.*
Desert blonde tarantula	*Aphonopelma chalcodes*
Leaf-cutter ant	*Acromyrmex versicolor*
Tarantula wasp	*Pepsis grossa*
Mammals	
Black-tailed jackrabbit	*Lepus californicus*
Coyote	*Canis latrans*
Desert cottontail	*Sylvilagus audubonii*
Javelina	*Pecari tajacu*
Kit fox	*Vulpes macrotis*
Mule deer	*Odocoileus hemionus*
Reptiles	
Common side-blotched lizard	*Uta stansburiana*
Western whiptail	*Aspidoscelis tigris*
Zebra-tailed lizard	*Callisaurus draconoides*
Plants	
Arizona pencil cholla	*Cylindropuntia arbuscula*
Bermuda grass	*Cynodon dactylon*
Big galleta	*Hilaria rigida*
Branched pencil cholla	*Cylindropuntia ramosissima*
Bush muhly	*Muhlenbergia porteri*
Catclaw acacia	*Acacia greggii*
Cheesebush	*Ambrosia salsola*
Christmas cholla	*Cylindropuntia leptocaulis*
Creosote bush	*Larrea tridentata*
Desert broom	*Baccharis sarothroides*
Desert fluff-grass	*Dasyochloa pulchella*
Desert globemallow	*Sphaeralcea ambigua*
Desert Thorn Apple	*Datura discolor*

Emory's crucifixion thorn	*Castela emoryi*
Fishhook barrel cactus	*Ferocactus wislizeni*
Graham's nipple cactus	*Mammillaria grahamii*
Kunze's cholla	*Grusonia kunzei*
Mexican paloverde	*Parkinsonia aculeata*
Mesquite mistletoe	*Phoradendron californicum*
Mojave milkweed	*Asclepias nyctaginifolia*
Ocotillo	*Fouquieria splendens*
Pale desert-thorn	*Lycium pallidum*
Pink-flower hedgehog cactus	*Echinocereus fendleri*
Russian thistle	*Salsola tragus*
Sacred datura	*Datura wrightii*
Saguaro	*Carnegiea gigantea*
Silver cholla	*Cylindropuntia echinocarpa*
Southwestern pipevine	*Aristolochia watsonii*
Tree cholla	*Cylindropuntia imbricata*
Velvet mesquite	*Neltuma velutina*
White bursage	*Ambrosia dumosa*
Woolly honeysweet	*Tidestromia lanuginosa*
[1]Tetra Tech, 2026a.	

Table D-2 **Amphibian Species[1]**	
Common Name	**Scientific Name**
Great Plains Toad	*Anaxyrus cognatus*
Arizona Toad	*Anaxyrus microscaphus*
Red-spotted Toad	*Anaxyrus punctatus*
Woodhouse's Toad	*Anaxyrus woodhousii*
Southwestern Woodhouse's Toad	*Anaxyrus woodhousii australis*
Sonoran Desert Toad	*Incilius alvarius*
Rio Grande Leopard Frog	*Rana berlandieri*
American Bullfrog	*Rana catesbeiana*
Lowland Leopard Frog	*Rana yavapaiensis*
Couch's Spadefoot	*Scaphiopus couchii*
[1]AGFD, 2026.	

Table D-3 Bird Species[1]	
Common Name	**Scientific name**
Sharp-shinned Hawk	*Accipiter striatus*
Clark's Grebe	*Aechmophorus clarkii*
Western Grebe	*Aechmophorus occidentalis*
White-throated Swift	*Aeronautes saxatalis*
Red-winged Blackbird	*Agelaius phoeniceus*
Black-throated Sparrow	*Amphispiza bilineata*
Mallard	*Anas platyrhynchos*
American Pipit	*Anthus rubescens*
Sandhill Crane	*Antigone canadensis*
Golden Eagle	*Aquila chrysaetos*
Black-chinned Hummingbird	*Archilochus alexandri*
Great Egret	*Ardea alba*
Great Blue Heron	*Ardea herodias*
Cattle Egret	*Ardea ibis*
Bell's Sparrow	*Artemisiospiza belli*
Long-eared Owl	*Asio otus*
Cooper's Hawk	*Astur cooperii*
Burrowing Owl	*Athene cunicularia*
Western Burrowing Owl	*Athene cunicularia hypugaea*
Verdin	*Auriparus flaviceps*
Least Bittern	*Botaurus exilis*
American Bittern	*Botaurus lentiginosus*
Great Horned Owl	*Bubo virginianus*
Red-tailed Hawk	*Buteo jamaicensis*
Ferruginous Hawk	*Buteo regalis*
Swainson's Hawk	*Buteo swainsoni*
Common Black Hawk	*Buteogallus anthracinus*
Green Heron	*Butorides virescens*
Western Sandpiper	*Calidris mauri*
Gambel's Quail	*Callipepla gambelii*
Anna's Hummingbird	*Calypte anna*
Costa's Hummingbird	*Calypte costae*
Cactus Wren	*Campylorhynchus brunneicapillus*
Wilson's Warbler	*Cardellina pusilla*
Northern Cardinal	*Cardinalis cardinalis*
Pyrrhuloxia	*Cardinalis sinuatus*
Turkey Vulture	*Cathartes aura*
Veery	*Catharus fuscescens*
Hermit Thrush	*Catharus guttatus*
Swainson's Thrush	*Catharus ustulatus*
Canyon Wren	*Catherpes mexicanus*
Vaux's Swift	*Chaetura vauxi*
Killdeer	*Charadrius vociferus*
Lark Sparrow	*Chondestes grammacus*
Lesser Nighthawk	*Chordeiles acutipennis*

Table D-3 Bird Species[1]	
Northern Harrier	*Circus hudsonius*
Marsh Wren	*Cistothorus palustris*
Yellow-billed Cuckoo (Western DPS)	*Coccyzus americanus*
Northern Flicker	*Colaptes auratus*
Gilded Flicker	*Colaptes chrysoides*
Inca Dove	*Columbina inca*
Common Ground Dove	*Columbina passerina*
Olive-sided Flycatcher	*Contopus cooperi*
Western Wood-Pewee	*Contopus sordidulus*
Ruby-crowned Kinglet	*Corthylio calendula*
Common Raven	*Corvus corax*
Ladder-backed Woodpecker	*Dryobates scalaris*
Snowy Egret	*Egretta thula*
White-tailed Kite	*Elanus leucurus*
Western Flycatcher	*Empidonax difficilis*
Hammond's Flycatcher	*Empidonax hammondii*
Least Flycatcher	*Empidonax minimus*
Dusky Flycatcher	*Empidonax oberholseri*
Southwestern Willow Flycatcher	*Empidonax traillii extimus*
Gray Flycatcher	*Empidonax wrightii*
Horned Lark	*Eremophila alpestris*
Prairie Falcon	*Falco mexicanus*
Peregrine Falcon	*Falco peregrinus*
American Peregrine Falcon	*Falco peregrinus anatum*
American Kestrel	*Falco sparverius*
American Coot	*Fulica americana*
Common Gallinule	*Gallinula galeata*
Greater Roadrunner	*Geococcyx californianus*
MacGillivray's Warbler	*Geothlypis tolmiei*
Common Yellowthroat	*Geothlypis trichas*
House Finch	*Haemorhous mexicanus*
Bald Eagle	*Haliaeetus leucocephalus*
Bald Eagle - Winter Population	*Haliaeetus leucocephalus (wintering pop.)*
Worm-eating Warbler	*Helmitheros vermivorum*
Black-necked Stilt	*Himantopus mexicanus*
Barn Swallow	*Hirundo rustica*
Caspian Tern	*Hydroprogne caspia*
Yellow-breasted Chat	*Icteria virens*
Bullock's Oriole	*Icterus bullockii*
Hooded Oriole	*Icterus cucullatus*
Scott's Oriole	*Icterus parisorum*
Dark-eyed Junco	*Junco hyemalis*
Loggerhead Shrike	*Lanius ludovicianus*
California Black Rail	*Laterallus jamaicensis coturniculus*
Orange-crowned Warbler	*Leiothlypis celata*
Lucy's Warbler	*Leiothlypis luciae*

Table D-3 Bird Species[1]	
Nashville Warbler	*Leiothlypis ruficapilla*
Virginia's Warbler	*Leiothlypis virginiae*
Gadwall	*Mareca strepera*
Gila Woodpecker	*Melanerpes uropygialis*
Lincoln's Sparrow	*Melospiza lincolnii*
Song Sparrow	*Melospiza melodia*
Abert's Towhee	*Melozone aberti*
Canyon Towhee	*Melozone fusca*
Elf Owl	*Micrathene whitneyi*
Northern Mockingbird	*Mimus polyglottos*
Black-and-white Warbler	*Mniotilta varia*
Brown-headed Cowbird	*Molothrus ater*
Ash-throated Flycatcher	*Myiarchus cinerascens*
Brown-crested Flycatcher	*Myiarchus tyrannulus*
Double-crested Cormorant	*Nannopterum auritum*
Neotropic Cormorant	*Nannopterum brasilianum*
Black-crowned Night Heron	*Nycticorax nycticorax*
Sage Thrasher	*Oreoscoptes montanus*
Northern Waterthrush	*Parkesia noveboracensis*
House Sparrow	*Passer domesticus*
Savannah Sparrow	*Passerculus sandwichensis*
Fox Sparrow	*Passerella iliaca*
Lazuli Bunting	*Passerina amoena*
Blue Grosbeak	*Passerina caerulea*
Painted Bunting	*Passerina ciris*
Indigo Bunting	*Passerina cyanea*
Phainopepla	*Phainopepla nitens*
Common Poorwill	*Phalaenoptilus nuttallii*
Red-necked Phalarope	*Phalaropus lobatus*
Black-headed Grosbeak	*Pheucticus melanocephalus*
Green-tailed Towhee	*Pipilo chlorurus*
Spotted Towhee	*Pipilo maculatus*
Western Tanager	*Piranga ludoviciana*
Summer Tanager	*Piranga rubra*
White-faced Ibis	*Plegadis chihi*
Pied-billed Grebe	*Podilymbus podiceps*
Blue-gray Gnatcatcher	*Polioptila caerulea*
Black-tailed Gnatcatcher	*Polioptila melanura*
Black-capped Gnatcatcher	*Polioptila nigriceps*
Vesper Sparrow	*Pooecetes gramineus*
Sora	*Porzana carolina*
Vermilion Flycatcher	*Pyrocephalus rubinus*
Great-tailed Grackle	*Quiscalus mexicanus*
Virginia Rail	*Rallus limicola*
Yuma Ridgway's Rail	*Rallus obsoletus yumanensis*
American Avocet	*Recurvirostra americana*

Table D-3 Bird Species[1]	
Rock Wren	*Salpinctes obsoletus*
Black Phoebe	*Sayornis nigricans*
Eastern Phoebe	*Sayornis phoebe*
Say's Phoebe	*Sayornis saya*
Calliope Hummingbird	*Selasphorus calliope*
Northern Parula	*Setophaga americana*
Hooded Warbler	*Setophaga citrina*
Yellow-rumped Warbler	*Setophaga coronata*
Black-throated Gray Warbler	*Setophaga nigrescens*
Hermit Warbler	*Setophaga occidentalis*
Chestnut-sided Warbler	*Setophaga pensylvanica*
Yellow Warbler	*Setophaga petechia*
American Redstart	*Setophaga ruticilla*
Townsend's Warbler	*Setophaga townsendi*
Mountain Bluebird	*Sialia currucoides*
Western Bluebird	*Sialia mexicana*
Red-breasted Nuthatch	*Sitta canadensis*
Cinnamon Teal	*Spatula cyanoptera*
Blue-winged Teal	*Spatula discors*
Red-naped Sapsucker	*Sphyrapicus nuchalis*
Lawrence's Goldfinch	*Spinus lawrencei*
Pine Siskin	*Spinus pinus*
Lesser Goldfinch	*Spinus psaltria*
Black-chinned Sparrow	*Spizella atrogularis*
Brewer's Sparrow	*Spizella breweri*
Chipping Sparrow	*Spizella passerina*
Northern Rough-winged Swallow	*Stelgidopteryx serripennis*
Eurasian Collared-Dove	*Streptopelia decaocto*
Western Meadowlark	*Sturnella neglecta*
European Starling	*Sturnus vulgaris*
Tree Swallow	*Tachycineta bicolor*
Bewick's Wren	*Thryomanes bewickii*
Bendire's Thrasher	*Toxostoma bendirei*
Crissal Thrasher	*Toxostoma crissale*
Curve-billed Thrasher	*Toxostoma curvirostre*
LeConte's Thrasher	*Toxostoma lecontei*
Willet	*Tringa semipalmata*
Northern House Wren	*Troglodytes aedon*
American Robin	*Turdus migratorius*
Western Kingbird	*Tyrannus verticalis*
Arizona Bell's Vireo	*Vireo bellii arizonae*
Cassin's Vireo	*Vireo cassinii*
Yellow-throated Vireo	*Vireo flavifrons*
Plumbeous Vireo	*Vireo plumbeus*
Western Warbling Vireo	*Vireo swainsoni*
Gray Vireo	*Vireo vicinior*

Table D-3 Bird Species[1]	
Yellow-headed Blackbird	*Xanthocephalus xanthocephalus*
White-winged Dove	*Zenaida asiatica*
Mourning Dove	*Zenaida macroura*
White-throated Sparrow	*Zonotrichia albicollis*
Golden-crowned Sparrow	*Zonotrichia atricapilla*
White-crowned Sparrow	*Zonotrichia leucophrys*

Table D-4 Invertebrate Species[1]	
Common Name	**Scientific Name**
Monarch	*Danaus plexippus*
Quagga Mussel	*Dreissena bugensis*
Virile Crayfish	*Faxonius virilis*
Red Swamp Crawfish	*Procambarus clarkii*
[1]AGFD, 2026.	

Table D-5 Mammal Species[1]	
Common Name	**Scientific Name**
Sonoran Pronghorn	*Antilocapra americana sonoriensis*
Pallid Bat	*Antrozous pallidus*
Coyote	*Canis latrans*
Bailey's Pocket Mouse	*Chaetodipus baileyi*
Rock Pocket Mouse	*Chaetodipus intermedius*
Sonoran Desert Pocket Mouse	*Chaetodipus penicillatus*
Pale Townsend's Big-eared Bat	*Corynorhinus townsendii pallescens*
Desert Kangaroo Rat	*Dipodomys deserti*
Merriam's Kangaroo Rat	*Dipodomys merriami*
Big Brown Bat	*Eptesicus fuscus*
Greater Western Bonneted Bat	*Eumops perotis californicus*
Hoary Bat	*Lasiurus cinereus*
Desert Red Bat	*Lasiurus frantzii*
Western Yellow Bat	*Lasiurus xanthinus*
Black-tailed Jackrabbit	*Lepus californicus*
California Leaf-nosed Bat	*Macrotus californicus*
House Mouse	*Mus musculus*
California Myotis	*Myotis californicus*
Arizona Myotis	*Myotis occultus*
Cave Myotis	*Myotis velifer*
Yuma Myotis	*Myotis yumanensis*
White-nosed Coati	*Nasua narica*
Western White-throated Woodrat	*Neotoma albigula*
Arizona Woodrat	*Neotoma devia*
Desert Woodrat	*Neotoma lepida*
Crawford's Desert Shrew	*Notiosorex crawfordi*
Pocketed Free-tailed Bat	*Nyctinomops femorosaccus*
Mule Deer	*Odocoileus hemionus*
Common Muskrat	*Ondatra zibethicus*
Southern Grasshopper Mouse	*Onychomys torridus*
Bighorn Sheep	*Ovis canadensis*
Mexican Desert Bighorn Sheep	*Ovis canadensis mexicana*
Desert Bighorn Sheep	*Ovis canadensis nelsoni*
Canyon Bat	*Parastrellus hesperus*
Arizona Pocket Mouse	*Perognathus amplus*
Little Pocket Mouse	*Perognathus longimembris*
Canyon Mouse	*Peromyscus crinitus*
Cactus Mouse	*Peromyscus eremicus*
Deer Mouse	*Peromyscus maniculatus*
Mountain Lion	*Puma concolor*

Table D-5 Mammal Species[1]	
Western Harvest Mouse	*Reithrodontomys megalotis*
Arizona Cotton Rat	*Sigmodon arizonae*
Colorado River Cotton Rat	*Sigmodon arizonae plenus*
Desert Cottontail	*Sylvilagus audubonii*
Brazilian Free-tailed Bat	*Tadarida brasiliensis*
Botta's Pocket Gopher	*Thomomys bottae*
Kit Fox	*Vulpes macrotis*
Round-tailed Ground Squirrel	*Xerospermophilus tereticaudus*
[1]AGFD, 2026.	

Table D-6 Plant Species1	
Common Name	**Scientific Name**
White-stem Milkweed	*Asclepias albicans*
Spider Milkweed	*Asclepias asperula*
Desert Milkweed	*Asclepias erosa*
Mojave Milkweed	*Asclepias nyctaginifolia*
Sand Flat Milk-vetch	*Astragalus insularis*
Sand Flat Milk-vetch	*Astragalus insularis var. harwoodii*
Mojave Desert Suncup	*Camissonia campestris*
Miniature Suncup	*Camissoniopsis micrantha*
California Indian Paintbrush	*Castilleja stenantha*
Golden Suncup	*Chylismia brevipes ssp. brevipes*
Pallid Suncup	*Chylismia brevipes ssp. pallidula*
Mohave Thistle	*Cirsium mohavense*
Las Animas Nakedwood	*Colubrina californica*
Desert Dodder	*Cuscuta denticulata*
Golden Cholla	*Cylindropuntia echinocarpa*
Utah Swallowwort	*Cynanchum utahense*
Bigelow's Tansy-aster	*Dieteria bigelovii var. bigelovii*
Johnson's Fishhook Cactus	*Echinomastus johnsonii*
Death Valley Mormon Tea	*Ephedra funerea*
Jointed Rush	*Juncus articulatus*
Desert Tansy-aster	*Leucosyris arida*
Varied Fishhook Cactus	*Mammillaria viridiflora*
Dune Blazingstar	*Mentzelia longiloba var. longiloba*
Woolly Heads	*Nemacaulis denudata*
Cleftleaf Wildheliotrope	*Phacelia crenulata var. crenulata*
Scaly Sandplant	*Pholisma arenarium*
Velvet Brittle-stem	*Psathyrotes ramosissima*
California Sage	*Salvia columbariae*
Small Wirelettuce	*Stephanomeria exigua ssp. exigua*
Linearleaf Sand Spurge	*Stillingia linearifolia*
Spiny Sand Spurge	*Stillingia spinulosa*
Hall Shrub Spurge	*Tetracoccus fasciculatus var. hallii*
[1]AGFD, 2026.	

Table D-7 Reptile Species[1]	
Common Name	**Scientific Name**
Spiny Softshell	*Apalone spinifera*
Glossy Snake	*Arizona elegans*
Desert Glossy Snake	*Arizona elegans eburnata*
Tiger Whiptail	*Aspidoscelis tigris*
Zebra-tailed Lizard	*Callisaurus draconoides*
Snapping Turtle	*Chelydra serpentina*
Resplendent Shovel-nosed Snake	*Chionactis annulata*
Western Shovel-nosed Snake	*Chionactis occipitalis*
Western Banded Gecko	*Coleonyx variegatus*
Western Diamond-backed Rattlesnake	*Crotalus atrox*
Sidewinder	*Crotalus cerastes*
Mohave Desert Sidewinder	*Crotalus cerastes cerastes*
Sonoran Sidewinder	*Crotalus cerastes cercobombus*
Colorado Desert Sidewinder	*Crotalus cerastes laterorepens*
Black-tailed Rattlesnake	*Crotalus molossus*
Southwestern Speckled Rattlesnake	*Crotalus pyrrhus*
Mohave Rattlesnake	*Crotalus scutulatus*
Tiger Rattlesnake	*Crotalus tigris*
Great Basin Collared Lizard	*Crotaphytus bicinctores*
Eastern Collared Lizard	*Crotaphytus collaris*
Sonoran Collared Lizard	*Crotaphytus nebrius*
Ring-necked Snake	*Diadophis punctatus*
Desert Iguana	*Dipsosaurus dorsalis*
Long-nosed Leopard Lizard	*Gambelia wislizenii*
Sonoran Desert Tortoise	*Gopherus morafkai*
Gila Monster	*Heloderma suspectum*
Mediterranean Gecko	*Hemidactylus turcicus*
Desert Nightsnake	*Hypsiglena chlorophaea*
Sonoran Nightsnake	*Hypsiglena chlorophaea chlorophaea*
California Kingsnake	*Lampropeltis californiae*
Eastern Kingsnake	*Lampropeltis getula*
Rosy Boa	*Lichanura roseofusca*
Coachwhip	*Masticophis flagellum*
Red Racer	*Masticophis flagellum piceus*
Striped Whipsnake	*Masticophis taeniatus*
Sonoran Coralsnake	*Micruroides euryxanthus*
Desert Horned Lizard	*Phrynosoma platyrhinos*
Regal Horned Lizard	*Phrynosoma solare*
Spotted Leaf-nosed Snake	*Phyllorhynchus decurtatus*
Gophersnake	*Pituophis catenifer*
Sonoran Gophersnake	*Pituophis catenifer affinis*

Table D-7 Reptile Species[1]	
Western Red-tailed Skink	*Plestiodon gilberti rubricaudatus*
Long-nosed Snake	*Rhinocheilus lecontei*
Western Patch-nosed Snake	*Salvadora hexalepis*
Desert Patch-nosed Snake	*Salvadora hexalepis hexalepis*
Common Chuckwalla	*Sauromalus ater*
Desert Spiny Lizard	*Sceloporus magister*
Western Groundsnake	*Sonora semiannulata*
Northern Mexican Gartersnake	*Thamnophis eques megalops*
Sonoran Lyresnake	*Trimorphodon lambda*
Mohave Fringe-toed Lizard	*Uma scoparia*
Long-tailed Brush Lizard	*Urosaurus graciosus*
Arizona Long-tailed Brush Lizard	*Urosaurus graciosus shannoni*
Ornate Tree Lizard	*Urosaurus ornatus*
Schott's Tree Lizard	*Urosaurus ornatus schottii*
Common Side-blotched Lizard	*Uta stansburiana*
Western Side-blotched Lizard	*Uta stansburiana elegans*
Schott's Tree Lizard	*Urosaurus ornatus schottii*
[1]AGFD, 2026.	

EXHIBIT E
SCENIC AREAS, HISTORIC SITES AND STRUCTURES, ARCHAEOLOGICAL SITES

In accordance with Arizona Corporation Commission Rules of Practice and Procedure R14-3-219, the Applicant provides the following information:

Describe any existing scenic areas, historic sites and structures or archaeological sites in the vicinity of the proposed facilities and state the effects, if any, the proposed facilities will have thereon.

Visual Resources

Sensitive Viewpoints

Sensitive viewpoints consist of locations from which a significant number of individuals having some regard for the integrity of visual resources would view a landscape and be exposed to the presence of the proposed Project. There are no designated scenic areas in the vicinity of the Project site. Potential sensitive viewpoints in the Project area occur along transportation corridors, and from residential areas near the Project.

Viewer sensitivity is based on the importance of features, conditions that affect visual perception, and social factors that contribute to view perception. The levels of sensitivity are generally classified as low, moderate, or high depending on viewer types and exposure, view orientation and duration, and viewer awareness or sensitivity to visual changes.

Visual quality is the visual pattern created by the combination of natural character landscapes and industrial and artificial features. Visual quality is typically evaluated using the following descriptions:

- Natural – the landscape exhibits distinctive and memorable natural visual features (landforms, rock outcrops, etc.) and patterns (vegetation/open space) that are largely undisturbed, usually a rural or open space setting. Few human-made developments or disturbances are present.
- Rural – the landscape consists of natural and human-made features/patterns, often the result of altering the landscape for farming or mineral extraction. These areas may not be visually distinct or unusual in the region.
- Mixed Residential and Commercial – the landscape is primarily human-made and affected by elements common to the built environment of mixed residential, commercial, and industrial areas. Human elements are prevalent, and landscape modifications exist which do not compatibly blend with the natural surroundings.

Existing Conditions

Six key viewpoints, or Key Observation Points (KOPs), were selected in the vicinity of the Project

area to provide the most wholly representative and illustrative views of the potential visual impacts of the Project. The KOPs were selected based on where there is public sensitivity to visual change from the Project. These views are from the closest residential areas and along nearby transportation corridors. Photos were taken during field reconnaissance in August 2025. **Figure E-1** shows the locations and viewing angles of the six KOPs. A rendering of the Project is also included in **Exhibit G**. The existing conditions and the potential visual effects of the proposed Project components for the KOPs and rendering are illustrated in **Figures E-2** through **E-7.**

KOP 1 (Figure E-2) Alamo Road – Looking East

KOP 1 was taken along Alamo Road west of the Proposed Gen-Tie looking east towards the Project. KOP 1 represents the view from the closest access road to the north of the Project. The existing view shows the edge of the gravel road and vegetation in the foreground, vegetation including shrubs and cactus in the middle ground. In the distant background, the Harquahala Mountains are visible towards the southeast in the right side of the existing view. The visual quality of the view is classified as vacant and rural, with vegetated vacant land use dominating the view.

KOP 2 (Figure E-3) Urea Ranch Road – Looking North Northwest

KOP 2 was taken along Urea Ranch Road looking northwest towards the Project. KOP 2 represents the view from main thoroughfare in proximity to the south of the Project. The existing view shows the edge of the dirt shoulder, a barbed wire fence, and vegetation including grass and an agricultural field in the foreground, vegetated vacant and cleared land in the middle ground, and the Harcuvar Mountains in the background. The visual quality of the view is classified as rural, with agricultural and vacant land dominating the view.

KOP 3 (Figure E-4) US Highway 60 & Morenga Palms RV Resort – Looking North Northwest

KOP 3 was taken along US Highway 60 looking north towards the Project. KOP 3 represents the view from the closest major transportation corridor, and from the Morenga Palms RV Resort. The existing view shows the paved edge of US Highway 60 and existing desert vegetation including shrubs in the foreground, the Morenga Palms RV Resort, a distribution line with wooden poles approximately 30 to 40 feet in height, and vegetation including shrubs and bushes in the middle ground, and vegetation, agricultural use including a farm shed and associated equipment and a metal fence in the background, with the Harcuvar Mountains visible in the distant background. There is also an existing distribution line visible parallel to US Highway 60 in the foreground. In the distant background, the existing Harcuvar Substation is also visible. The visual quality of the view is classified as rural and mixed utility and residential in character. Vegetated vacant land dominates the far view.

KOP 4 (Figure E-5) Fir Avenue & Fourth Street, Wenden – Looking Northeast

KOP 4 was taken at the corner of Fir Avenue and Fourth Street looking northeast towards the Project. KOP 4 represents the view from residences in the nearest populated area in the unincorporated community of Wenden, Arizona. The existing view shows vegetation including grass and shrubs in the foreground, vegetation, existing metal distribution structures and

infrastructure in the middle ground, and the Harcuvar Mountains in the background. The visual quality of the view is classified as rural with limited utility in character. Vegetated vacant land dominates the view.

KOP 5 (Figure E-6) Alamo Road, Wenden – Looking Northeast

KOP 5 was taken on Alamo Road in Wenden, looking northeast towards the Project. KOP 5 represents the view of northbound travelers on a nearby main road in the unincorporated community of Wenden. The existing view shows Alamo Road and disturbed land, including dirt, grass, and shrubs in the foreground, agricultural infrastructure and existing distribution structures in the middle ground, agricultural infrastructure and vegetation including grass and shrubs in the background, and the Harcuvar Mountains in the far background. The visual quality of the view is classified as rural and mixed utility in character.

KOP 6 (Figure E-7) Al Dahra Farms – Looking Northeast

KOP 6 was taken from the Al Dahra Farms property, a farm on Alamo Road, looking northeast towards the Project. KOP 6 represents the view from a nearby agricultural production company with residences onsite, which is the nearest residence to the Project. The existing view shows a dirt road and sparse vegetation in the foreground, and a fence and vegetation, including bushes, trees, and shrubs in the middle ground, which block the background and far background. The Harcuvar Mountains are to the northeast, visible in the far right of the view. The visual quality of the view is classified as rural in character.

Potential Effects

Potential effects to visual resources relate to changes in available views of the landscape and the effects of those changes on viewers. Potential effects were evaluated based on a combination of contrasts between levels of visual quality and the levels of viewer sensitivity.

Visual resources would be affected by introducing the Project into the existing visual landscape. The structures associated with the Project include the Thermal Plant, which would consist of up to 17 combustion turbine generators (CTGs) and an approximately 6.1-mile 230 kV transmission Gen-Tie, of which 1.8 miles is already certificated under Case No. 236 and 4.3 miles are considered jurisdictional to the CEC. The associated Energy Center consists of the Project components as well as an up to 400 MW, approximately 2,500-acre Solar Facility and BESS. The effects of introducing these elements into the landscape would be apparent when viewed from sensitive viewpoints. The Project would introduce new elements into the landscape; however, they would not appreciably alter the existing form, line, color, and texture which characterize the existing landscape and are consistent with the existing infrastructure and land uses in the area.

Visual simulations, which provide a view of the Project, were prepared for the six KOPs. Visual effects associated with each of the KOPs are described below and shown in **Figures E-2** through **E-7** (visual simulations). These simulations show the proposed views from the KOPs after construction of the Project.

KOP 1 (Figure E-2) Alamo Road – Looking East

KOP 1 was taken along Alamo Road west of the Proposed Gen-Tie looking east towards the Project. KOP 1 shows the existing conditions and a simulation of the Proposed Gen-Tie in the background. This represents a view from which a motorist on Alamo Road could see the Proposed Gen-Tie, which would be temporary in nature. While the Project introduces proposed 230 kV transmission structures into the viewshed, the structures are primarily obscured by topography and existing vegetation from this viewpoint and the top of the structures would be barely visible. The Project Gen-Tie structures would not substantially alter the visual landscape due to the topography, vegetation of the surrounding area and the duration of the viewer.

KOP 2 (Figure E-3) Urea Ranch Road – Looking North Northwest

KOP 2 was taken along Urea Ranch Road looking northwest towards the Project. KOP 2 shows the existing conditions and a simulation of the Project in the middle and background of the view. This represents a view from which a motorist on Urea Ranch Road could see the proposed Project, whose viewpoint would be temporary in nature. While the Project will introduce proposed 230 kV transmission structures and CTGs associated with the Thermal Plant, the view would not substantially alter the visual landscape due to the viewing distance, the speed at which one is traveling and the surrounding topography.

KOP 3 (Figure E-4) US Highway 60 & Morenga Palms RV Resort – Looking North Northwest

KOP 3 was taken along US Highway 60 looking north towards the Project. KOP 3 shows the existing conditions and a simulation of the Project in the middle and background of the view. This represents a view from the Morenga Palms RV Resort or a motorist on US Highway 60. The motorists on US Highway 60 would be traveling at high speeds and the viewpoint would be temporary in nature. The Project introduces proposed 230 kV transmission structures and Thermal Plant into the viewshed and the Project components are visible from this view. The view would not substantially alter the visual landscape due to the viewing distance and the surrounding topography. Perceptible visual contrast would be moderate from this viewshed depending on the viewer and duration.

KOP 4 (Figure E-5) Fir Avenue & Fourth Street, Wenden – Looking Northeast

KOP 4 was taken at the corner of Fir Avenue and Fourth Street looking northeast towards the Project. KOP 4 shows the existing conditions and a simulation of the Project in the background. This represents a view from the closest residential area to the Project. While the Project introduces proposed 230 kV transmission structures and the Thermal Plant into the viewshed, it would not substantially alter the visual landscape due to the presence of existing distribution and high voltage transmission lines, vegetation, and the topography of the surrounding area.

KOP 5 (Figure E-6) Alamo Road, Wenden – Looking Northeast

KOP 5 was taken on Alamo Road in Wenden, looking northeast towards the Project. KOP 5 shows the existing conditions and a simulation of the Project in the background. This represents a view

from a motorist on Alamo Road, whose view would be temporary in nature. While the Project introduces proposed 230 kV transmission structures and the Thermal Plant into the viewshed, it would not substantially alter the visual landscape due to the presence of existing metal distribution structures and overhead lines, vegetation, topography of the surrounding area, and duration of the viewer. The Project would not substantially alter the viewshed from this viewing location.

KOP 6 (Figure E-7) Al Dahra Farms – Looking Northeast

KOP 6 was taken on Al Dahra Farms, a farm with a residence on Alamo Road, looking northeast towards the Project. KOP 6 represents the view from the closest residence to the Project. KOP 6 shows the existing conditions and a simulation; however, the Project structures would be completely obstructed by the existing vegetation. The Project would not alter the existing viewshed from KOP 6.

Historic and Archaeological Resources

Cultural Context

The following cultural context was adapted from the Cultural Resources Memo for the Eagle Eye Energy Center and Gen-Tie Project, La Paz County, Arizona, prepared in May 2026 by Tetra Tech for the Applicant (attached as **Exhibit E-1 with non-public information redacted)**. The memorandum summarizes the results of three Class III Cultural Resources Survey reports that cover ASLD land, private land, and Bureau of Land Management (BLM) land. All references are included in the Cultural Resources Memo (Tetra Tech, 2026).

Cultural Setting

A general understanding of the history of human occupation in southwestern Arizona (Study Area) is necessary to interpret prehistoric and historic cultural resources documented as part of this Project. Human habitation in the Study Area spans more than 11,500 years (Cordell and McBrinn 2012), although evidence for such early occupation is sparse in the Project vicinity. Indigenous foragers and agriculturalists living in the Project and surrounding Study Area would have had easy access to the various local flora and fauna ecozones, as well as those in the Harcuvar and Harquahala Mountains and the McMullen Valley. Nearby Vulture Mountain obsidian would also have been an attractive resource. As stated by Park and colleagues (2012:41), it is “doubtful that [historic] agriculture would have had as significant an impact [in the Study Area] without the river water resources available.” With this in mind, the Colorado River is approximately 55 miles to the west, the Gila River is 65 miles to the south, the Bill Williams River is 20 miles to the north, and the ephemeral Centennial Wash is one mile to the south.

A common, yet enigmatic, site type encountered in La Paz County in general, and the Study Area specifically, consists of rocks and little else. Depending on the specifics of the feature, this site type can be described as rock clusters, rock piles, or low stone alignments. The occurrence of this site type is probably the result of the geography and resource potential of the landscape, rather than a specific time period or cultural group. These features are probably associated with Indigenous temporary camps or hunting activities (Fish et al. 1992). Hunting activities were common to all the prehistoric, protohistoric, and historic Indigenous groups affiliated with the region (Castetter

et al. 1938; Fish et al. 1985; Hodgson et al. 2018; Houghten 2019). Additionally, various Indigenous groups moved through the region as part of their trade routes. Numerous prehistoric trails have been documented between the Gila and Colorado Rivers, which are associated with rock cairns and ceramic scatters. For example, the Halchidhoma Trail followed Centennial and Bouse washes via Granite Wash Pass near Salome and was likely used by various groups over the centuries (Schroeder 1961, 1979).

Previous Research

A cultural resources records and literature review was conducted for the Project. The purpose of the investigation was to identify previously conducted investigations, previously recorded cultural resources, which may include archaeological sites (prehistoric or historic), structures, buildings, landscapes, districts, or objects for their respective eligibility for listing on the National Register of Historic Places (NRHP) within the Project footprint.

Previous Cultural Resources Surveys

The records check and literature review revealed that 10 investigations have been conducted within one mile of the Project. None of the 10 investigations intersect with the Project footprint (**Table E-1**).

Tetra Tech staff conducted a records search using the AZSITE database, which includes records of previous archaeological investigations and previously documented cultural resources (prehistoric, historic archaeological sites, and historic architectural resources). GIS shapefiles of previous investigations and documented cultural resources in the Study Area were downloaded on March 15, 2024, and on August 8, 2025. Additional records from the Arizona State Museum (ASM) Archaeological Records Office (ARO) were obtained on March 26, 2024, and August 28, 2025. An in-person BLM records search was conducted on March 13, 2024. This information was supplemented with a review of the National Park Service (NPS) online database (NPS 2026) of properties listed in the National Register of Historic Properties (NRHP) and the Arizona Register of Historic Places (ARHP). Tetra Tech also reviewed historic Arizona General Land Office (BLM 2026) records to determine whether vestiges of trails, transportation routes, homesteads, or other potential historic resources were present in the Project Area. The records search indicates that there have been 14 previous cultural resources investigations between 1979 and 2018 within the Study Area. None of these previous surveys overlap with the Project Area.

Table E-1. Previously Conducted Surveys in the Study Area

Activity No.	Project Name	Author(s)	Year
1979-126.ASM	Bouse Hills-Harcuvar-Little Harquahala 115 kV Transmission Line	No Data	1979
1994-202.ASM	Cultural Resource Studies for the North-South Transfer Pipeline, West-Central Arizona: Class I Survey. Dames & Moore Intermountain Cultural Resource Series Research Paper 16A. Phoenix, Arizona.	Rogge, A.E., David Boylan, and Glenn P. Darrington	1994

Table E-1. Previously Conducted Surveys in the Study Area			
Activity No.	**Project Name**	**Author(s)**	**Year**
1997-194.ASM	Archaeological Assessment of Arizona Public Service Company's Proposed 12 kV Power Line Extension Near Harcuvar Substation, La Paz County, Arizona. Archaeological Consulting Services Project 97-45. Tempe, Arizona.	Adams, Kim	1997
2001-450.ASM	Wickenburg Road	No Data	No Data
2003-246.ASM	A Class III Cultural Resources Survey of the Electric Lightwave, Inc. Southwest Fibernet Project Fiber Optic Line Right-of-Way From Las Vegas, Nevada to Phoenix, Arizona: The Arizona Segment	Foster, Michael S., Annick Lascaux, and Dale R. Gerken	2003
2003-318.ASM	Electric Lightwave Right-of-Way Survey	No Data	2006
2004-807.ASM	Cultural Resources Survey of the Bonanza Mine Extension Line, La Paz County, Arizona. Archaeological Consulting Services, Ltd. ACS Project # 02-031-02A. Tempe, Arizona.	Gage, Gina S.	2002
2005 1306.ASM	A Cultural Resources Survey of Proposed Construction Sites along El Paso Natural Gas Line 1104 (Wenden to Franconia Junction) in La Paz and Mohave Counties, Arizona. SWCA Environmental Consultants. Cultural Resources Report No. 06-01. Tucson, Arizona.	Levstik, Jennifer, and Jerome S. Hesse	2006
2009-278.ASM	An Archaeological Survey of the Proposed Cathodic Protection Station No. 2035 along EPNG line 1104, La Paz County, Arizona. SWCA Cultural Resources Report No. 08-289. SWCA Environmental Consultants, Tucson, Arizona.	Barr, David M.R., and S. Jerome Hesse	2008
2016-357.ASM	A Cultural Resource Survey of 2.65 Miles along 2nd Street/Alamo Road in Wenden, North of US Highway 60 at Milepost 61.50, La Paz County, Arizona. AZTEC Report No. AZ16-10. AZTEC Engineering Group, Phoenix, Arizona.	Bowler, Maggie R., and Scott Solliday	2016
2018 0252.ASM	Class III Cultural Resources Inventory for the Harcuvar-Little Harquahala Pumping Plant and Bouse Hills Pumping Plant Harcuvar 115kV Transmission Line Repair Project, La Paz County, Arizona.	Wygant, Lindsay, and Jonathan Knighton-Wisor	2018
94-15.BLMH	No Data	No Data	No

Table E-1. Previously Conducted Surveys in the Study Area			
Activity No.	**Project Name**	**Author(s)**	**Year**
			Data
98-5.BLMH	No Data	No Data	No Data
06-42.BLM	No Data	No Data	No Data
ASM=Arizona State Museum; BLM/BLMH=Bureau of Land Management			

Previously Recorded Archaeological Sites

The review identified 11 archaeological sites within the Study Area, none of which are within the Project Area (see **Table E-2**). Previously documented sites in the Study Area include three prehistoric sites (an artifact scatter, a site with a boulder shelter and pictograph panel, and a site with a feature and associated artifacts), seven historic sites (the Arizona and California Railway, three unimproved roads, the Arizona Public Service transmission line, and two trash scatters), and one multicomponent (prehistoric and historic) site with grinding slicks, a trail, and stone circle). One site, the Arizona and California Railway, has been determined eligible individually for listing in the NRHP; one site has been recommended eligible; two sites are not evaluated for listing in the NRHP; three sites have been determined ineligible individually; and four sites are recommended ineligible individually.

Table E-2. Previously Recorded Archaeological Sites in the Study Area			
Site Number	**Time Period**	**Site Type**	**NRHP Eligibility Status**
AZ R:4:16(ASM)	Historic	Arizona and California Railway	Eligible Individually (multiple SHPO numbers)
AZ S:2:3(ASM)	Multicomponent	Grinding Slicks, Trail, and Stone Circle	Recommended Ineligible
AZ S:2:4(ASM)	Prehistoric	Boulder Shelter, Pictograph Panel	Recommended Eligible
AZ S:2:20(ASM)	Historic	Trash Scatter	Ineligible Individually (SHPO-2001-2944)
AZ S:2:21(ASM)	Prehistoric	Feature and Associated Artifacts	Ineligible Individually (SHPO-2001-2944)
AZ S:2:25(ASM)	Historic	Arizona Public Service Powerline	Recommended Ineligible
AZ S:2:26(ASM)	Historic	Unimproved Road	Recommended Ineligible
AZ S:2:27(ASM)	Historic	Unimproved Road	Recommended Not Evaluated
AZ S:2:28(ASM)	Historic	Unimproved Road	Ineligible Individually (SHPO-2016-1234)

Table E-2. Previously Recorded Archaeological Sites in the Study Area			
Site Number	**Time Period**	**Site Type**	**NRHP Eligibility Status**
AZ S:2:29(ASM)	Historic	Trash Scatter	Recommended Ineligible
AZ T:3:6(ASM)	Prehistoric	Artifact Scatter	Not Evaluated (SHPO-2024-0092)
ASM = Arizona State Museum; NRHP = National Register of Historic Places			

Project Area Survey Results

The Applicant previously commissioned surveys that include the entire Project Area. Tetra Tech conducted three cultural resources surveys for other projects that in total covered the entirety of the proposed Project Area (see Figures 1 and 2 in **Exhibit E-1**). First, Tetra Tech conducted a Class III cultural resources inventory for a proposed energy center on BLM-administered land (Byszewski et al. 2025) that covered approximately 379 acres of the proposed T-line corridor. Second, Tetra Tech conducted a Class III cultural resources inventory for a proposed energy center on ASLD-administered land (Huntley and Turney 2026a) that covered approximately 289 acres of the proposed T-line corridor. Finally, Tetra Tech conducted a due diligence cultural resources inventory for a proposed energy center on private land (Huntley and Turney 2026b) that covered approximately 159 acres of the Proposed Gen-tie corridor, all of the Thermal Plant, and all of the proposed buffers.

The pedestrian surveys documented no archaeological sites and documented 24 isolated finds. Per the ASM Archaeological Site Recording Manual (ASM 1993), an isolated feature is defined as a feature that does not have any other features within 100 meters. An isolated occurrence is defined as a single artifact or small group of artifacts that does not meet the criteria for sites described above. In accordance with ASM's Policy and Procedures Regarding Historical-Period Waste Piles (ASM 2021) and as directed by the BLM Lake Havasu Field Office, concentrations of mass-produced, historical-period artifacts were recorded as isolated finds.

Two types of isolates were recorded. The majority (21 or 88 percent) of isolated finds in the Project Area are historic. These are either single artifacts or groups of artifacts. They tend to date from the Late Historic Period (A.D. 1900-1950) through recent times. Two artifacts are prehistoric. These are a complete, Ventana side notched, jasper projectile point (BN2-JS-IF-02) that dates between about 5,000 and 3,800 B.C. (Justice 2002) and a tertiary red chert flake (BN2-JS-IF-52) of unknown time period. Finally, a Tizon Brown Ware jar/olla body sherd (BN2-JS-IF-60) has a manufacturing date that spans the prehistoric and protohistoric periods (ca. A.D.700-A.D.-1890) (NAU 2001). The isolates indicate a range of activities, including prehistoric hunting and possible food preparation or resource procurement, as well as historic food consumption and refuse dumping. Tetra Tech recommended that all 24 isolates observed during Project Area surveys are not eligible for listing in the NRHP.

Tribal Outreach

Consultation letters and the Cultural Resources Memo were sent to local Native American Tribes and SHPO on May 12, 2025. The letters and responses from the tribes are included in **Exhibit E-**

2. The Applicant obtained the list of Tribes with claims in the Project area by consulting the SHPO Government-to-Government Consultation Toolkit. The following Tribes were sent consultation letters: the Ak-Chin Indian Community, the Chemehuevi Indian Tribe, the Colorado River Indian Tribes, Fort McDowell Yavapai Nation, the Fort Mojave Indian Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai Apache Nation, and the Yavapai Prescott Indian Tribe. Tribal consultation letters and correspondence sent are included in **Exhibit E-2**.

Response letters or request for meetings from the tribes have been included at the end of **Exhibit E-2**. Specifically, the Chemehuevi Indian Tribe responded and requested a meeting to would like to better understand this area location for the Project (**Exhibit E-2**). BrightNight held a call with the Chemehuevi Tribal Historic Preservation Office (THPO) to discuss the Project and answer initial questions from the Tribe on May 19, 2026.

Project Effects

Potential effects applicable to the Project include physical destruction of or damage to all or part of the property; change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; as well as introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features. Effects on cultural resources are normally considered permanent, as these resources are finite and disturbance of them, particularly archaeological sites, cannot be reversed. However, effects on historic landscapes or the viewsheds of historic or other significant areas can be temporary if projects do not permanently impact associated resources and are removed at a future date.

Because surveys of the Project Area did not identify any recommended-eligible resources, no adverse effects to cultural resources are expected.

Recommendations

Tetra Tech submits that thorough in-field documentation of the 24 isolates has exhausted their information potential (Criterion D) and that they are not eligible for listing in the NRHP under any of the other eligibility criteria. Thus, no additional management recommendations are necessary. The ASLD, BLM, and SHPO have concurred with these recommendations.

The Arizona Antiquities Act, A.R.S. §41-865, et seq., protects burials and funerary items on private land in Arizona. Tetra Tech recommends developing an Unanticipated Discovery Plan prior to the commencement of any ground disturbing activities for the Project. The Unanticipated Discovery Plan would outline procedures to be followed in the event cultural materials or human remains are inadvertently discovered during construction activities. If human remains are encountered during construction, all work would cease within 100 feet of the discovery, and the SHPO, ASM, local law enforcement agency, and Office of the Medical Investigator must be notified.

For most cultural resources, the greatest potential for adverse impacts is from ground disturbing

activities directly associated with Project construction. For the Project, ground disturbance would occur within the Project footprint. Appropriate mitigation measures would be developed in consultation with the appropriate land managing agencies, including SHPO, and interested Tribes. Mitigation measures could include flagging or fencing of sites during construction. Other mitigation measures could include site testing and excavation.

While it is unlikely that unanticipated discoveries of archaeological, paleontological, or historical sites, human remains, funerary objects, sacred ceremonial objects or objects of national or tribal patrimony would occur during construction or operation of Project facilities, it is nonetheless possible. Unanticipated discoveries of such materials on state, county, or municipal lands are subject to A.R.S. § 41-844. For unanticipated discoveries of human remains or funerary objects on private lands, the Applicant would comply with the protocols set forth in A.R.S. § 41-865. If unanticipated discoveries are made in connection with construction activities, the Project would immediately suspend all operations in the vicinity of the find and would not resume until the discovery is appropriately treated and authorization is given by the appropriate agency.

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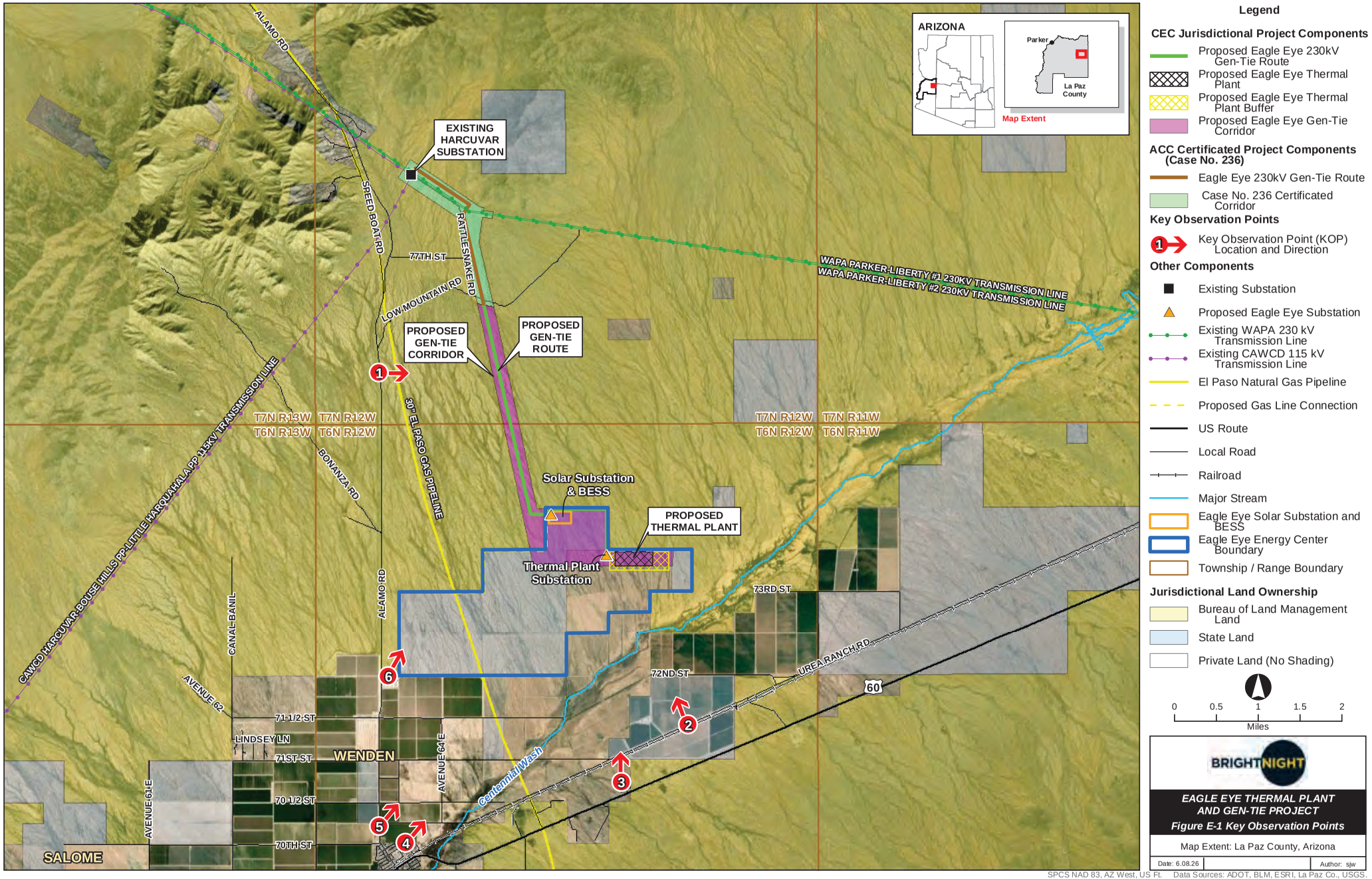

ARIZONA
Parker
La Paz County
Map Extent
EXISTING HARCUVAR SUBSTATION
PROPOSED GEN-TIE CORRIDOR
PROPOSED GEN-TIE ROUTE
Solar Substation & BESS
PROPOSED THERMAL PLANT
Thermal Plant Substation
WAPA PARKER-LIBERTY #1 230KV TRANSMISSION LINE
WAPA PARKER-LIBERTY #2 230KV TRANSMISSION LINE
CAWCD HARCUVAR-BOUSE HILLS PP-LITTLE HARQUAHALA PP 115KV TRANSMISSION LINE
30" EL PASO GAS PIPELINE
ALAMO RD
SPEED BOAT RD
RATTLESNAKE RD
LOW MOUNTAIN RD
BONANZA RD
CANAL BANK
AVENUE 62
AVENUE 61 E
AVENUE 64 E
77TH ST
73RD ST
72ND ST
71 1/2 ST
71ST ST
70 1/2 ST
70TH ST
LINDSEY LN
UREA RANCH RD
60
WENDEN
SALOME
Centennial Wash
T7N R13W T7N R12W
T6N R13W T6N R12W
T7N R12W T7N R11W
T6N R12W T6N R11W
1
2
3
4
5
6
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
ACC Certificated Project Components (Case No. 236)
Eagle Eye 230kV Gen-Tie Route
Case No. 236 Certificated Corridor
Key Observation Points
Key Observation Point (KOP) Location and Direction
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 E-1 Key Observation Points
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.

KOP 1 (Figure E-2)
Alamo Road – Looking East

This simulation is for graphic representation only, and exact structure types and locations have not been determined.

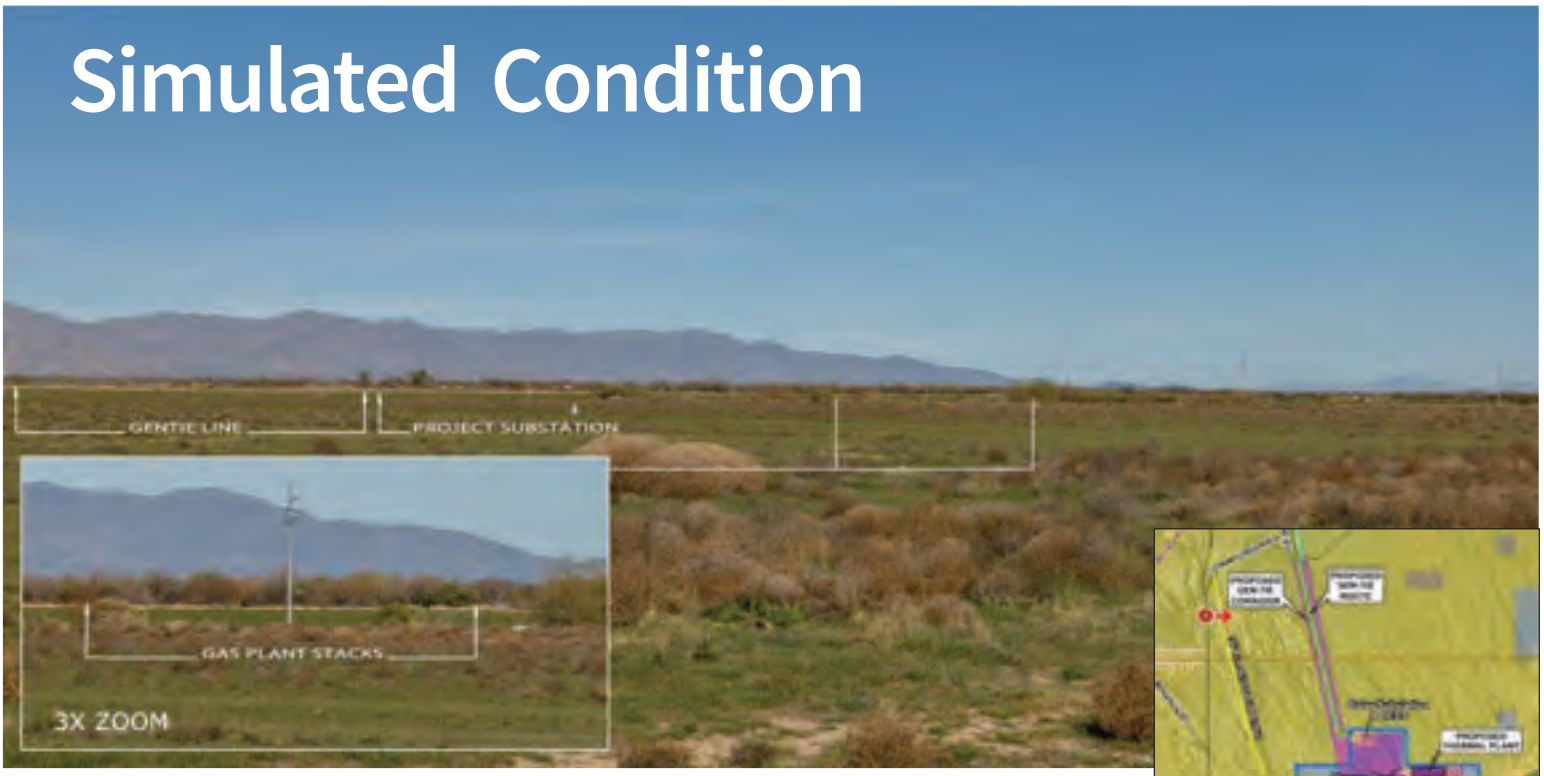
KOP 2 (Figure E-3)
Urea Ranch Road – Looking North/ Northwest

This simulation is for graphic representation only, and exact structure types and locations have not been determined.

KOP 3 (Figure E-4)
US highway 60 & Morenga Palms RV Resort – Looking North/Northwest

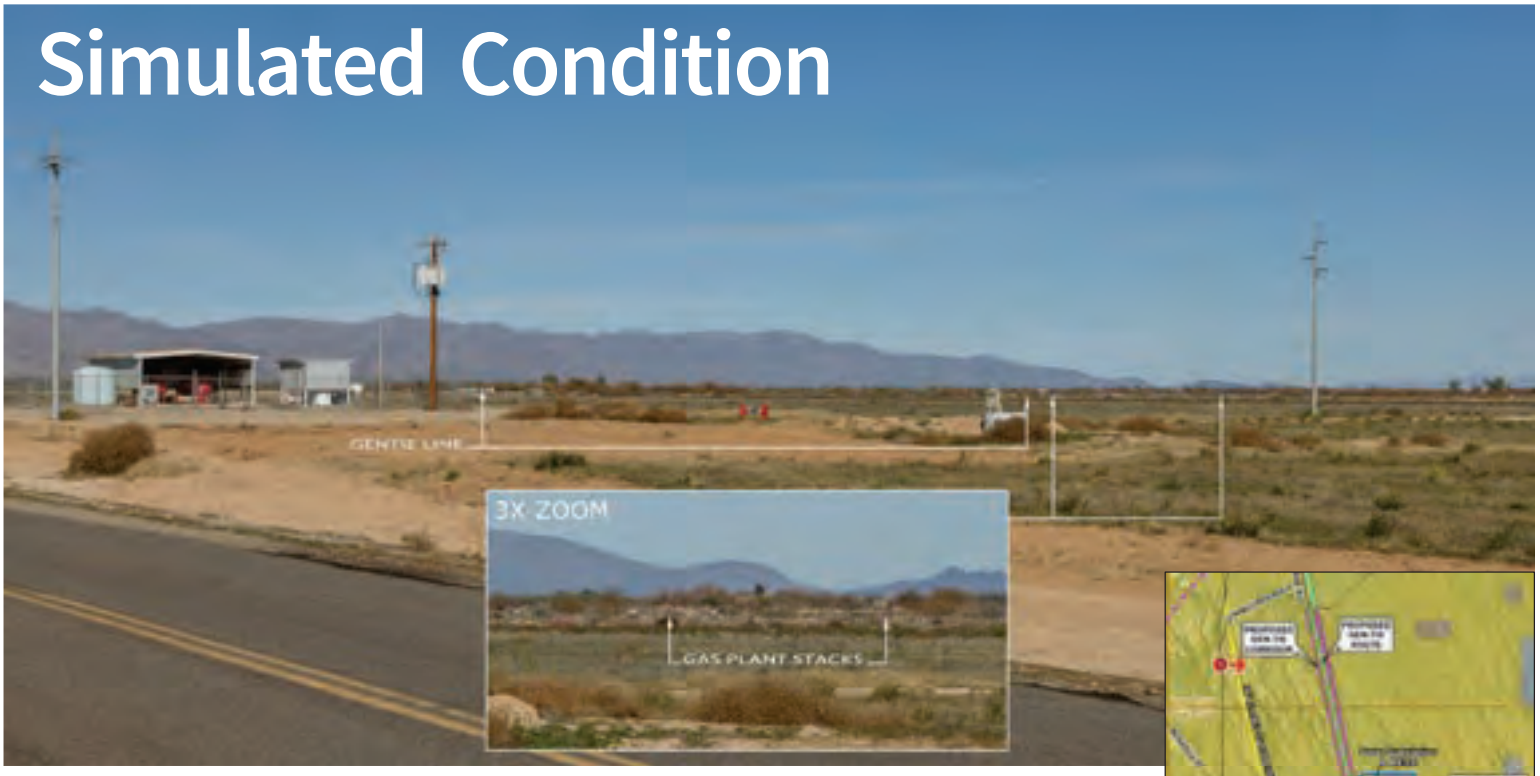
This simulation is for graphic representation only, and exact structure types and locations have not been determined.

KOP 4 (Figure E-5)
Fir Avenue & Fourth Street, Wenden – Looking Northeast



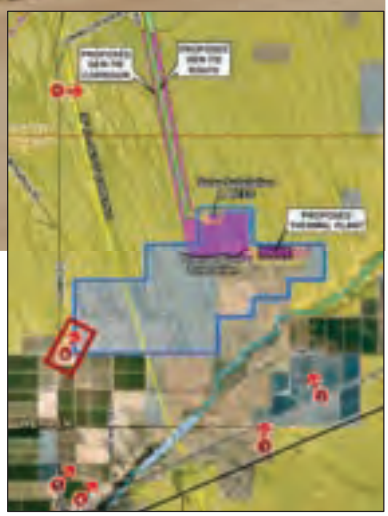
This simulation is for graphic representation only, and exact structure types and locations have not been determined.

KOP 5 (Figure E-6)
Alamo Road, Wenden – Looking Northeast



This simulation is for graphic representation only, and exact structure types and locations have not been determined.

KOP 6 (Figure E-7)
Al Dahra Farms – Looking Northeast



This simulation is for graphic representation only, and exact structure types and locations have not been determined.

EXHIBIT E-1
CULTURAL RESOURCES SURVEY MEMORANDUM

TETRA TECH

Memo

To: Kenda Pollio, Principal & Kaylan Lamb, Associate Environmental Planner
KP Environmental, Inc.
cc: Adam Furman, Erik Ellis, and Kevin Martin
BrightNight U.S. LLC
From: Deborah Huntley, Tetra Tech, Inc.
Date: May 6, 2026
Subject: Cultural Resources Memo for the Eagle Eye Energy Center and Gen-Tie Project, La Paz County, Arizona

via email: kpollio@kpenvironmental.com; klamb@kpenvironmental.com; adam@brightnightpower.com; erik@brightnightpower.com; kevin.martin@brightnightpower.com

Dear Kenda,

This memo summarizes the results of Class I research and Class III surveys completed for the Eagle Eye Energy Center and Gen-Tie Project (Project) in La Paz County, Arizona. The Project consists of a 827-acre transmission line (T-line) corridor, preliminary t-line centerline, a 50-acre gas plant, and a 100-acre thermal plant buffer (Figure 1 and Figure 2). The gas plant and thermal plant buffer are mostly within the T-line corridor. The Project covers approximately 850 acres on land administered by the Bureau of Land Management (BLM) Colorado River District Office under the Lake Havasu Field Office, land administered by the Arizona State Land Department (ASLD), and private land. For the purpose of this review, the term Project Area refers to the proposed T-Line corridor, gas plant, and thermal plant buffer. The Research Area for the records review consists of a two-mile buffer around the Project Area. Legal descriptions for the locations of Project components are shown in Table 1.

Table 1. Legal Descriptions Project Components

Township	Range	Section(s)	USGS 7.5-minute Quad
6 North	12 West	4 and 9-11	Cunningham Pass 1990, Webber Canyon 1989, Salome 1990, and Socorro Peak 1990
7 North	12 West	28, 29 and 33	Cunningham Pass

Records Review

Tetra Tech staff conducted a records search using the AZSITE database, which includes records of previous archaeological investigations and previously documented cultural resources (prehistoric, historic archaeological sites, and historic architectural resources). GIS shapefiles of previous investigations and documented cultural resources in the Research Area were downloaded on March 15, 2024 and on August 8, 2025. Additional records from the Arizona State Museum (ASM) Archaeological Records Office (ARO) were obtained on March 26, 2024 and August 28, 2025. An in-person BLM records search was conducted on March 13, 2024. This information was supplemented with a review of the National Park Service (NPS) online database (NPS 2026) of properties listed in the National Register of Historic Properties (NRHP) and the Arizona Register of Historic Places (ARHP). Tetra Tech also reviewed historic Arizona General Land Office (BLM 2026) records to determine

whether vestiges of trails, transportation routes, homesteads, or other potential historic resources were present in the Project Area. The records search indicates that there have been 14 previous cultural resources investigations between 1979 and 2018 within the Research Area (Table 2; Figure 2). None of these previous surveys overlap with the Project Area.

Table 2. Previously Conducted Surveys in the Research Area

Activity No.	Project Name	Author(s)	Year
1979-126.ASM	Bouse Hills-Harcuvar-Little Harquahala 115 kV Transmission Line	No Data	1979
1994-202.ASM	Cultural Resource Studies for the North-South Transfer Pipeline, West-Central Arizona: Class I Survey. Dames & Moore Intermountain Cultural Resource Series Research Paper 16A. Phoenix, Arizona.	Rogge, A.E., David Boylan, and Glenn P. Darrington	1994
1997-194.ASM	Archaeological Assessment of Arizona Public Service Company's Proposed 12 kV Power Line Extension Near Harcuvar Substation, La Paz County, Arizona. Archaeological Consulting Services Project 97-45. Tempe, Arizona.	Adams, Kim	1997
2001-450.ASM	Wickenburg Road	No Data	No Data
2003-246.ASM	A Class III Cultural Resources Survey of the Electric Lightwave, Inc. Southwest Fibernet Project Fiber Optic Line Right-of-Way From Las Vegas, Nevada to Phoenix, Arizona: The Arizona Segment	Foster, Michael S., Annick Lascaux, and Dale R. Gerken	2003
2003-318.ASM	Electric Lightwave Right-of-Way Survey	No Data	No Data
2004-807.ASM	Cultural Resources Survey of the Bonanza Mine Extension Line, La Paz County, Arizona. Archaeological Consulting Services, Ltd. ACS Project # 02-031-02A. Tempe, Arizona.	Gage, Gina S.	2002
2005-1306.ASM	A Cultural Resources Survey of Proposed Construction Sites along El Paso Natural Gas Line 1104 (Wenden to Franconia Junction) in La Paz and Mohave Counties, Arizona. SWCA Environmental Consultants. Cultural Resources Report No. 06-01. Tucson, Arizona.	Levstik, Jennifer, and Jerome S. Hesse	2006
2009-278.ASM	An Archaeological Survey of the Proposed Cathodic Protection Station No. 2035 along EPNG line 1104, La Paz County, Arizona. SWCA Cultural Resources Report No. 08-289. SWCA Environmental Consultants, Tucson, Arizona.	Barr, David M.R., and S. Jerome Hesse	2008
2016-357.ASM	A Cultural Resource Survey of 2.65 Miles along 2nd Street/Alamo Road in Wenden, North of US Highway 60 at Milepost 61.50, La Paz County, Arizona. AZTEC Report No. AZ16-10. AZTEC Engineering Group, Phoenix, Arizona.	Bowler, Maggie R., and Scott Solliday	2016
2018-0252.ASM	Class III Cultural Resources Inventory for the Harcuvar-Little Harquahala Pumping Plant and Bouse Hills Pumping Plant-Harcuvar 115kV Transmission Line Repair Project, La Paz County, Arizona.	Wygant, Lindsay, and Jonathan Knighton-Wisor	2018
94-15.BLMH	No Data	No Data	No Data
98-5.BLMH	No Data	No Data	No Data
06-42.BLM	No Data	No Data	No Data

ASM=Arizona State Museum; BLM/BLMH=Bureau of Land Management

Previously Documented Cultural Resources

The review identified 11 archaeological sites within the Research Area, none of which are within the Project Area (Table 3; see Figure 2). Previously documented sites in the Research Area include three prehistoric sites (an artifact scatter, a site with a boulder shelter and pictograph panel, and a

site with a feature and associated artifacts), seven historic sites (the Arizona and California Railway, three unimproved roads, the Arizona Public Service transmission line, and two trash scatters), and one multicomponent (prehistoric and historic) site with grinding slicks, a trail, and stone circle). One site, the Arizona and California Railway, has been determined eligible individually for listing in the NRHP; one site has been recommended eligible; two sites are not evaluated for listing in the NRHP; three sites have been determined ineligible individually; and four sites are recommended ineligible individually.

Table 3. Previously Documented Sites in the Research Area

Site Number	Time Period	Site Type	NRHP Eligibility Status
AZ R:4:16(ASM)	Historic	Arizona and California Railway	Eligible Individually (multiple SHPO numbers)
AZ S:2:3(ASM)	Multicomponent	Grinding Slicks, Trail, and Stone Circle	Recommended Ineligible
AZ S:2:4(ASM)	Prehistoric	Boulder Shelter, Pictograph Panel	Recommended Eligible
AZ S:2:20(ASM)	Historic	Trash Scatter	Ineligible Individually (SHPO-2001-2944)
AZ S:2:21(ASM)	Prehistoric	Feature and Associated Artifacts	Ineligible Individually (SHPO-2001-2944)
AZ S:2:25(ASM)	Historic	Arizona Public Service Powerline	Recommended Ineligible
AZ S:2:26(ASM)	Historic	Unimproved Road	Recommended Ineligible
AZ S:2:27(ASM)	Historic	Unimproved Road	Recommended Not Evaluated
AZ S:2:28(ASM)	Historic	Unimproved Road	Ineligible Individually (SHPO-2016-1234)
AZ S:2:29(ASM)	Historic	Trash Scatter	Recommended Ineligible
AZ T:3:6(ASM)	Prehistoric	Artifact Scatter	Not Evaluated (SHPO-2024-0092)

ASM = Arizona State Museum; NRHP = National Register of Historic Places

State and National Register Properties

There are no sites currently listed in the NRHP or the ARHP within the Research Area.

Survey Results

Tetra Tech conducted three cultural resources surveys for other projects that in total covered the entirety of the proposed Project Area (see Figures 1 and 2). First, Tetra Tech conducted a Class III cultural resources inventory for a proposed energy center on BLM-administered land (Byszewski et al. 2025) that covered approximately 379 acres of the proposed T-line corridor. Second, Tetra Tech conducted a Class III cultural resources inventory for a proposed energy center on ASLD-administered land (Huntley and Turney 2026a) that covered approximately 289 acres of the proposed T-line corridor. Finally, Tetra Tech conducted a due diligence cultural resources inventory for a proposed energy center on private land (Huntley and Turney 2026b) that covered approximately 159 acres of the proposed T-line corridor, all of the gas plant, and all of the thermal plant buffer.

The results of Tetra Tech's surveys are summarized below (Table 4). The pedestrian surveys documented no archaeological sites and documented 24 isolated finds. Two types of isolates were recorded. Per the *ASM Archaeological Site Recording Manual* (ASM 1993), an isolated feature is defined as a feature that does not have any other features within 100 meters. An isolated occurrence is defined as a single artifact or small group of artifacts that does not meet the criteria for sites described above. In accordance with *ASM's Policy and Procedures Regarding Historical-Period Waste Piles* (ASM

2021) and as directed by the BLM Lake Havasu Field Office, concentrations of mass- produced, historical-period artifacts were recorded as isolated finds.

The majority (21 or 88 percent) of isolated finds in the Project Area are historic. These are either single artifacts or groups of artifacts. They tend to date from the Late Historic Period (A.D. 1900-1950) through recent times. Two artifacts are prehistoric. These are a complete, Ventana side notched, jasper projectile point (BN2-JS-IF-02) that dates between about 5,000 and 3,800 B.C.(Justice 2002) and a tertiary red chert flake (BN2-JS-IF-52) of unknown time period. Finally, a Tizon Brown Ware jar/olla body sherd (BN2-JS-IF-60) has a manufacturing date that spans the prehistoric and protohistoric periods (ca. A.D.700-A.D.-1890) (NAU 2001). The isolates indicate a range of activities, including prehistoric hunting and possible food preparation or resource procurement, as well as historic food consumption and refuse dumping.

Table 4. Isolated Finds (IFs) in the Project Area

Temp Number	Isolate Type	Cultural Affiliation	Time Period
BN-JS-IF-16	Hole-in-top and paint cans	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN-JS-IF-17	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-18	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-21	1) Hole-in-top cans n=2; 2) Sanitary cans n=9; 3) Oil can n=1; 4) Aluminum pull-tab cans n=3; 5) Clear glass jar with “Ball D19” maker’s mark)	Euro-American	Middle Historic–Recent (A.D. 1800-Present) (Rock 1993)
BN-JS-IF-22	1) Hole-in-top can n=1; 2) Sanitary can n=1; 3) Baking powder can, Calumet Baking Powder Company n=1; 4) Green glass bottle n=1; 5) Clear glass bottle n=1)	Euro-American	Middle Historic–Late Historic (A.D. 1800–1950) (Rock 1993)
BN-JS-IF-26	Hole-in-top and coffee cans	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-27	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-28	Hole-in-top and cone top cans	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-29	1) Hole-in-top can n=1; 2) Embossed oil can n=1; 3) Sanitary cans n=3)	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN-JS-IF-30	Hole-in-top and Sanitary cans	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-31	Hole-in-top cans	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN-JS-IF-34	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Rock 1993)
BN2-JS-IF-02	Complete projectile point, Ventana side notched, jasper	Native American	Middle to Late Archaic (5,000–3,800 B.C.) (Justice 2002)
BN2-JS-IF-35	1) Hole-in-top can; 2) Friction lid square tin; 3) Owens Illinois glass food jar	Euro-American	Late Historic–Recent (A.D. 1900–1950) (Lockhart et al. 2016)
BN2-JS-IF-36	Metal lantern-Kerosene	Euro-American	Late Historic–Recent (A.D. 1900–1950)
BN2-JS-IF-37	1) Hole-in-top can; 2) Sanitary can; 3) Hole-in-cap can	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-52	Tertiary red chert flake	Native American	Prehistoric (12,000 B.C.–A.D.1500)
BN2-JS-IF-54	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-55	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)

Temp Number	Isolate Type	Cultural Affiliation	Time Period
BN2-JS-IF-56	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-57	1) Hole-in-top can n=47; 2) Sanitary cans n=9; 3) Rectangular crushed meat tin; 4) Glass clear condiment jar, screw top; 5) Crushed hinge lid tobacco tin	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-58	Hole-in-top cans n=2	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-59	1) Hole-in-top cans n=2; 2) Hole-in-cap can; 3) Sanitary can; 4) Clear glass bottle fragment	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-60	Tizon Brown Ware jar/olla body sherd	Native American	Prehistoric-Protohistoric (A.D.700-A.D.-1890) (NAU 2001)

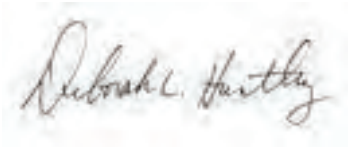
A.D. = Anno Domini; B.C. = Before Christ

NRHP Eligibility and Management Recommendations

Per the *ASM Archaeological Site Recording Manual* (1993), Tetra Tech recommends that all 24 isolates are not eligible for listing in the NRHP. Tetra Tech submits that thorough in-field documentation of the 24 isolates has exhausted their information potential (Criterion D) and that they are not eligible for listing in the NRHP under any of the other eligibility criteria. Thus, no additional management recommendations are necessary. The ASLD, BLM, and SHPO have concurred with these recommendations.

If you have any questions or require additional information, please feel free to call me at 720.340.9474.

Sincerely,



Deborah L. Huntley, PhD, RPA
Principal Archaeologist – Southwest

Deborah.Huntley@tetratech.com

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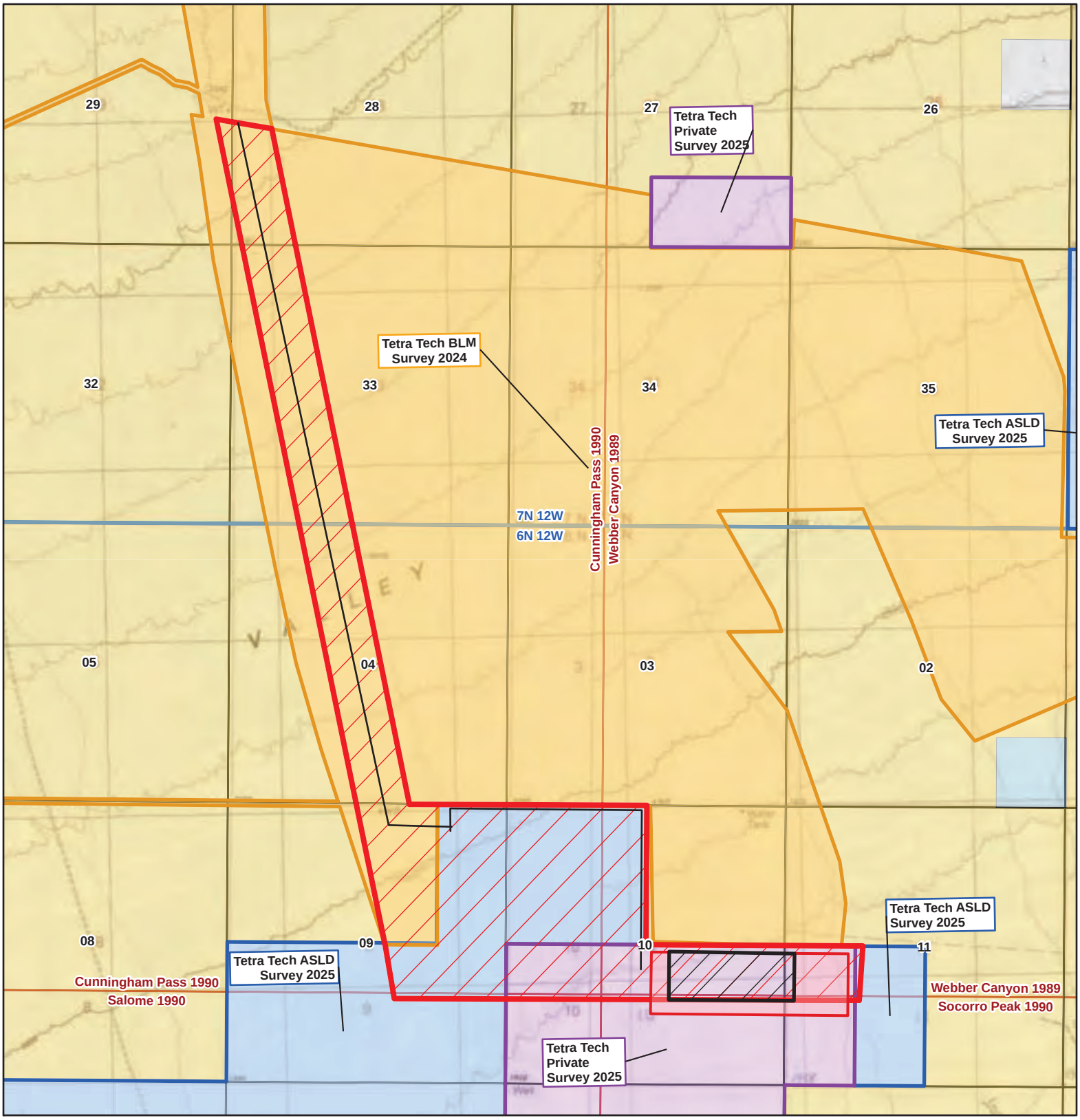


EAGLE EYE ENERGY CENTER AND GEN-TIE PROJECT

Figure 1

Project Overview
USGS Topographic Map

LA PAZ COUNTY, ARIZONA

TETRA TECH

Project Components

- Proposed T-Line
- Gas Plant
- Thermal Plant Buffer
- T-Line Corridor
- Tetra Tech ASLD Survey 2025
- Tetra Tech BLM Survey 2024
- Tetra Tech Private Survey 2025

Boundaries

- County
- PLSS Township
- PLSS Section
- USGS 7.5m Quadrangle

Land Management

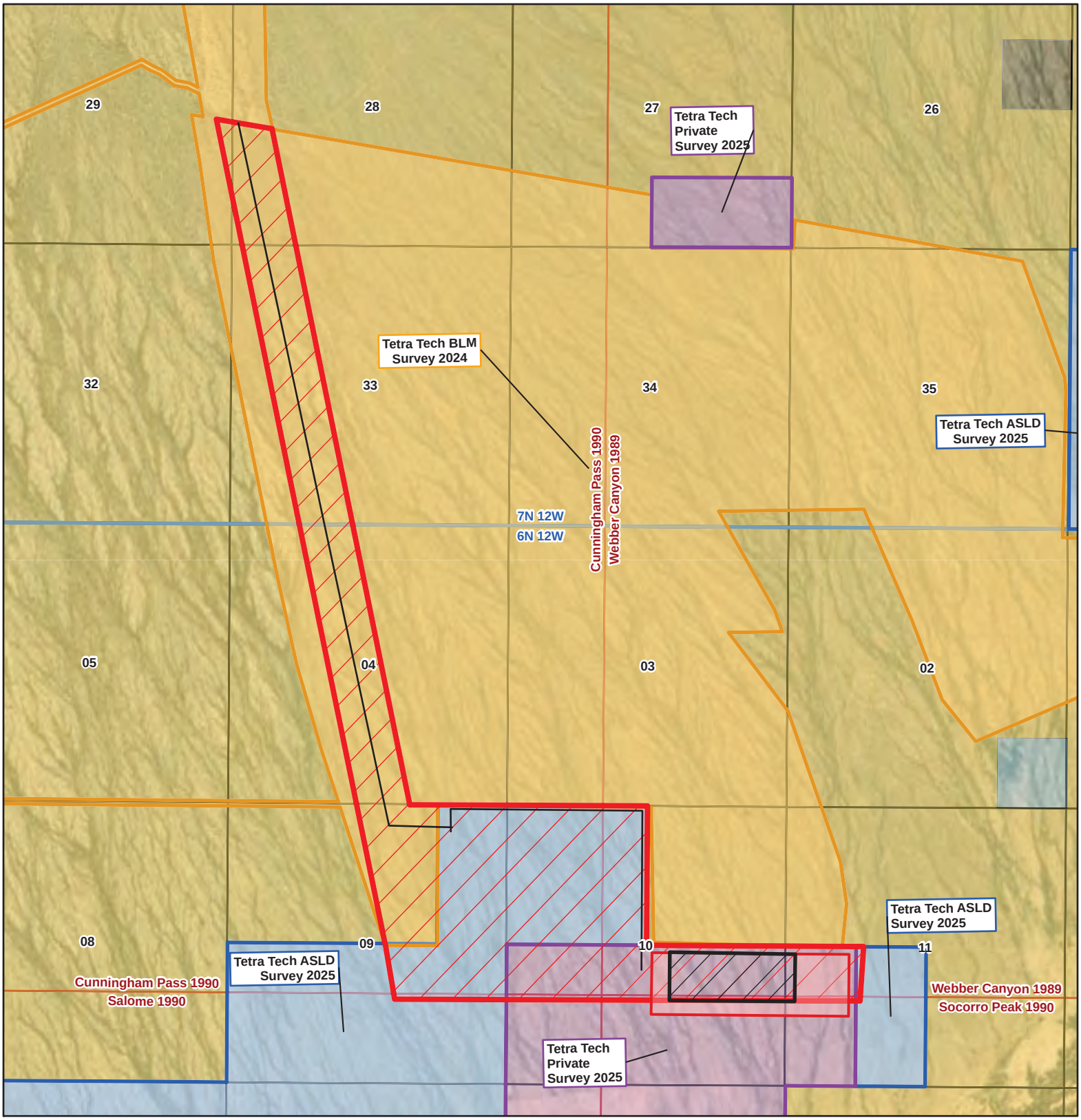
- BLM
- Private
- State

N

1:30,000

Coordinate System: NAD 1983 UTM Zone 12N

NOT FOR CONSTRUCTION



EAGLE EYE ENERGY CENTER AND GEN-TIE PROJECT

Figure 2

Project Overview
Aerial Map

LA PAZ COUNTY, ARIZONA

TETRA TECH

Project Components

- Proposed T-Line
- Gas Plant
- Thermal Plant Buffer
- T-Line Corridor
- Tetra Tech ASLD Survey 2025
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- Tetra Tech Private Survey 2025

Boundaries

- County
- PLSS Township
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- USGS 7.5m Quadrangle

Land Management

- BLM
- Private
- State

N

1:30,000

Coordinate System: NAD 1983 UTM Zone 12N

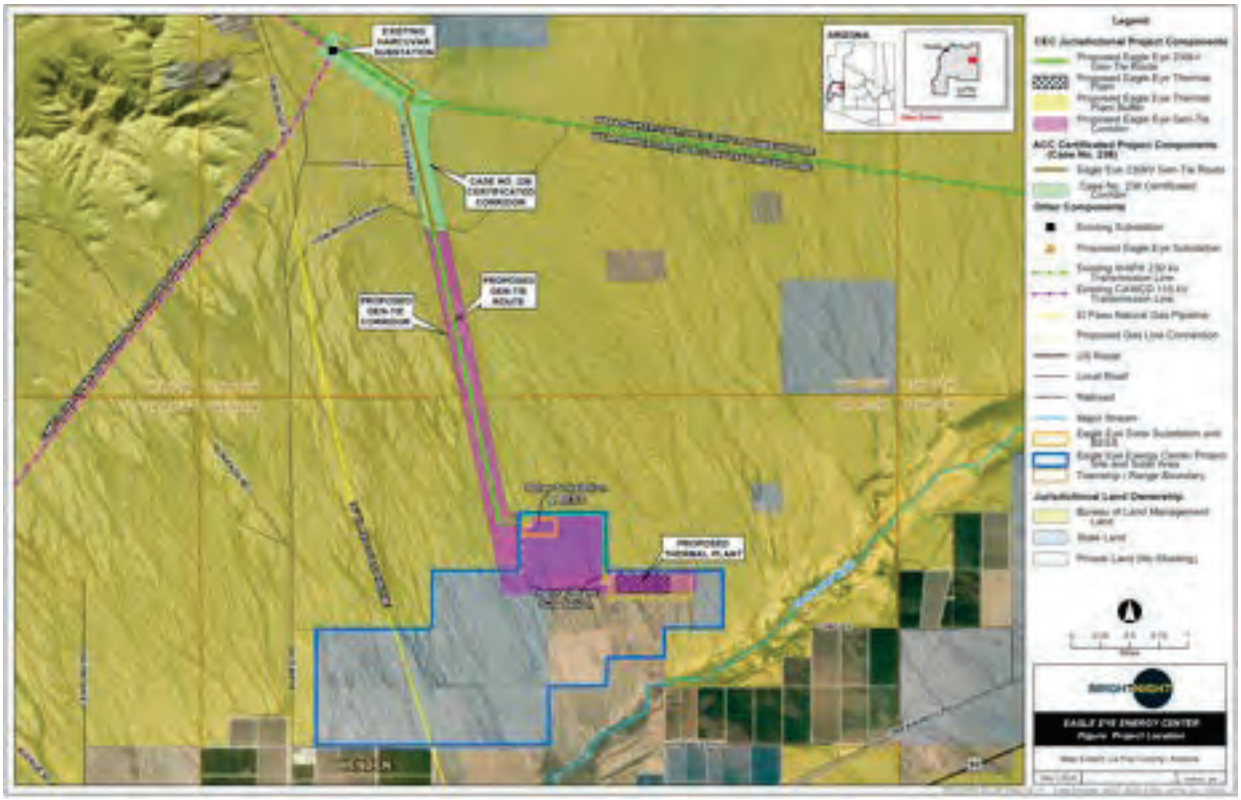
NOT FOR CONSTRUCTION

EXHIBIT E-2
TRIBAL CONSULTATION

From:	Kaylan Lamb
To:	betsitty@crit-nsn.gov
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:13:11 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

Dear Director Mr. Bryan Etsitty,

EAGL, LLC (the Applicant) is proposing the construction of up to 600 megawatts (MW) of simple-cycle thermal power electric 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, BLM, and Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land). The Thermal Plant and Proposed Gen-Tie is collectively referred to as the Project (see below **Figure: Project Location**). The overall Energy Center, as depicted below, 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 Applicant is seeking a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Committee (ACC) for the Project. A CEC is required for the Project because it includes a Thermal Plant and the proposed transmission line voltage is above 115 kV and over 1-mile in length. The Applicant anticipates filing the CEC at the beginning of June 2026. The Applicant obtained the list of Tribes with claims in the Project area by consulting the Arizona State Historic Preservation Office (SHPO) Government-to-Government Consultation Toolkit. Consulting parties for this Project are the Arizona SHPO, the Ak-Chin Indian Community, the Chemehuevi Indian Tribe, the Colorado River Indian Tribes, Fort McDowell Yavapai Nation, the Fort Mojave Indian Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of

Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai Apache Nation, and the Yavapai Prescott Indian Tribe.

Cultural resource investigations have been conducted in the vicinity of the proposed Project. A Class I and three Class III cultural resource surveys have been conducted that cover the entirety of the proposed Thermal Plant Project site and Gen-tie. A Class I was conducted that covered the entire Energy Center and identified previous cultural surveys. Three Class III surveys have been completed and cover the Thermal Plant site and Gen-Tie Project. First, a Class III cultural resources inventory was conducted on BLM-administered land (Byszewski et al. 2025) that covered approximately 379 acres and covers the Gen-tie corridor. Second, a Class III cultural resources inventory was conducted on ASLD-administered land (Huntley and Turney 2026a) that covered approximately 289 acres and covers the Gen-tie corridor. Finally, a due diligence cultural resources inventory was conducted on private land (Huntley and Turney 2026b) that covered approximately 159 acres and includes the Thermal Plant site. The attached **Cultural Resources Memo for the Eagle Eye Energy Center and Gen-Tie Project** summarizes the results of the above surveys. This memo was prepared by Tetra Tech, the company that conducted and prepared these Class III surveys. As mentioned, we have attached the summary memo, and can provide the full Class III surveys upon request.

We are inquiring whether you have any concerns regarding cultural resources as well as any sites of traditional, religious, cultural, or historical importance to your community within the Project vicinity. The Applicant will be filing the CEC Application in mid-June, 2026 and hearings with the Arizona Power Plant and Transmission Line Siting Committee will start August 3, 2026. We would greatly appreciate your comments prior to filing our application by June 11, 2026. Please provide comments by mail, email or by phone at the information listed below:

Kaylan Lamb
280 Melba Rd
Encinitas, CA 92024
klamb@kpenvironmental.com
858 243-6575

Your correspondence will be included as part of the Project record that is filed with the ACC. All cultural resource locational information, including maps, will be redacted from any copies of the document available to the general public. If you have any further questions or would like to discuss this document, please do not hesitate to contact me.

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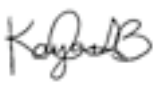
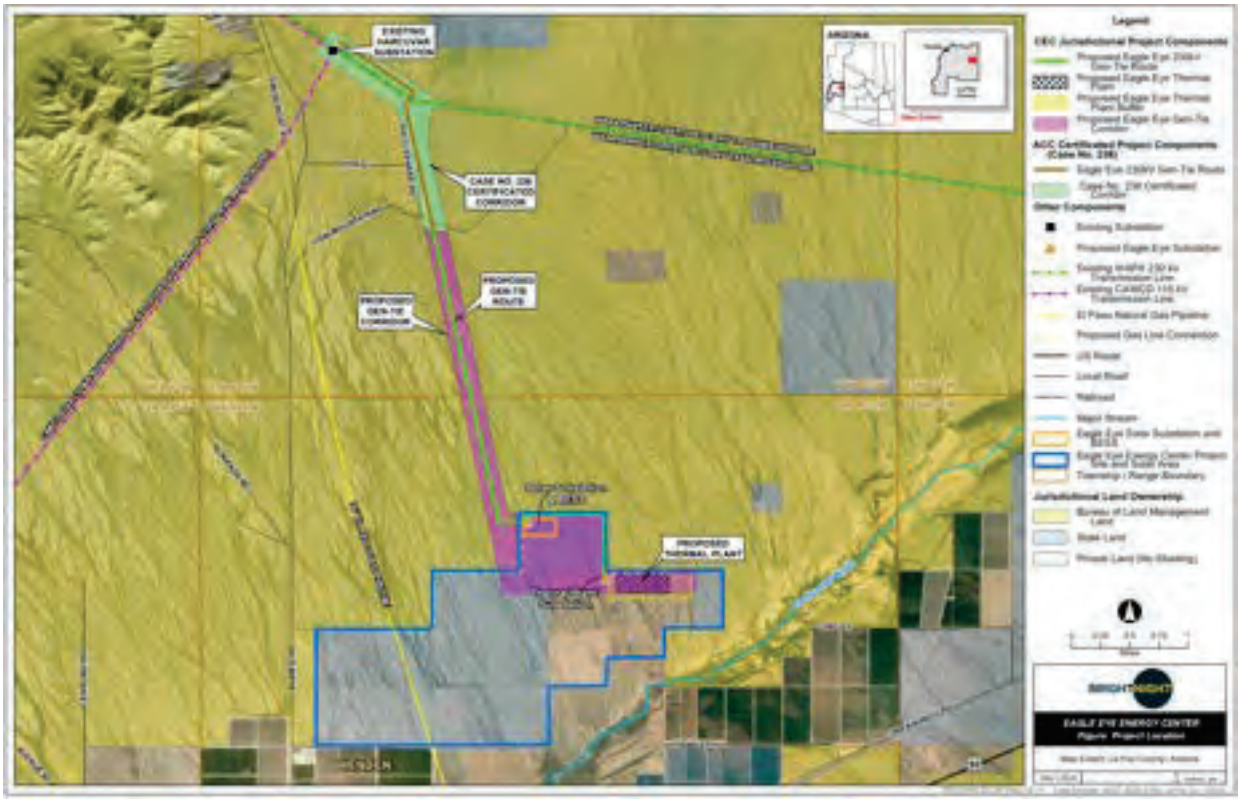


Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com

From:	Kaylan Lamb
To:	Larry.BenallieJr@gric.nsn.us; Reylynne.Williams@gric.nsn.us
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:26:10 PM
Attachments:	image001.png Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image002.png

Dear Governor Stephen Roe Lewis,

EAGL, LLC (the Applicant) is proposing the construction of up to 600 megawatts (MW) of simple-cycle thermal power electric 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, BLM, and Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land). The Thermal Plant and Proposed Gen-Tie is collectively referred to as the Project (see below **Figure: Project Location**). The overall Energy Center, as depicted below, 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).



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Kaylan Lamb
280 Melba Rd
Encinitas, CA 92024
klamb@kpenvironmental.com
858 243-6575

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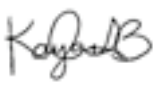
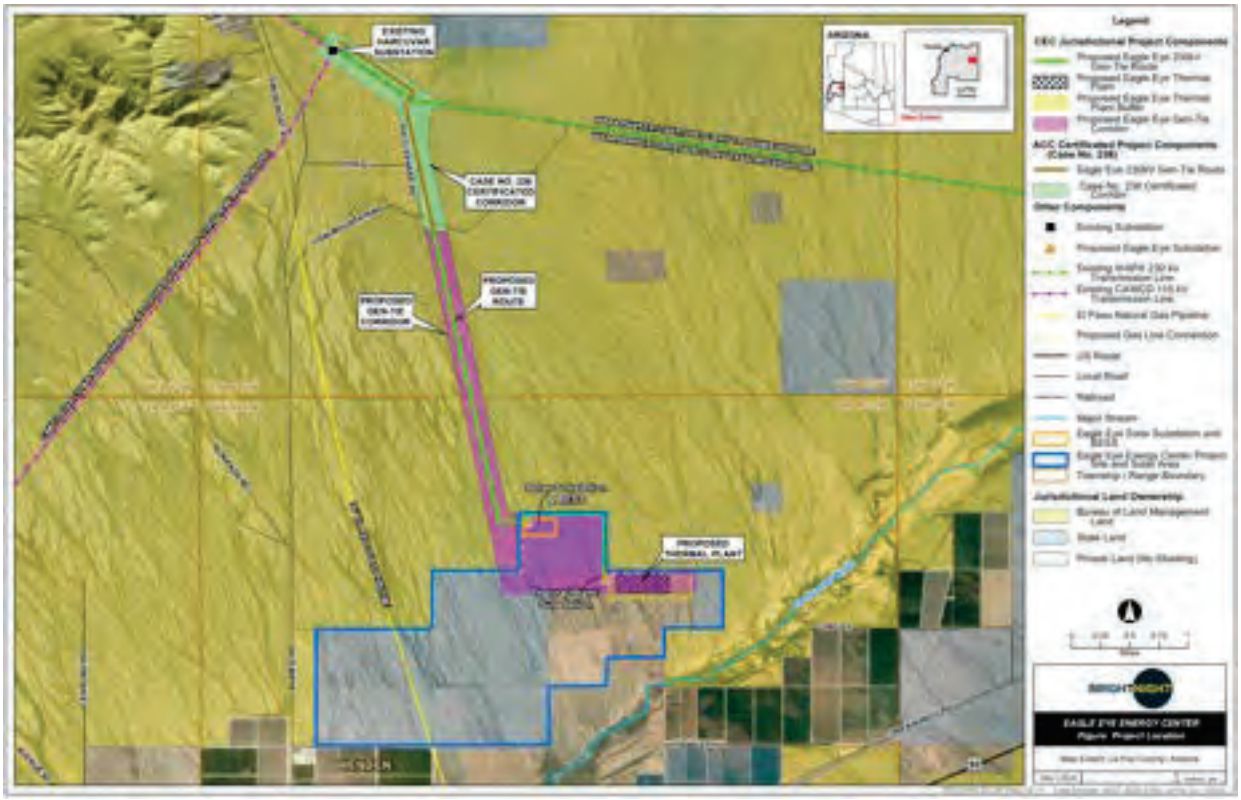


Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com

From:	Kaylan Lamb
To:	kdongoske@gmail.com
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:31:16 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

Dear Mr. Kurt Dongoske,

EAGL, LLC (the Applicant) is proposing the construction of up to 600 megawatts (MW) of simple-cycle thermal power electric 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, BLM, and Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land). The Thermal Plant and Proposed Gen-Tie is collectively referred to as the Project (see below **Figure: Project Location**). The overall Energy Center, as depicted below, 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).



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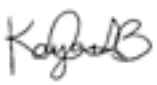

Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com

From:	Kaylan Lamb
To:	Shane.Anton@srpmic-nsn.gov; Angela.garcia-lewis@srpmic-ns.gov; Martha.Martinez@srpmic-nsn.gov; Sunday.Eiselt@srpmic-nsn.gov; April.Lewis@srpmic-nsn.gov
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:35:08 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

Dear President Martin Harvier,

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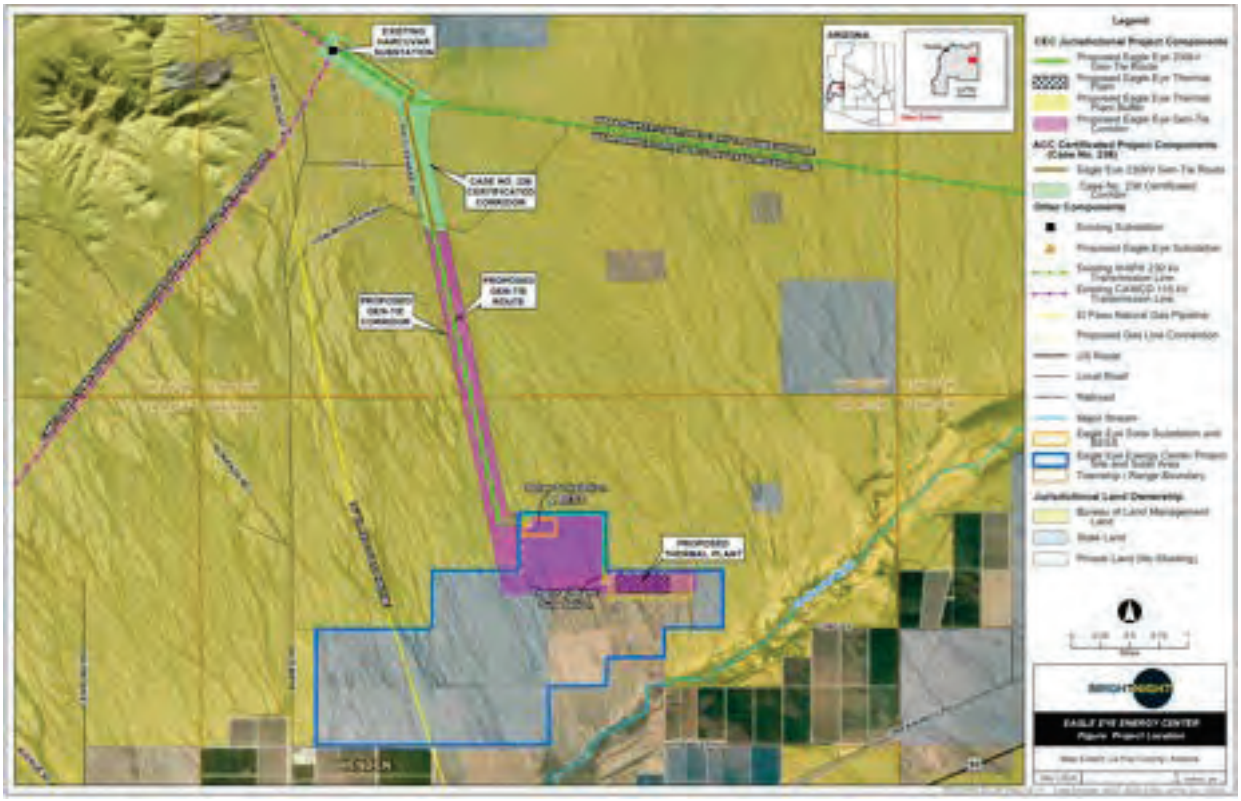

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Sincerely,

Kaylan Lamb, Project Manager
858.243.6575

From:	Kaylan Lamb
To:	brochajr@yan-tribe.org
Cc:	mjuan@yan-tribe.org; bmccabe@yan-tribe.org; omcmahon@yan-tribe.org
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:38:22 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

Dear Chairman Mr. Buddy Rocha, Jr.,

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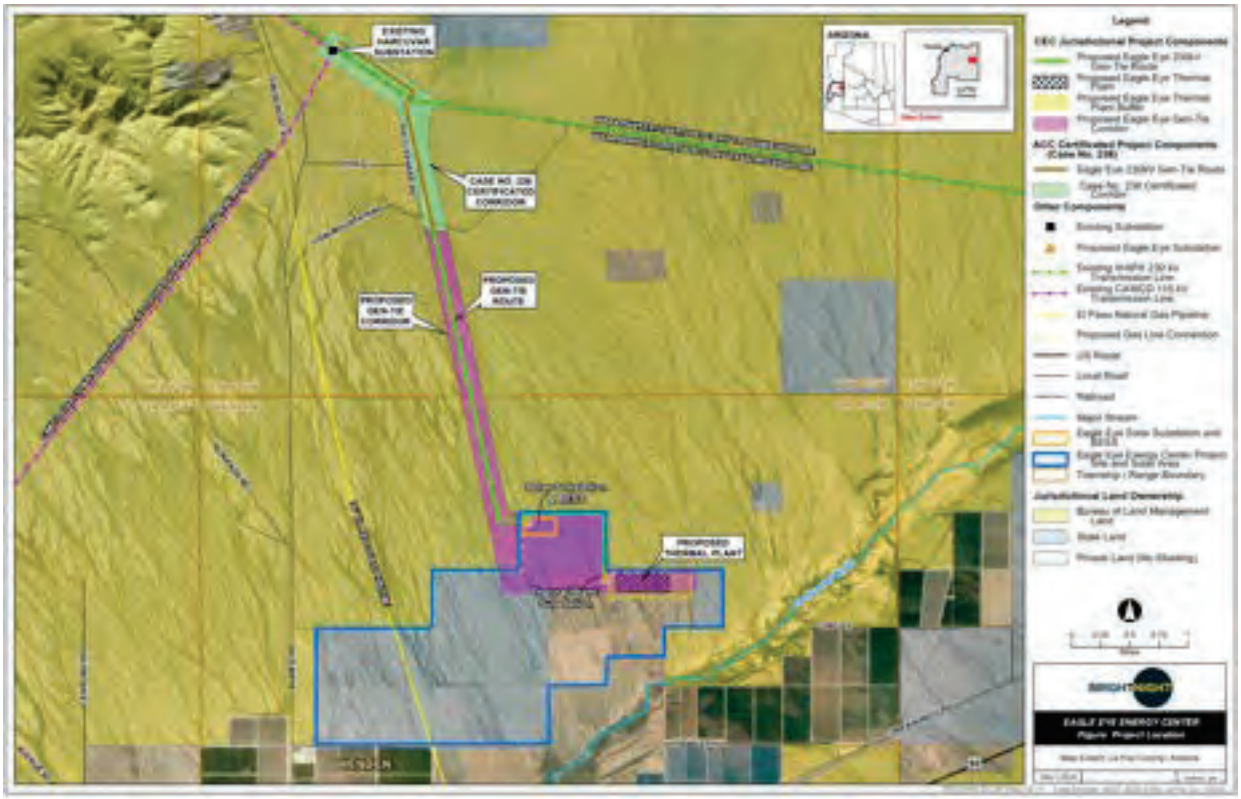

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Sincerely,

Kaylan Lamb, Project Manager
858.243.6575

From:	Kaylan Lamb
To:	abradfield@ypit.com
Cc:	logo@ypit.com
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:40:27 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image002.png

Dear President Robert Ogo,

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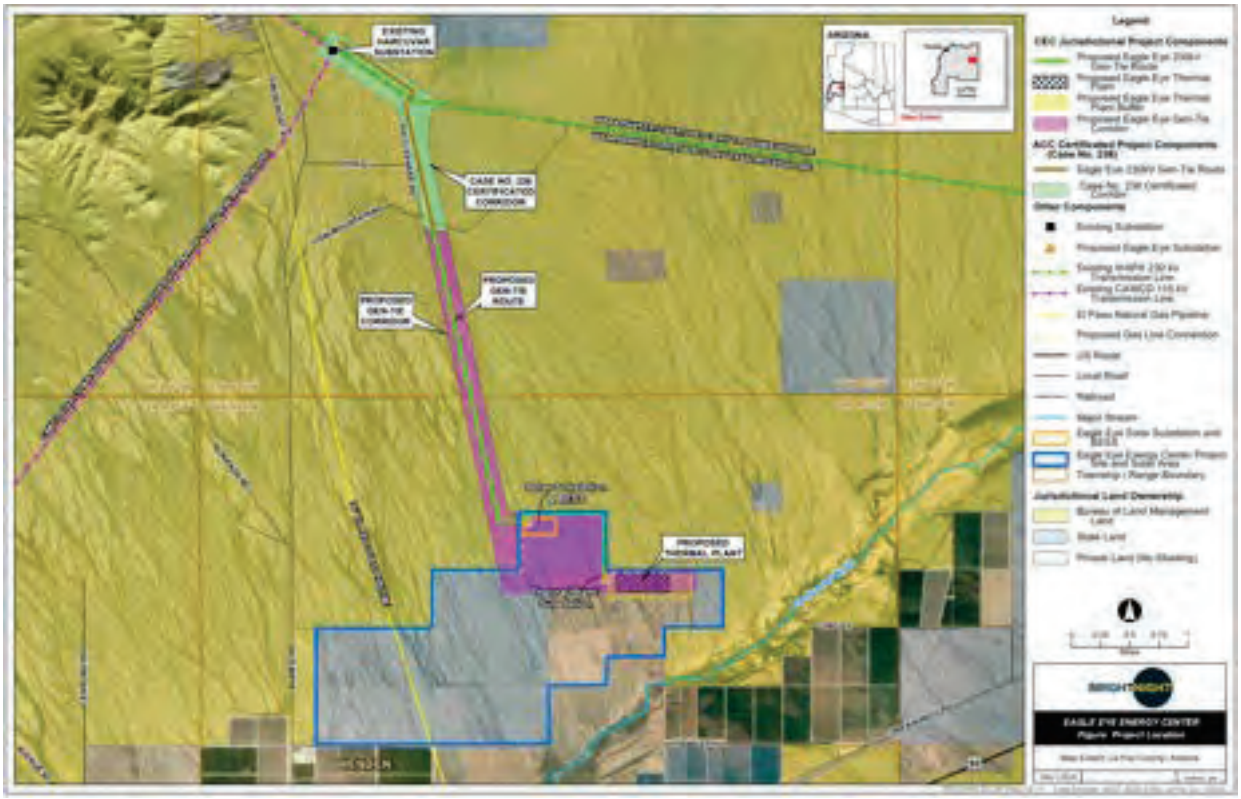

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Kaylan Lamb
280 Melba Rd
Encinitas, CA 92024
klamb@kpenvironmental.com
858 243-6575

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Sincerely,

Kaylan Lamb, Project Manager
858.243.6575

From:	Kaylan Lamb
To:	epeters@ak-chin.nsn.us; twind@ak-chin.nsn.us
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:49:18 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image002.png

Dear Chairman Gabriel Lopez,

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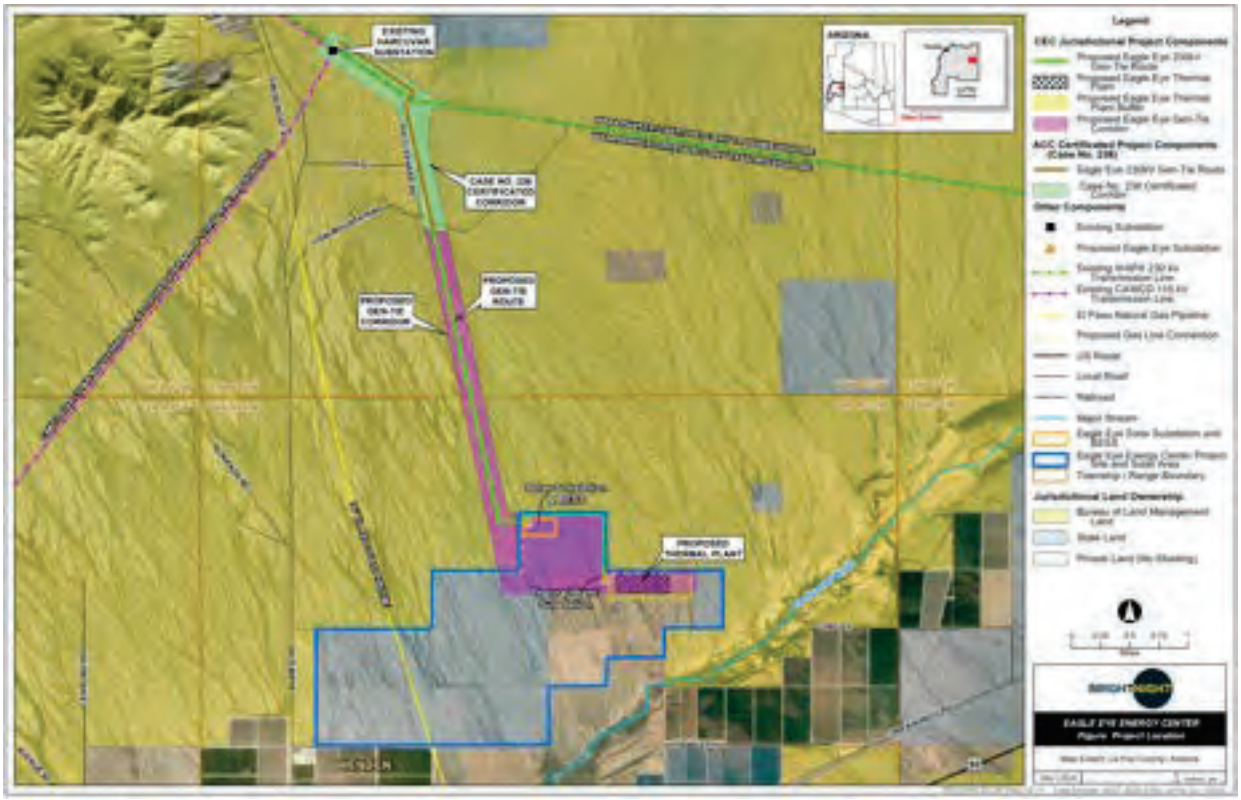

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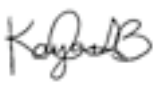
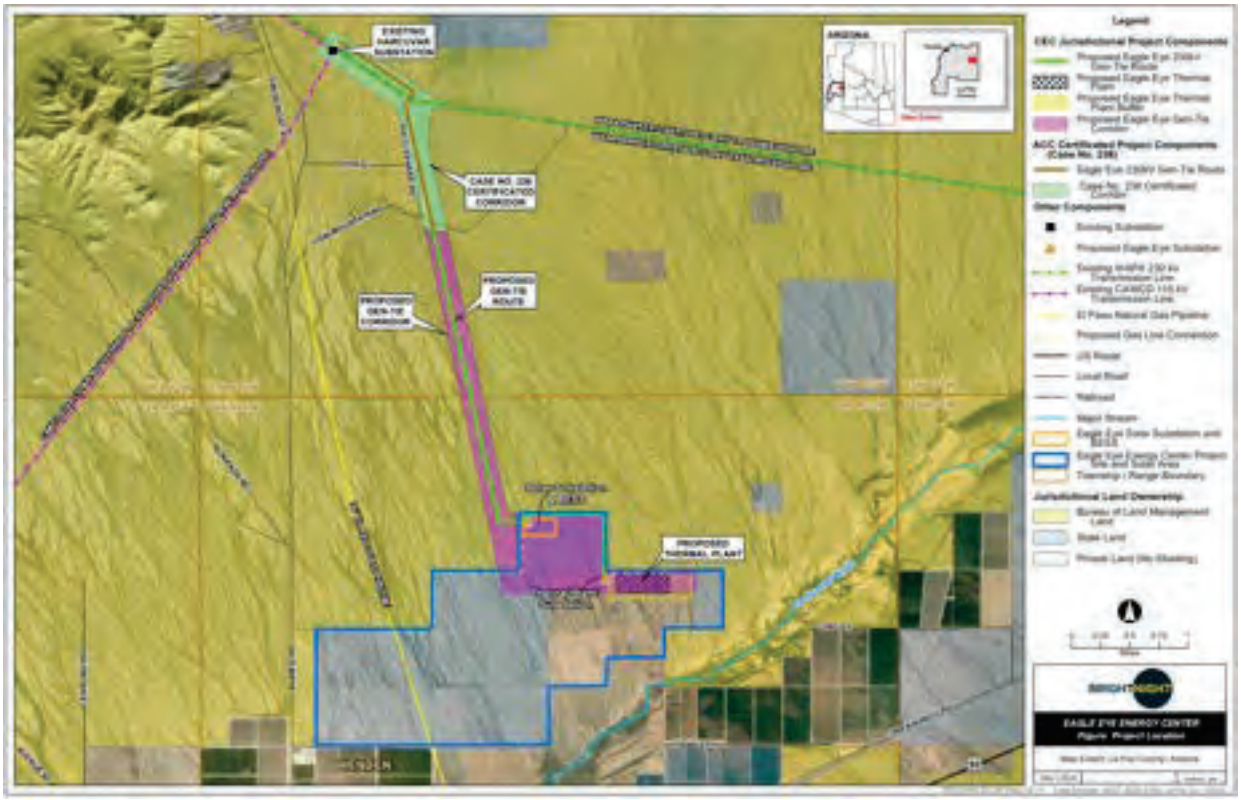


Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com

From:	Kaylan Lamb
To:	executivesecretary@quechantribe.com
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:55:06 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image002.png

Dear President Jonathan Koteen,

EAGL, LLC (the Applicant) is proposing the construction of up to 600 megawatts (MW) of simple-cycle thermal power electric 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, BLM, and Arizona State Trust Land managed by the Arizona State Land Department (ASLD) (ASLD Land). The Thermal Plant and Proposed Gen-Tie is collectively referred to as the Project (see below **Figure: Project Location**). The overall Energy Center, as depicted below, 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).



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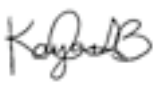

Kaylan Lamb, Project Manager
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From:	Kaylan Lamb
To:	Richard.Saunders@tonation-nsn.gov; eric.verwys@tonation.nsn.gov
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Tuesday, May 12, 2026 5:56:03 PM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

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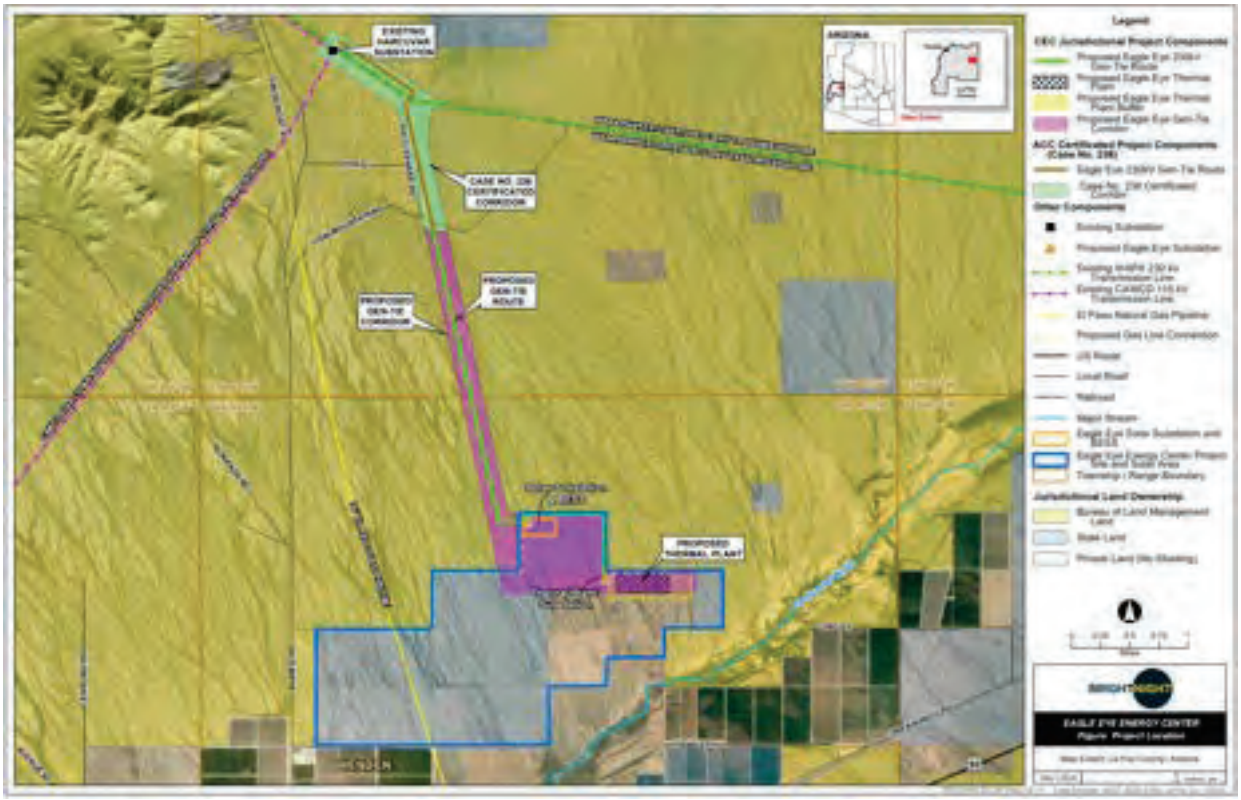

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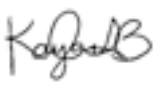

Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com

From:	Kaylan Lamb
To:	azshpo@azstateparks.gov
Cc:	cklebacha@azstateparks.gov
Subject:	Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Wednesday, May 13, 2026 8:51:10 AM
Attachments:	Eagle Eye CEC Cultural Resources_Memo_May2026.pdf image001.png image003.png

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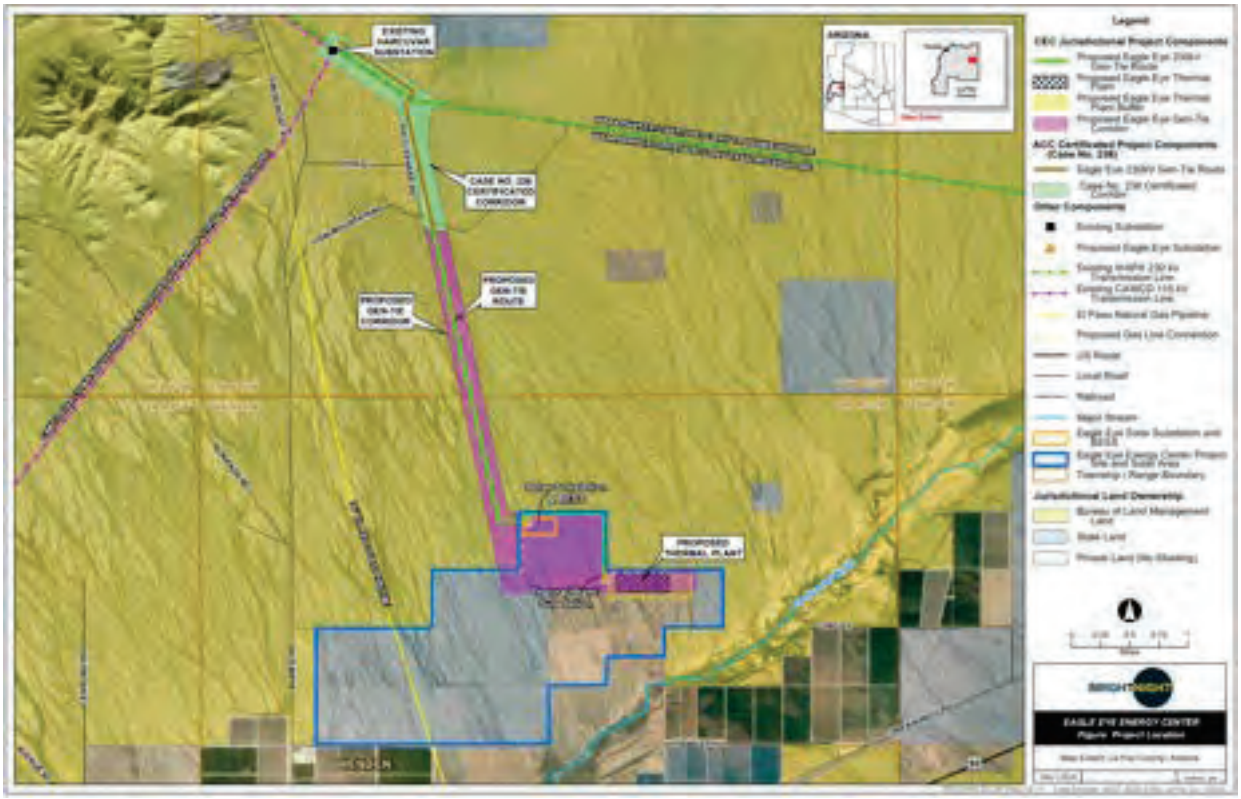

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858.243.6575

May 12, 2026

Mr. Gabriel Lopez, Chairman
Ak-Chin Indian Community
42507 W. Peters & Nall Road
Maricopa, AZ 85138

RE: Eagle Eye Thermal Plant and Gen-Tie Project
Tribal Consultation for the Certificate of Environmental Compatibility

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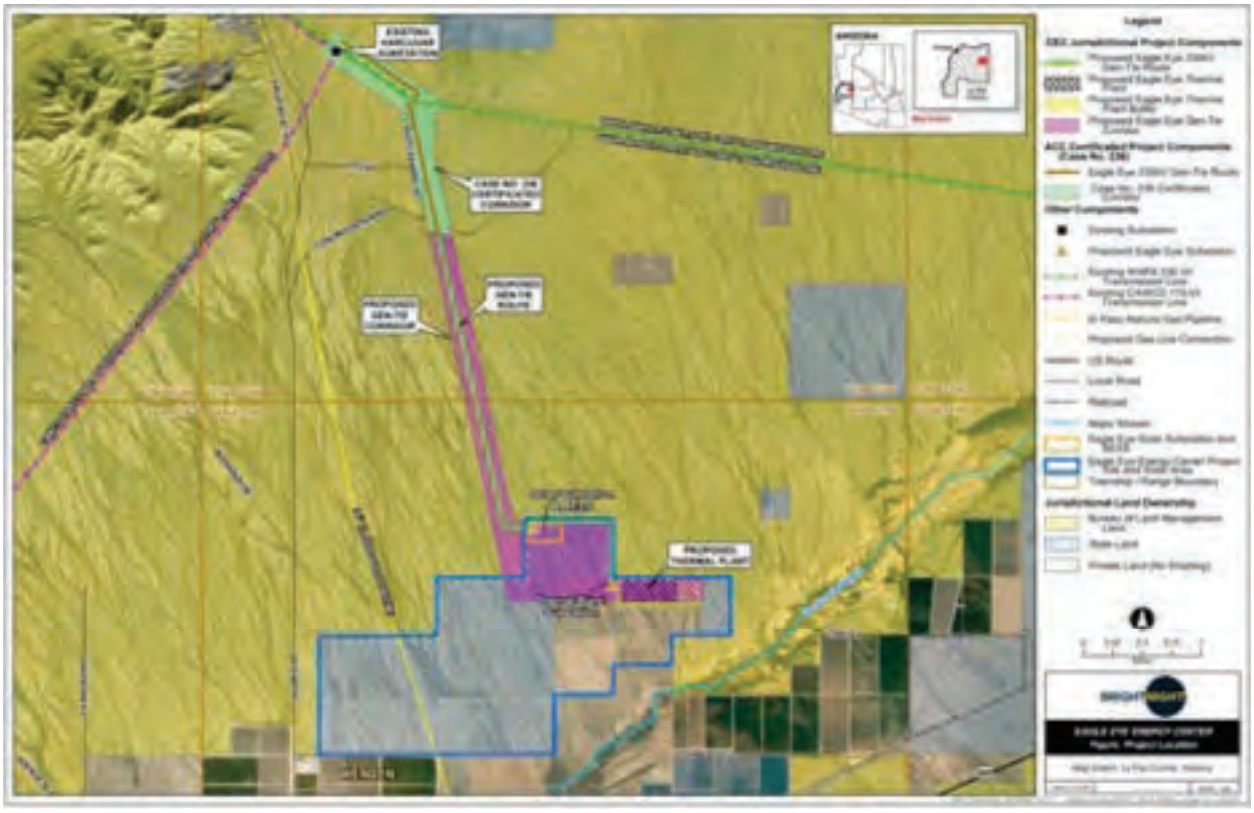

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280 Melba
Encinitas, CA 92024
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CC:

Ak-Chin Indian Community
Cultural Resources Program
42507 W. Peters & Nall Road
Maricopa, AZ 85138

epeters@ak-chin.nsn.us
twind@ak-chin.nsn.us

May 12, 2026

Ms. Sandra Pattea
President
Fort McDowell Yavapai Nation
P.O. Box 17779
Fountain Hills, AZ 85269

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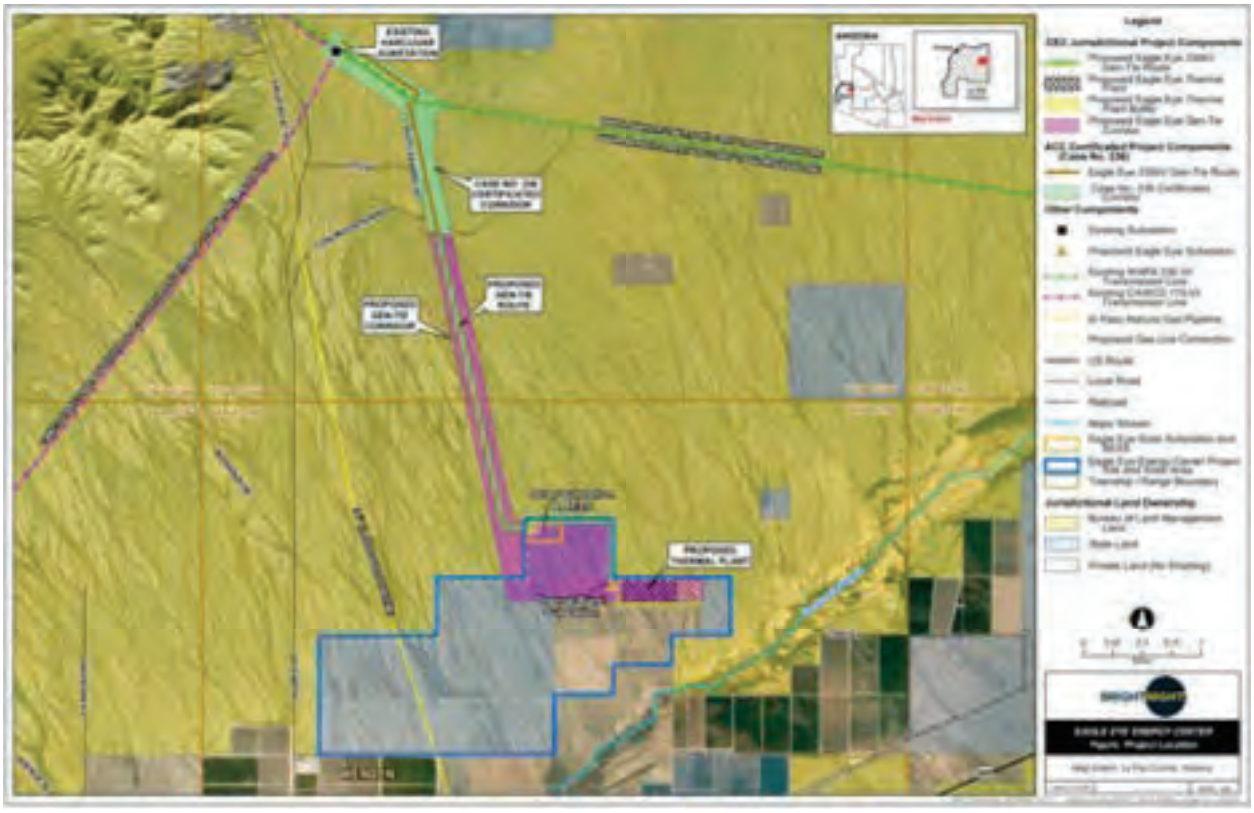

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Project Manager
280 Melba Rd
Encinitas, CA 92024
klamb@kpenvironmental.com
858 243-6575

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280 Melba
Encinitas, CA 92024
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CC:

Ms. Erika McCalvin
Planning & Project Manager
Fort McDowell Yavapai Nation
P.O. Box 17779
Fountain Hills, AZ 85269

May 12, 2026

Mr. Timothy Williams, Chairman
Fort Mojave Indian Tribe
500 Merriman Ave.
Needles, CA 92363

RE: Eagle Eye Thermal Plant and Gen-Tie Project
Tribal Consultation for the Certificate of Environmental Compatibility

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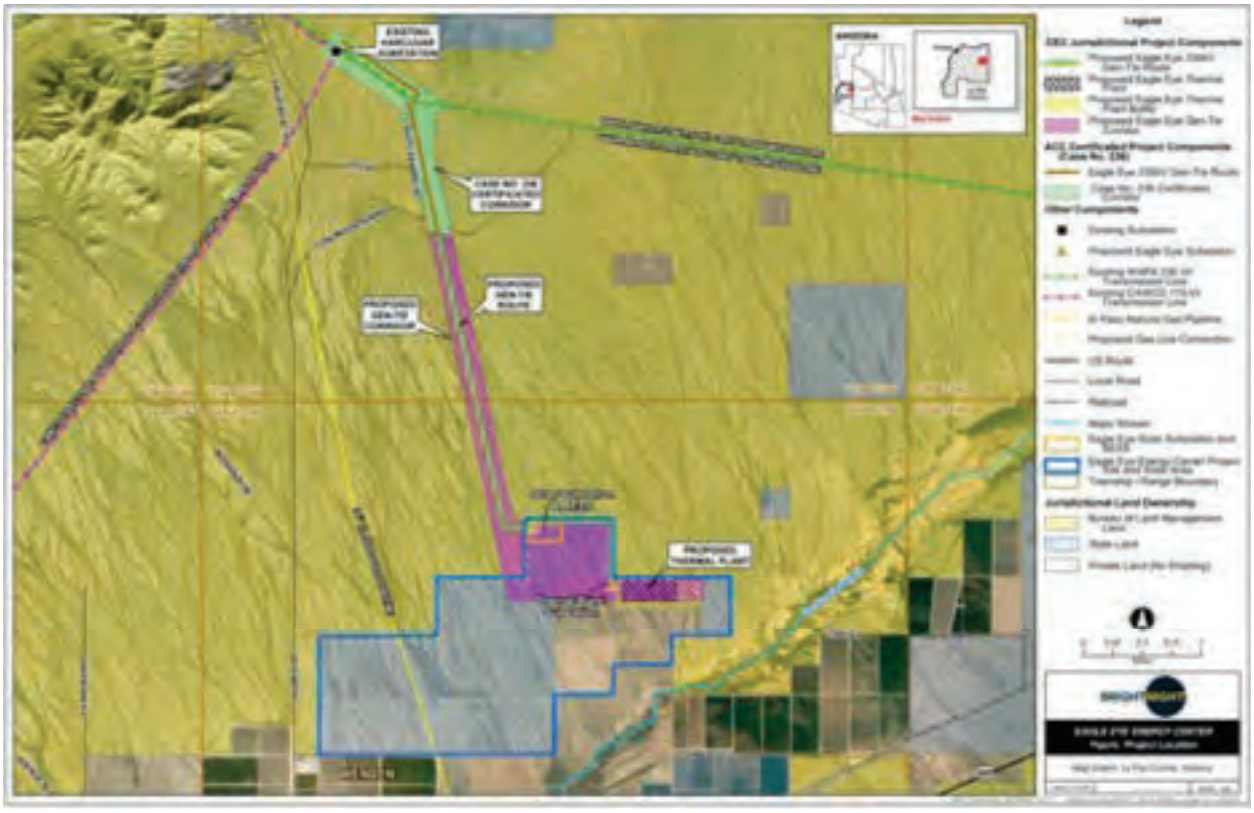

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CC:

Ms. Linda Otero
Director, AhaMakav Cultural Society
Fort Mojave Indian Tribe
P.O. Box 5990
Mohave Valley, AZ 86446

May 12, 2026

Mr. Jonathan Koteen
President
Fort Yuma-Quechan Tribe
executivesecretary@quechantribe.com

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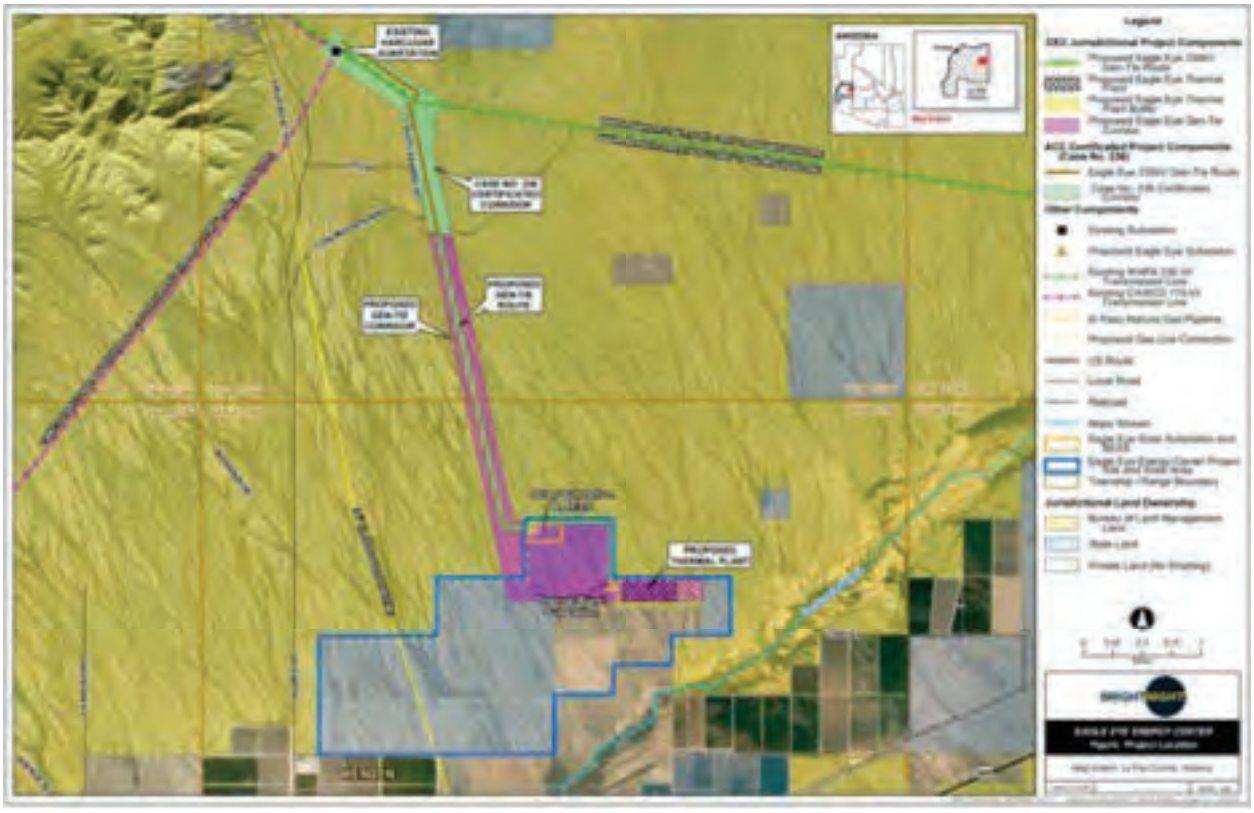

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CC:

H. Jill McCormick, M.A.
Historic Preservation Office
Fort Yuma-Quechan Tribe
P.O. Box 1899
Yuma , AZ 85366

May 12, 2026

Lamar Keevama, Chairman
P. O. Box 123
Kykotsmovi, AZ 86039

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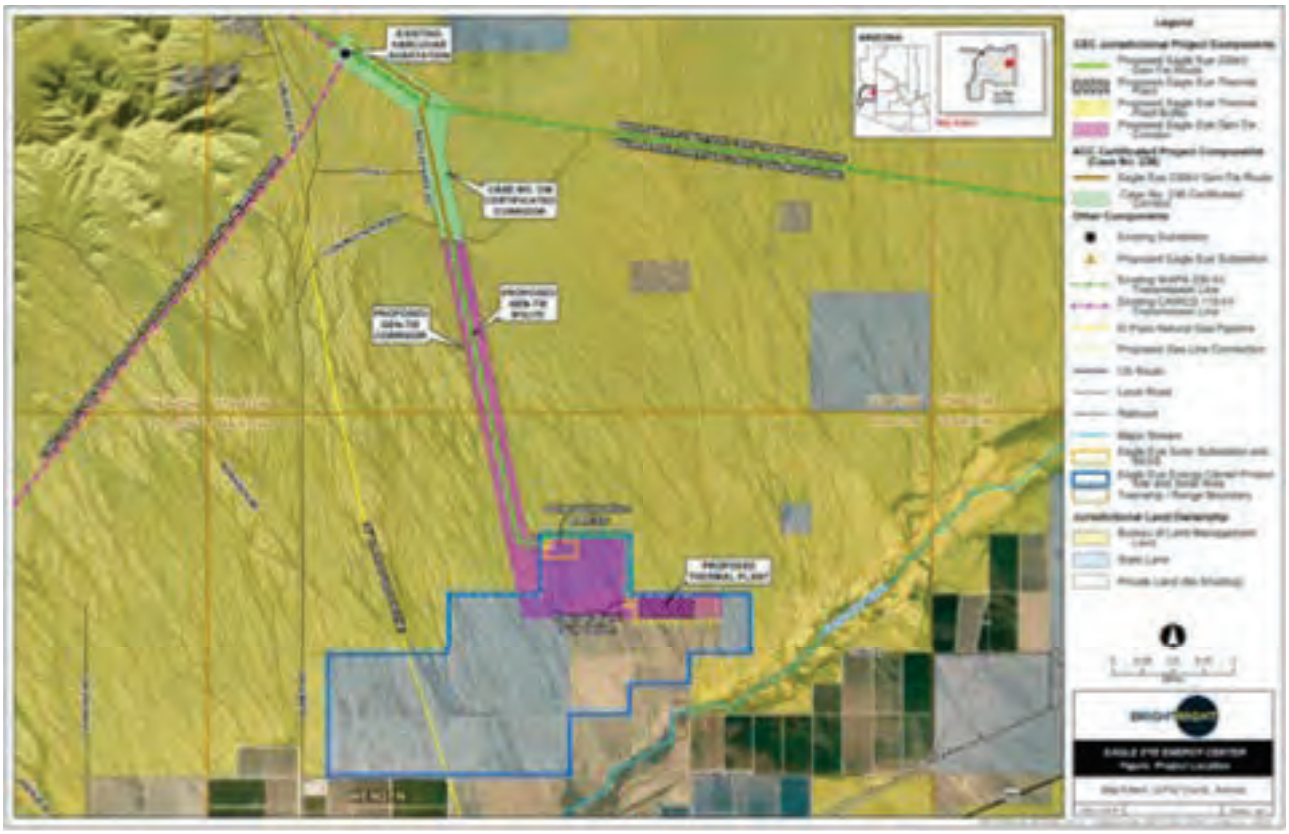

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Stewart Koyiyumptewa
Tribal Historic Preservation Officer
Hopi Tribe Cultural Preservation Office
P.O. Box 123
Kykotsmovi, AZ 86039

May 12, 2026

Thora Walsh Padilla
President
Mescalero Apache Tribe
P.O. Box 227
Mescalero, NM 88340

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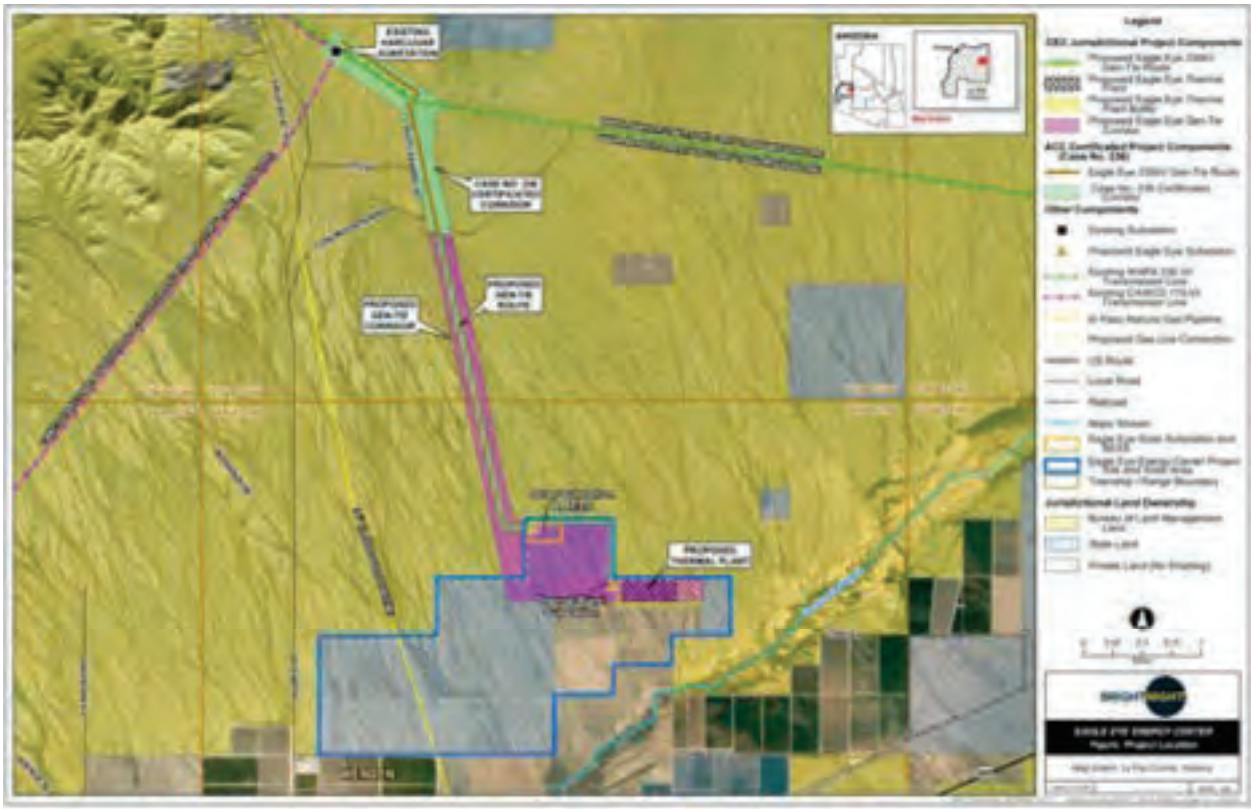

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Ms. Holly Houghten
Tribal Historic Preservation Officer
Mescalero Apache Tribe
P.O. Box 227
Mescalero, NM 88340

May 12, 2026

Mr. Julian Hernandez
Chairman
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, AZ 85746

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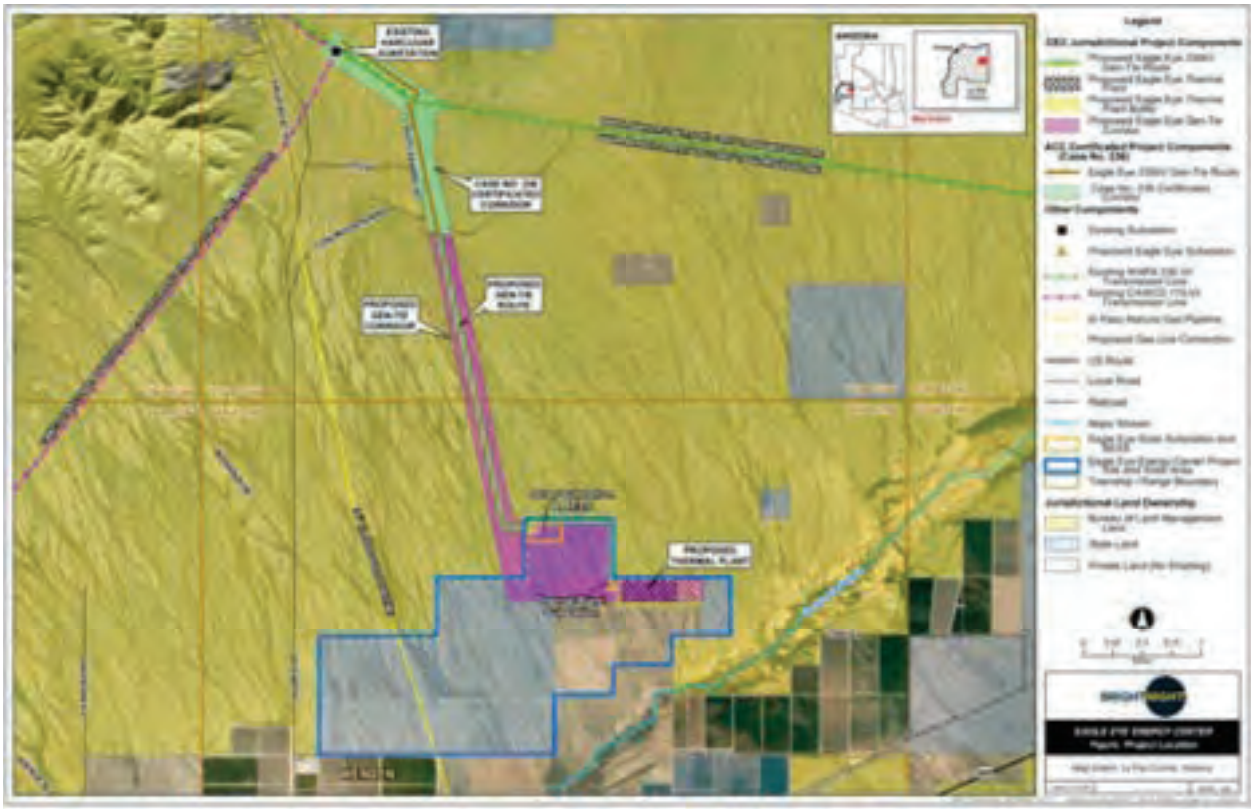

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Dr. Karl A. Hoerig
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757

May 12, 2026

Mr. Arden Kucate
Governor
Pueblo of Zuni
P. O. Box 339
Zuni, NM 87327

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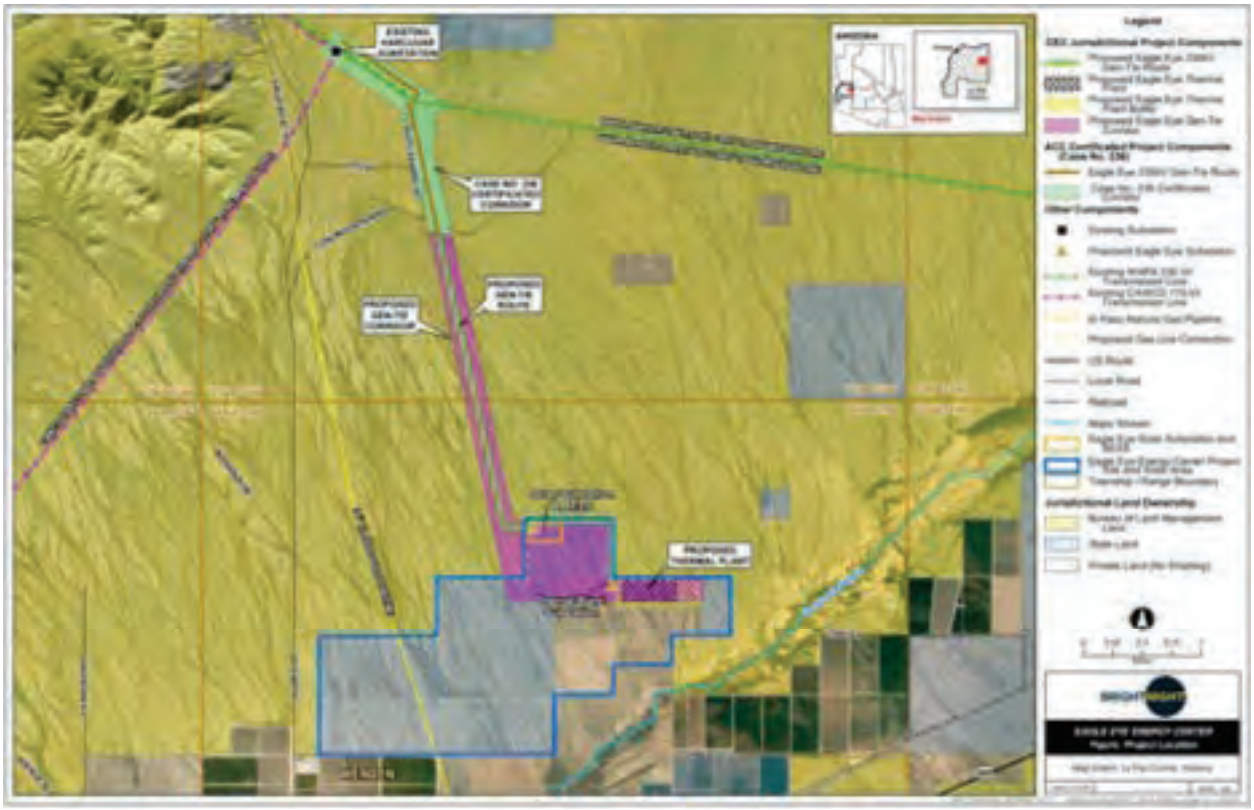


The Applicant is seeking a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Committee (ACC) for the Project. A CEC is required for the Project because it includes a Thermal Plant and the proposed transmission line voltage is above 115 kV and over 1-mile in length. The Applicant anticipates filing the CEC at the beginning of June 2026. The Applicant obtained the list of Tribes with claims in the Project area by consulting the Arizona State Historic Preservation Office (SHPO) Government-to-Government Consultation Toolkit. Consulting parties for this Project are the Arizona SHPO, the Ak-Chin Indian Community, the Chemehuevi Indian Tribe, the Colorado River Indian Tribes, Fort McDowell Yavapai Nation, the Fort Mojave Indian Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Yavapai Apache Nation, and the Yavapai Prescott Indian Tribe.

Cultural resource investigations have been conducted in the vicinity of the proposed Project. A Class I and three Class III cultural resource surveys have been conducted that cover the entirety of the proposed Thermal Plant Project site and Gen-tie. A Class I was conducted that covered the entire Energy Center and identified previous cultural surveys. Three Class III surveys have been completed and cover the Thermal Plant site and Gen-Tie Project. First, a Class III cultural resources inventory was conducted on BLM-administered land (Byszewski et al. 2025) that covered approximately 379 acres and covers the Gen-tie corridor. Second, a Class III cultural resources inventory was conducted on ASLD-administered land (Huntley and Turney 2026a) that covered approximately 289 acres and covers the Gen-tie corridor. Finally, a due diligence cultural resources inventory was conducted on private land (Huntley and Turney 2026b) that covered approximately 159 acres and includes the Thermal Plant site. The attached **Cultural Resources Memo for the Eagle Eye Energy Center and Gen-Tie Project** summarizes the results of the above surveys. This memo was prepared by Tetra Tech, the company that conducted and prepared these Class III surveys. As mentioned, we have attached the summary memo, and can provide the full Class III surveys upon request.

We are inquiring whether you have any concerns regarding cultural resources as well as any sites of traditional, religious, cultural, or historical importance to your community within the Project vicinity. The Applicant will be filing the CEC Application in mid-June, 2026 and hearings with the Arizona Power Plant and Transmission Line Siting Committee will start August 3, 2026. We would greatly appreciate your comments prior to filing our application by June 11, 2026. Please provide comments by mail, email or by phone at the information listed below:

Kaylan Lamb
Project Manager
280 Melba Rd
Encinitas, CA 92024
klamb@kpenvironmental.com
858 243-6575

Your correspondence will be included as part of the Project record that is filed with the ACC. All cultural resource locational information, including maps, will be redacted from any copies of the document available to the general public. If you have any further questions or would like to discuss this document, please do not hesitate to contact me.

Sincerely,

Kaylan Lamb
Project Manager
280 Melba
Encinitas, CA 92024
858 243-6575

CC:

Mr. Kurt Dongoske
Director, Tribal Historic Preservation Officer
kdongoske@gmail.com

From:	Ron Escobar
To:	Kaylan Lamb
Subject:	RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Thursday, May 28, 2026 8:02:15 AM
Attachments:	image004.png image007.png image008.png

[External]

Thank you

Ron Escobar
Director

Tribal Historic Preservation Office
Chemehuevi Indian Tribe
(760) 858-1126 x152

PO Box 1976
Havasu Lake, CA 92363

THPODir@cit-nsn.gov
www.Chemehuevi.org

From: Kaylan Lamb <klamb@kpenvironmental.com>
Sent: Wednesday, May 27, 2026 3:13 PM
To: Ron Escobar <THPODir@cit-nsn.gov>
Subject: RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

CAUTION EXTERNAL SENDER! This email is from outside the Chemehuevi Indian Tribe. Do not click links or open attachments unless you fully trust the sender. If anything looks suspicious, forward it immediately to it@cit-nsn.gov

Hi Ron,

The Class III Cultural Reports referenced in the Eagle Eye Thermal Plant and Gen-Tie Project (Project) Cultural Memorandum are available for your review at the following link: Tribal Confidential

Let me know if you have any issues accessing the files. Please note that these Class III reports cover a

larger area than the proposed Project, but together cover all components of the Project. The BLM Class III survey in particular covers the proposed Gen-Tie but references a previous solar project area on BLM land that is not included in the current proposed Energy Center. Refer to the Cultural Memorandum to clarify which areas are included in the proposed Project.

Let us know if you have any questions or would like to discuss further.

Thank you,
Kaylan

Kaylan Lamb, Associate Environmental Planner
858.215.4286
klamb@kpenvironmental.com
www.kpenvironmental.net

From: Ron Escobar <THPODir@cit-nsn.gov>
Sent: Tuesday, May 26, 2026 1:32 PM
To: Kaylan Lamb <klamb@kpenvironmental.com>
Subject: RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

[External]

Hi Kaylan,
Once I review the Class III Cultural Report, if I see anything I will respond to the Report.
Respectfully,

Ron Escobar
Director

Tribal Historic Preservation Office
Chemehuevi Indian Tribe
(760) 858-1126 x152

PO Box 1976
Havasu Lake, CA 92363

THPODir@cit-nsn.gov
www.Chemehuevi.org

From: Kaylan Lamb <klamb@kpenvironmental.com>
Sent: Tuesday, May 26, 2026 12:19 PM
To: Ron Escobar <THPODir@cit-nsn.gov>
Subject: RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

CAUTION EXTERNAL SENDER! This email is from outside the Chemehuevi Indian Tribe. Do not click links or open attachments unless you fully trust the sender. If anything looks suspicious, forward it immediately to it@cit-nsn.gov

Hi Ron,

Thank you for your email and comments. I will forward this to the team for their review and consideration.

Thank you!
Kaylan

Kaylan Lamb, Project Manager
858.215.4286
klamb@kpenvironmental.com
www.kpenvironmental.net

From: Ron Escobar <THPODir@cit-nsn.gov>
Sent: Tuesday, May 26, 2026 8:15 AM
To: Kaylan Lamb <klamb@kpenvironmental.com>
Subject: RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

[External]

Good morning Kaylan,
Thank for meeting with me last week concerning the Eagle Eye Thermal Plant and Gen-Tie Project in La Paz County, Arizona. The Chemehuevi Tribe is interested in helping to provide tribal monitors for these Projects. We are requesting a Tribal Participation Plan be developed to allow interested tribes to participate in the development of these Projects.
Thank you very much for your time and consideration to our request.

Ron Escobar

Director

Tribal Historic Preservation Office
Chemehuevi Indian Tribe
(760) 858-1126 x152

PO Box 1976
Havasu Lake, CA 92363

THPODir@cit-nsn.gov
www.Chemehuevi.org

From: Kaylan Lamb <klamb@kpenvironmental.com>
Sent: Wednesday, May 13, 2026 7:57 AM
To: Ron Escobar <THPODir@cit-nsn.gov>
Cc: Daniel Leivas <chairman@cit-nsn.gov>
Subject: RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

CAUTION EXTERNAL SENDER! This email is from outside the Chemehuevi Indian Tribe. Do not click links or open attachments unless you fully trust the sender. If anything looks suspicious, forward it immediately to it@cit-nsn.gov

Good morning Ron,

Thank you for your response. We are glad to have a virtual meeting to discuss the Project further with the Chemehuevi THPO Department. Can you please provide a few available time frames for a meeting next week?

Thank you,
Kaylan

Kaylan Lamb, Project Manager
858.243.6575
klamb@kpenvironmental.com
www.kpenvironmental.net

From: Ron Escobar <THPODir@cit-nsn.gov>
Sent: Wednesday, May 13, 2026 7:59 AM

From:	Ron Escobar
To:	Kaylan Lamb
Cc:	Daniel Leivas
Subject:	RE: [EXTERNAL] Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Wednesday, May 13, 2026 7:59:42 AM
Attachments:	image005.png image007.png

[External]

Good morning Kaylan,
The Chemehuevi THPO Department would like to better understand this area location for the Eagle Eye and Gen-Tie Project.
Let me know if we can have a virtual meeting.

Respectflly,

Ron Escobar
Director

Tribal Historic Preservation Office
Chemehuevi Indian Tribe
(760) 858-1126 x152

PO Box 1976
Havasu Lake, CA 92363

THPODir@cit-nsn.gov
www.Chemehuevi.org

CAUTION EXTERNAL SENDER! This email is from outside the Chemehuevi Indian Tribe. Do not click links or open attachments unless you fully trust the sender. If anything looks suspicious, forward it immediately to it@cit-nsn.gov

From:	Eiselt, Sunday
To:	Kaylan Lamb; Anton, Shane; Angela.garcia-lewis@srpmic-ns.gov; Martinez, Martha; Lewis, April
Subject:	Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Wednesday, May 13, 2026 8:26:10 AM
Attachments:	image001.png image003.png Outlook-fchq2cpf.png

[External]

Received. Thank you.

B. Sunday Eiselt
THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

From: Eiselt, Sunday
To: Kaylan Lamb; Anton, Shane; Angela.garcia-lewis@srpmic-ns.gov; Martinez, Martha; Lewis, April
Subject: RE: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date: Tuesday, June 2, 2026 3:56:47 PM
Attachments: image004.png
image005.png
image007.png

You don't often get email from sunday.eiselt@srpmic-nsn.gov. Learn why this is important

[External]

Good afternoon. The SRPMIC THPO has reviewed your consultation documents dated May 12, 2026. Tetra Tech conducted three cultural resources surveys for other projects that in total covered the entirety of the proposed Project Area. The pedestrian surveys documented no archaeological sites and documented 24 isolated finds. The isolates indicate a range of activities, including prehistoric hunting and possible food preparation or resource procurement, as well as historic food consumption and refuse dumping. Tetra Tech submits that thorough in-field documentation of the 24 isolates has exhausted their information potential (Criterion D) and that they are not eligible for listing in the NRHP under any of the other eligibility criteria. Thus, no additional management recommendations are necessary. The SRPMIC THPO concurs.

Thank you for consulting with the SRPMIC THPO.

B. Sunday Eiselt
THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

From:	jroth@azstateparks.gov on behalf of AZSHPO - AZPARKS
To:	Kaylan Lamb
Cc:	Caroline Klebacha
Subject:	Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Monday, June 8, 2026 8:58:08 AM
Attachments:	image001.png image002.png image003.png image004.png State Parks Logo 2024 - sml.png

[External]

Received...Thank You.

Please note that we work in order of receipt of each project (as received in the azshpo inbox). Unless an existing agreement says otherwise, SHPO is mandated a 30 calendar-day review for federal projects, and a 30 business-day review for state projects. Please do not reach out asking for an update prior to the close of review time.

Arizona State Historic Preservation Office

On Fri, Jun 5, 2026 at 8:13 AM Caroline Klebacha <cklebacha@azstateparks.gov> wrote:

> Hi!
>
> Can you pull the three reports from this file?
>
> Thanks!
>
> **Caroline Klebacha, M.A.**
> **Archaeology Compliance Specialist**
> **State Historic Preservation Office**
> **1110 West Washington Street, Suite 100**
> **Phoenix, AZ 85007-2957**
> **Phone: 602-542-7140**
> **Email: cklebacha@azstateparks.gov**
> **Web: http://AZStateParks.com/SHPO**
>
> ***Please use azshpo@azstateparks.gov for initial consultation!***
>
> ARIZONA STATE PARKS & TRAILS
>
> ---------- Forwarded message ---------
> From: **Kaylan Lamb** <klamb@kpenvironmental.com>
> Date: Thu, Jun 4, 2026 at 9:37 PM
> Subject: Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
> To: Caroline Klebacha <cklebacha@azstateparks.gov>
>
> Hi Caroline,

Great, I have provided access to AZSHPO@azstateparks.gov to the following SharePoint folder: Tribal Confidential

This folder contains the three **confidential** Class III Reports as well as the Cultural Memorandum summarizing the reports. Let me know if you have any issues accessing the files. Please note that these Class III reports cover a larger area than the proposed Project, but together cover all components of the Project. The BLM Class III survey in particular covers the proposed Gen-Tie but references a previous solar project area on BLM land that is not included in the current proposed Energy Center. Refer to the Cultural Memorandum to clarify which areas are included in the proposed Project.

Let us know if you have any questions or would like to discuss further.

Thank you,

Kaylan

Kaylan Lamb, Project Manager

858.215.4286

klamb@kpenvironmental.com

www.kpenvironmental.net

From: Caroline Klebacha <cklebacha@azstateparks.gov>
Sent: Thursday, June 4, 2026 3:35 PM
To: Kaylan Lamb <klamb@kpenvironmental.com>
Subject: Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

[External]

Our admin will pull them down for us, so that should work fine.

Caroline

Caroline Klebacha, M.A.

Archaeology Compliance Specialist
State Historic Preservation Office
1110 West Washington Street, Suite 100
Phoenix, AZ 85007-2957
Phone: 602-542-7140
Email: cklebacha@azstateparks.gov
Web: http://AZStateParks.com/SHPO

Please use azshpo@azstateparks.gov for initial consultation!

ARIZONA STATE PARKS & TRAILS

On Thu, Jun 4, 2026 at 2:58 PM Kaylan Lamb <klamb@kpenvironmental.com> wrote:

> Good Afternoon Caroline,
>
> The Class III reports are available for review via a secured SharePoint site due to large file size. I can provide access to AZSHPO@azstateparks.gov as well as your email. Are there any other personnel that should be granted access for review?
>
> Thank you,
>
> Kaylan

kp environmental

Kaylan Lamb, Project Manager

858.215.4286

klamb@kpenvironmental.com

www.kpenvironmental.net

From: Caroline Klebacha <cklebacha@azstateparks.gov>
Sent: Thursday, June 4, 2026 2:54 PM
To: Kaylan Lamb <klamb@kpenvironmental.com>
Subject: Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility

[External]

From:	Caroline Klebacha
To:	Kaylan Lamb
Subject:	Re: Eagle Eye Thermal Plant and Gen-Tie Project Tribal Consultation for the Certificate of Environmental Compatibility
Date:	Wednesday, June 10, 2026 1:44:32 PM
Attachments:	image001.png image002.png image003.png image004.png State Parks Logo 2024 - sml.png 2024-0143(187585)-ACC(Eagle Eye Thermal Plant and Gen-Tie)-NHPI.pdf

[External]

Good afternoon,

Please see SHPO's response below.

Sincerely,

Caroline Klebacha, M.A.
Archaeology Compliance Specialist
State Historic Preservation Office
1110 West Washington Street, Suite 100
Phoenix, AZ 85007-2957
Phone: 602-542-7140
Email: cklebacha@azstateparks.gov
Web: http://AZStateParks.com/SHPO

Please use azshpo@azstateparks.gov for initial consultation!

On Mon, Jun 8, 2026 at 10:16 AM AZSHPO - AZPARKS <azshpo@azstateparks.gov> wrote:

> SHPO-2024-0143 (187585) - - SEE NOTES
>
> Files uploaded to PROJECT folder at
>
> **NOTES:**
> Two of these reports (not ASLD land) were previously submitted under BLM consultation
>
> Class III Cultural Resources Survey BrightNight Eagle Eye Solar Project La Paz County, Arizona - August 2025
> Submitted under Correspondence # 182696
>
> Draft Due Diligence Cultural Resources Inventory Eagle Eye Energy Center Project, Private Land, La Paz County, Arizona - Jan 2026
> Submitted under Correspondence # 186515
>
> ---------- Forwarded message ---------
> From: **Caroline Klebacha** <cklebacha@azstateparks.gov>

Temp Number	Isolate Type	Cultural Affiliation	Time Period
BN2-JS-IF-56	Hole-in-top can	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-57	1) Hole-in-top can n=47; 2) Sanitary cans n=9; 3) Rectangular crushed meat tin; 4) Glass clear condiment jar, screw top; 5) Crushed hinge lid tobacco tin	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-58	Hole-in-top cans n=2	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-59	1) Hole-in-top cans n=2; 2) Hole-in-cap can; 3) Sanitary can; 4) Clear glass bottle fragment	Euro-American	Late Historic–Recent (A.D. 1900–Present) (Rock 1993)
BN2-JS-IF-60	Tizon Brown Ware jar/olla body sherd	Native American	Prehistoric-Protohistoric (A.D.700-A.D.-1890) (NAU 2001)

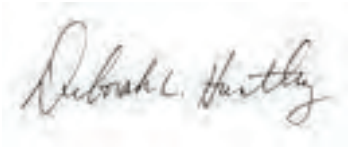
A.D. = Anno Domini; B.C. = Before Christ

NRHP Eligibility and Management Recommendations

Per the *ASM Archaeological Site Recording Manual* (1993), Tetra Tech recommends that all 24 isolates are not eligible for listing in the NRHP. Tetra Tech submits that thorough in-field documentation of the 24 isolates has exhausted their information potential (Criterion D) and that they are not eligible for listing in the NRHP under any of the other eligibility criteria. Thus, no additional management recommendations are necessary. The ASLD, BLM, and SHPO have concurred with these recommendations.

If you have any questions or require additional information, please feel free to call me at 720.340.9474.

Sincerely,



Deborah L. Huntley, PhD, RPA
Principal Archaeologist – Southwest

Deborah.Huntley@tetratech.com

No historic properties impacted. The project area has been surveyed in it's entirety. None of the isolated occurrences recorded are eligible for inclusion in the National Register. No further work is required.

Caroline Klebacha, M.A.
Arizona State Historic Preservation Office
June 10, 2026

EXHIBIT F
RECREATIONAL PURPOSES AND ASPECTS

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

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

Existing Conditions

Regional recreation information near the Eagle Eye Thermal Plant and Gen-Tie Project (Project) was gathered from La Paz County. La Paz County, located in central-western Arizona, spans 4,513 square miles and borders the Colorado River. Located in the north-central portion of the Sonoran Desert, La Paz County features diverse landscapes ranging from arid to lush desert environments, with elevations varying from 180 feet above sea level (amsl) along the Colorado River to 5,681 feet amsl at the summit of Harquahala Mountain. The Bureau of Land Management (BLM) oversees more than 55% of the total land area in La Paz County, primarily for recreational use (La Paz, 2025). Notable recreational assets to the La Paz County include the Colorado River, the Arizona Peace trail, a 650-mile off-highway vehicle trail system that spans La Paz, Yuma, and Mohave counties, and Lake Alamo State Park.

As shown on **Figure F-1**, there are no designated recreational facilities within one mile of the Project. Recreational activities associated with the surrounding area of the Project are described in detail below.

The BLM land surrounding the Project site is designated as Off-Highway Vehicle (OHV) Area (Limited). Limited OHV areas restrict vehicles to designated roads and trails. The limited designation of this OHV area means that any recreational activity is limited to the existing designated trails. There is a 4-Wheel Drive Trail located northeast of the Thermal Plant, but no trails intersect directly with the Project.

The BLM managed Harcuvar Mountains Wilderness Area comprises approximately 25,000 acres and is located approximately one mile northeast of the existing Harcuvar Substation. The Harcuvar Mountains contain a diverse population of plant and wildlife life communities, including desert bighorn sheep, desert tortoise, cougar, golden eagles, and various hawks (BLM, 2026a). The recreational activities associated with the wilderness area include hiking, backpacking, hunting and climbing.

The BLM managed Harquahala Mountains Wilderness is southeast of the Project and the Harquahala Mountain Trailhead is located approximately 5 miles southeast of the Project (BLM, 2026b).

Additional recreational facilities that are within the vicinity of the Project include the Morenga Palms RV Park, located approximately 2.8 miles south of the Project.

Potential Effects

The Project site will not be available for public recreation purposes, but it will not preclude recreational uses in the surrounding area. The OHV area and trails and the Harcuvar Mountains Wilderness Area will not be impacted by the development of the Project.

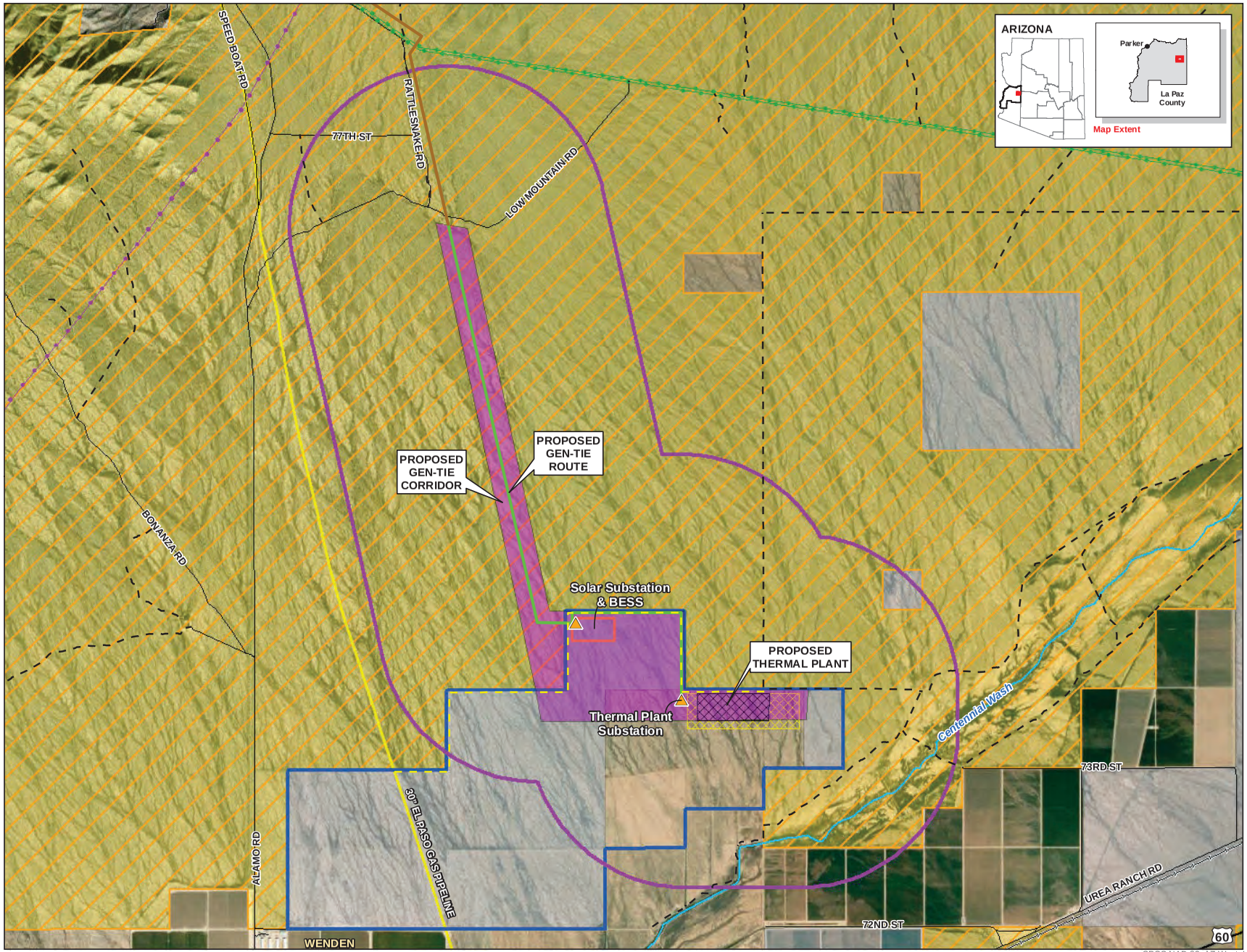
The Applicant will work with the BLM and La Paz County throughout the development of the Project to remain consistent with the County's Comprehensive Plan (La Paz County, 2025).

References

BLM. 2026a. Harcuvar Mountains Wilderness. Accessed May 2026. Available at: https://www.blm.gov/visit/harcuvar-mountains-wilderness

BLM. 2026b. Harquahala Mountains Wilderness. Accessed May 2026. Available at: https://www.blm.gov/visit/harquahala-mountains-wilderness

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=



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
- 1-Mile Buffer of Eagle Eye Gen-Tie Route and Thermal Plant

Recreation

- 4-Wheel Drive Trail
- Off-Highway Vehicle Area (Limited)

Other Components

- 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

Jurisdictional Land Ownership

- Bureau of Land Management Land
- State Land
- Private Land (No Shading)

0 0.25 0.5 0.75 1
Miles

BRIGHTNIGHT

EAGLE EYE THERMAL PLANT AND GEN-TIE PROJECT

Figure F-1 Recreation

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 G
CONCEPTS OF TYPICAL FACILITIES

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

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

Figure G-1: Detailed Site Plan

Figure G-2: Project Rendering

Figure G-3: Double-Circuit 230 kilovolt (kV) Single-Pole, Braced-Post

Figure G-4: Double-Circuit 230 kV Single-Pole, Davit-Suspension-Angle

Figure G-5: Double-Circuit 230 kV Single-Pole, Davit-Suspension-Tangent

Figure G-6: Double-Circuit 230 kV Single-Pole, DE-Davit-Angle

Figure G-7: Double-Circuit 230 kV Single-Pole, DE-Davit-Angle-Vertical-V1

Figure G-8: Double-Circuit 230 kV Single-Pole, DE-Davit-Angle-Vertical-V2

Figure G-9: Double-Circuit 230 kV Single-Pole, DE-Davit-Inline

Figure G-10: Double-Circuit 230 kV Single-Pole, DE-Vertical

Figure G-11: Double-Circuit 230 kV Double-Pole, DE-Vertical

Figure G-12: Double-Circuit 230 kV Single-Pole, Post

Figure G-13: Double-Circuit 230 kV Single-Pole, Vertical-Braced-Post-V1

Figure G-14: Double-Circuit 230 kV Single-Pole, Vertical-Braced-Post-V2

Figure G-15: Single-Circuit 230 kV Single-Pole, DE-Delta-Davit

Figure G-16: Single-Circuit 230 kV Single-Pole, Delta-Braced-Post

Figure G-17: Single-Circuit 230 kV Single-Pole, Delta-Davit-Suspension

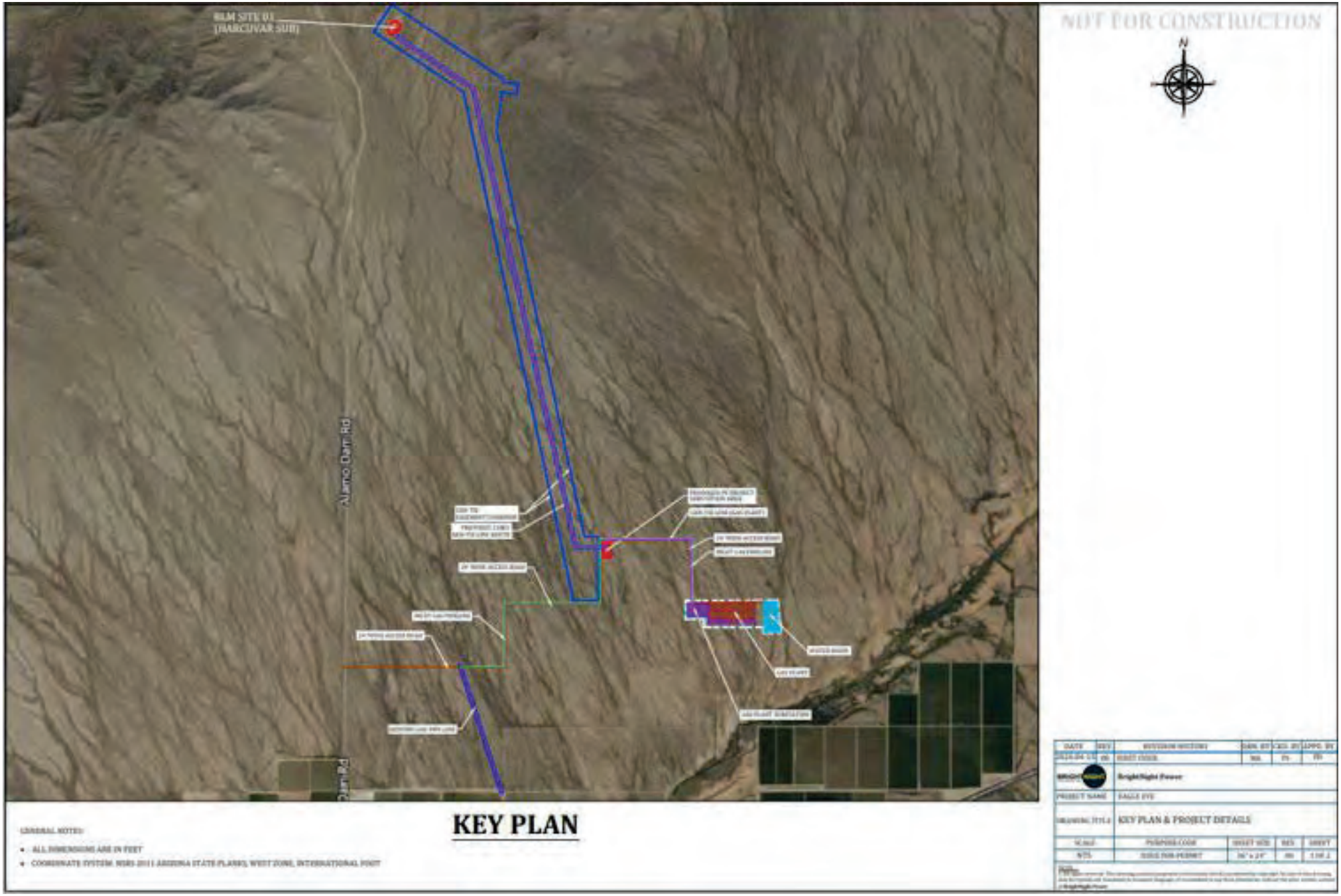
Figure G-18: Single-Circuit 230 kV Single-Pole, Delta-Post

Figure G-19: Single-Circuit 230 kV Single-Pole, DE-Vertical

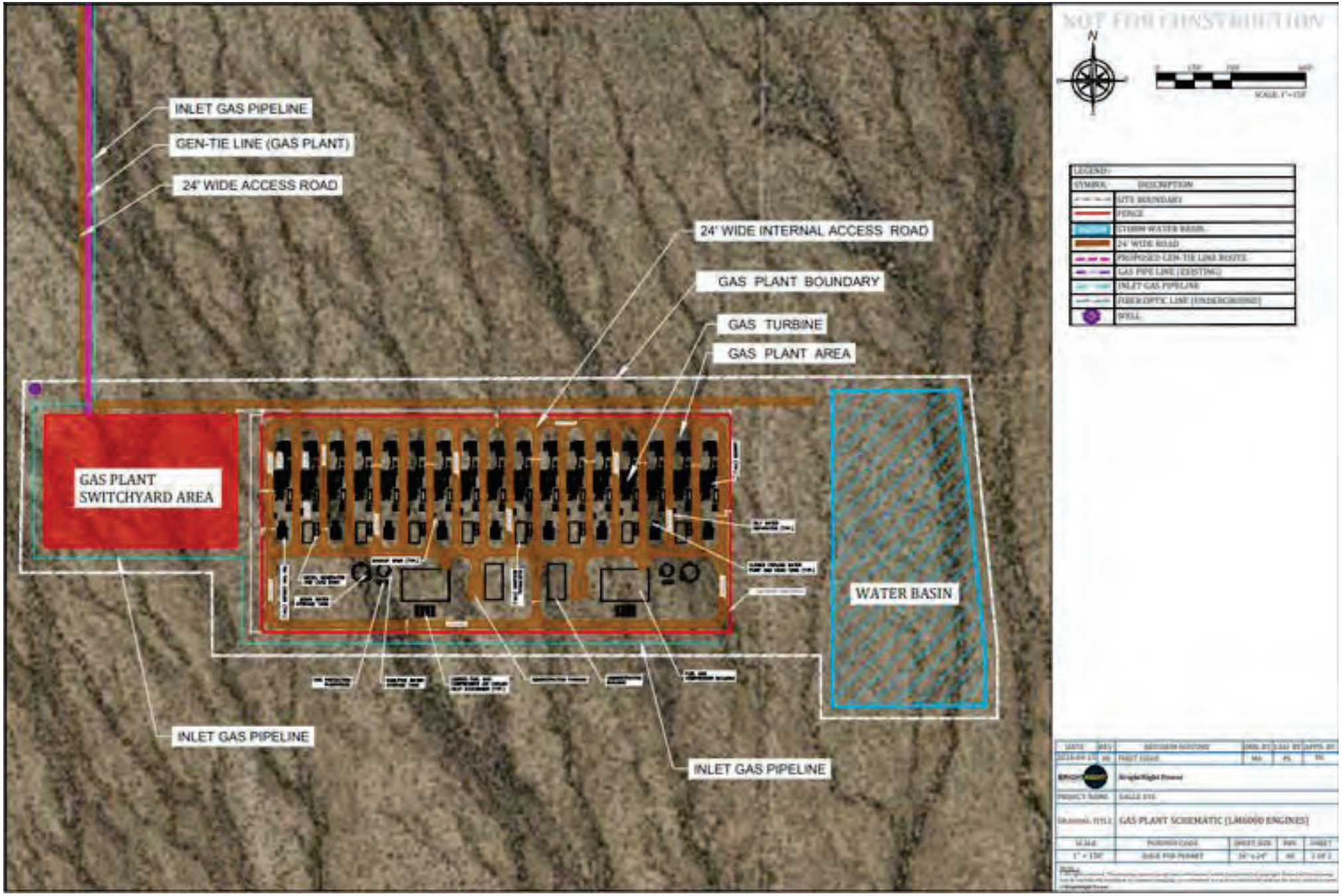
Figure G-20: Single-Circuit 230 kV Single-Pole, DE-Vertical-Davit

Figure G-1

Detailed Site Plan



Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G



Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G

Figure G-2

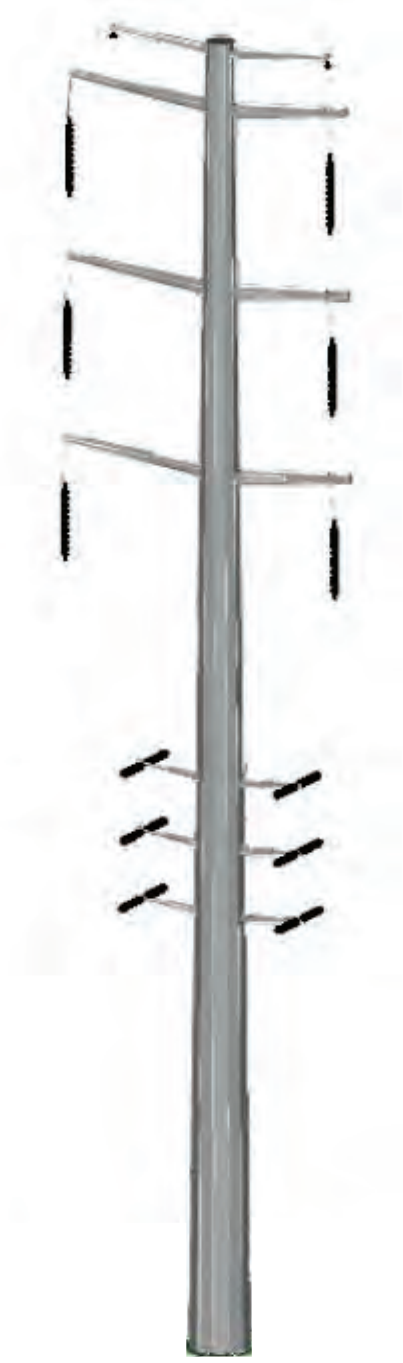
Project Rendering

Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G

Figure G-3

Double Circuit 230 kV Single-Pole, Braced-Post

Figure G-4

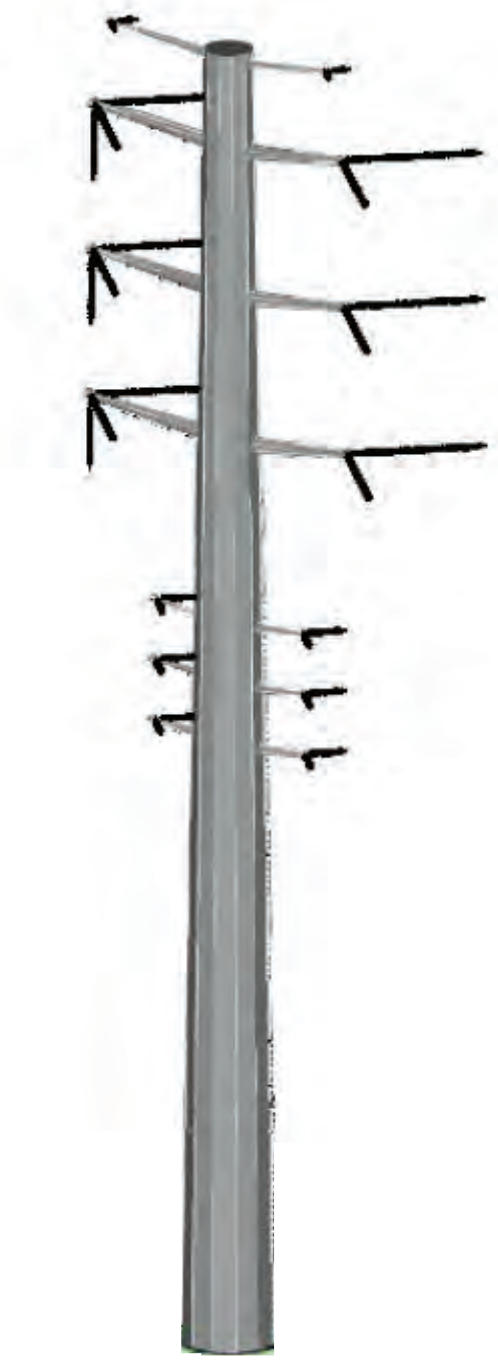


Double Circuit 230 kV Single-Pole, Davit-Suspension-Angle

Figure G-5

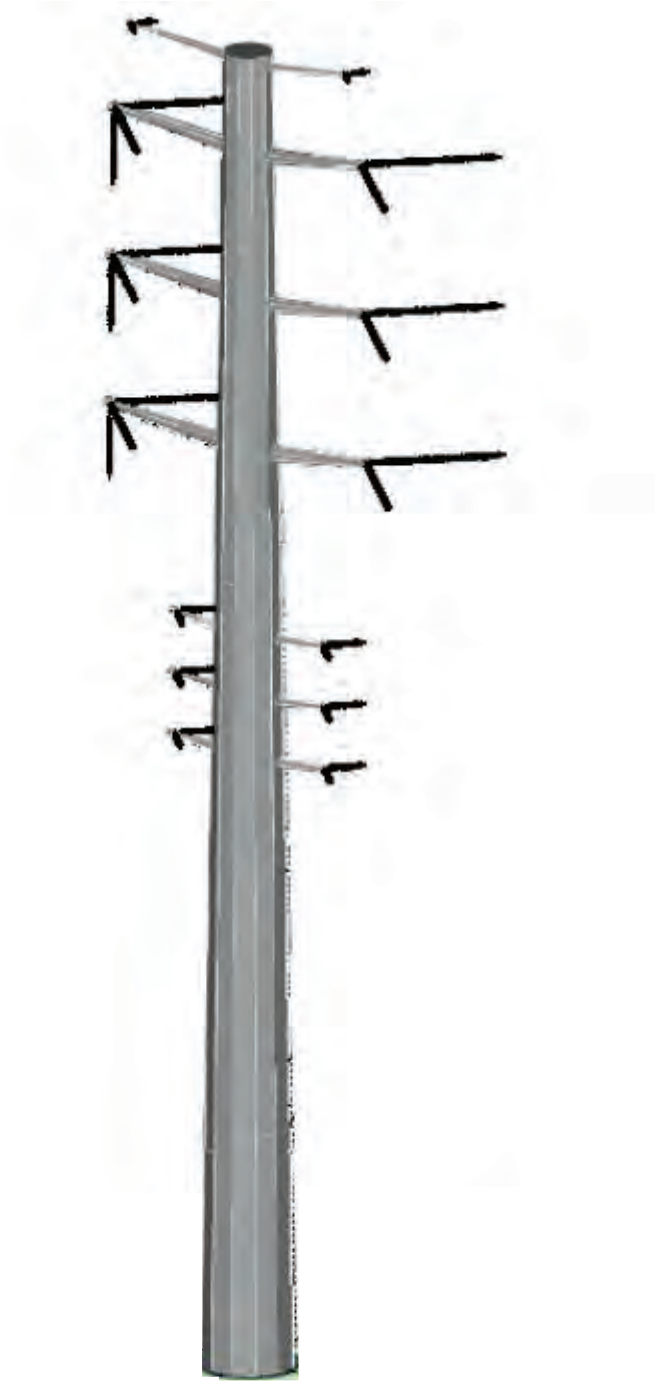
Double Circuit 230 kV Single -Pole, Davit-Suspension-Tangent

Figure G-6



Double Circuit 230 kV Single-Pole, DE-Davit-Angle

Figure G-7



Double Circuit 230 kV Single-Pole, DE-Davit-Angle-Vertical-V1

Figure G-8

Double Circuit 230 kV Single-Pole, DE-Davit-Angle-Vertical-V2

Figure G-9

Double Circuit 230 kV Single-Pole, DE-Davit-Inline

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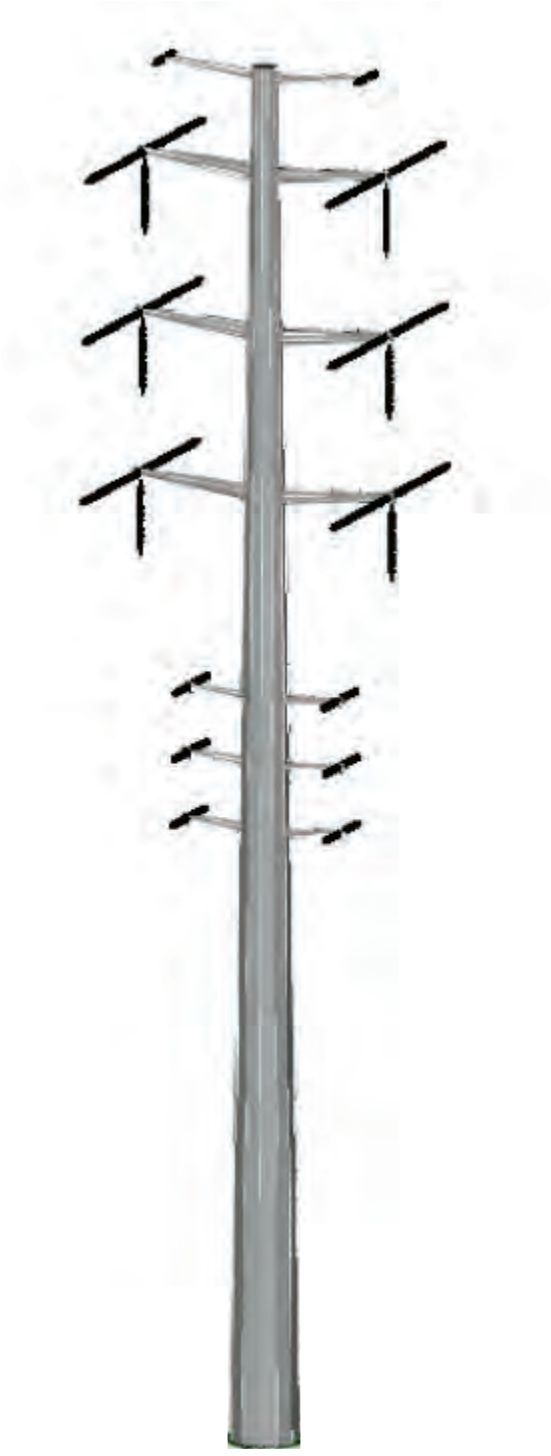
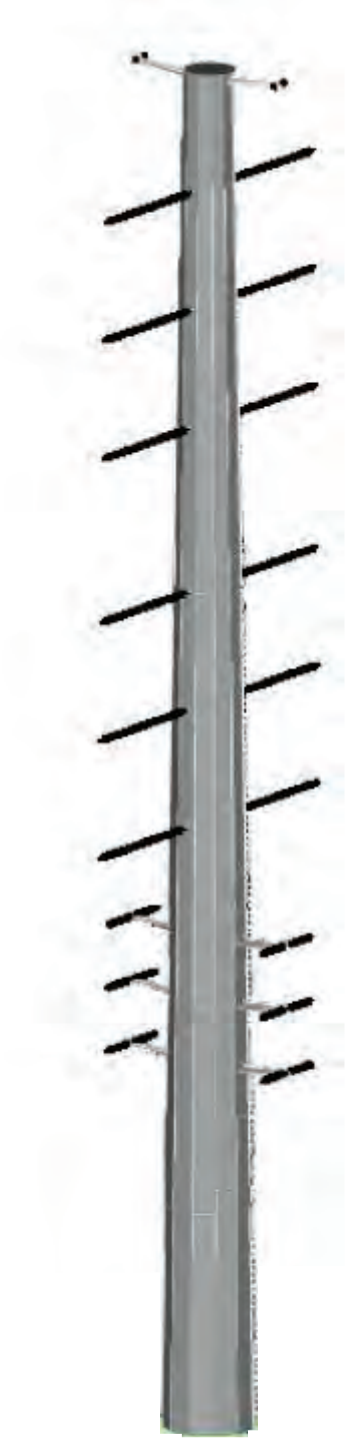
Figure G-10



Double Circuit 230 kV Single-Pole, DE-Vertical

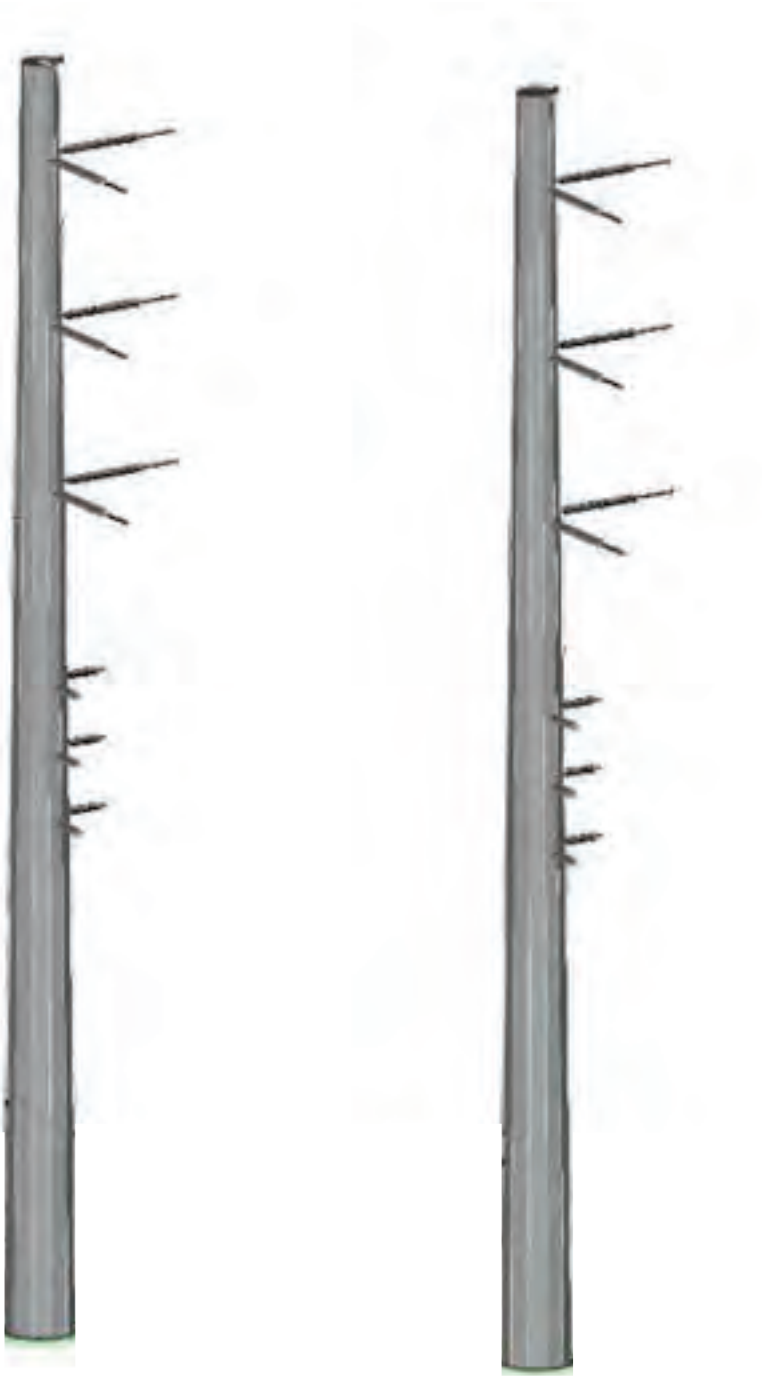
Figure G-11



Double Circuit 230 kV Double-Pole, DE-Vertical

Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G

Figure G-12

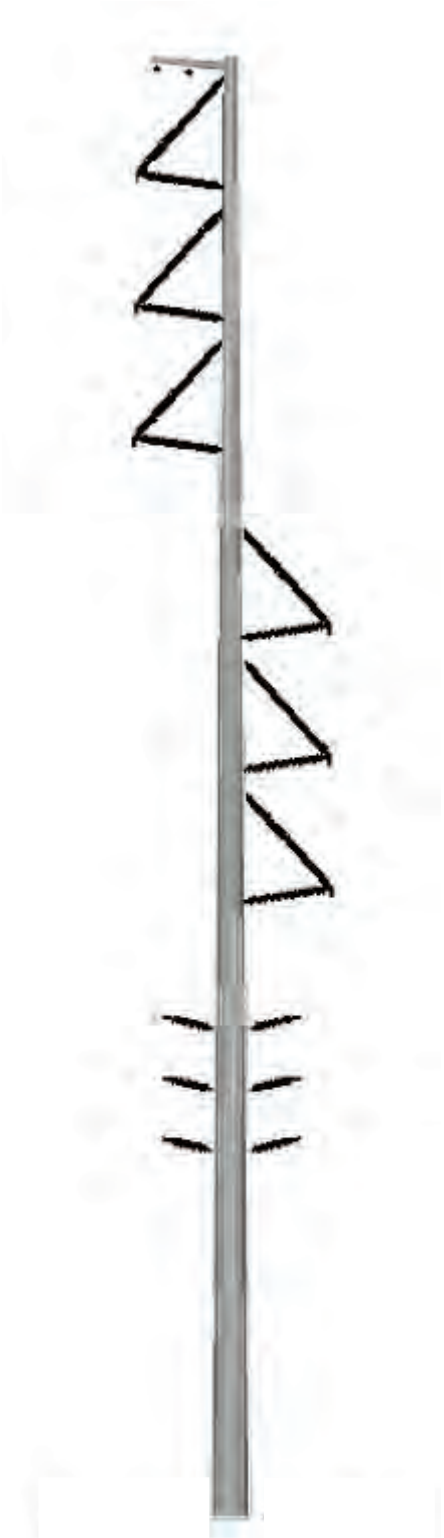


Double Circuit 230 kV Single-Pole, Post

Figure G-13

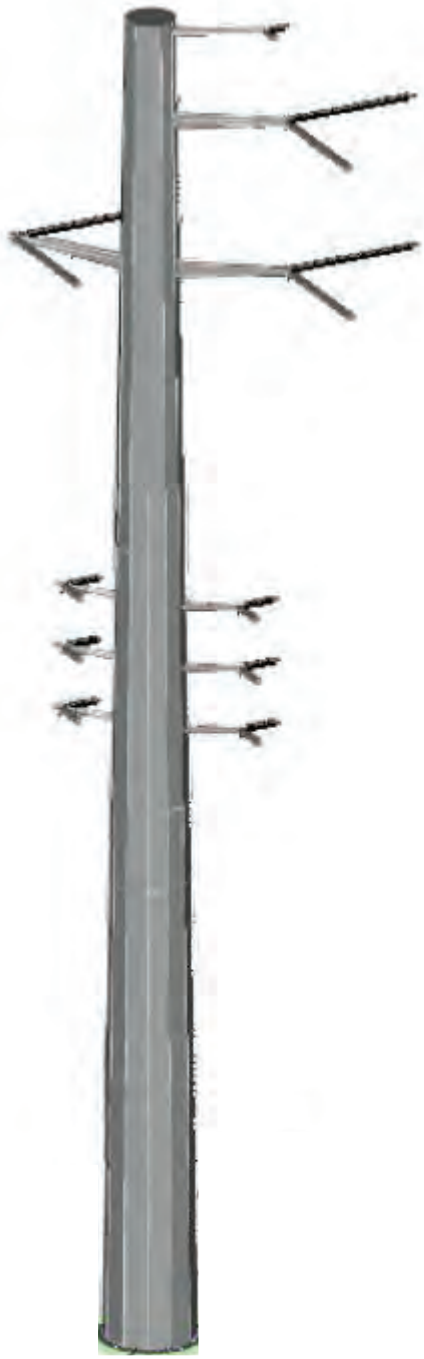
Double Circuit 230 kV Single-Pole, Vertical-Braced-Post-V1

Figure G-14



Double Circuit 230 kV Single-Pole, Vertical-Braced-Post-V2

Figure G-15



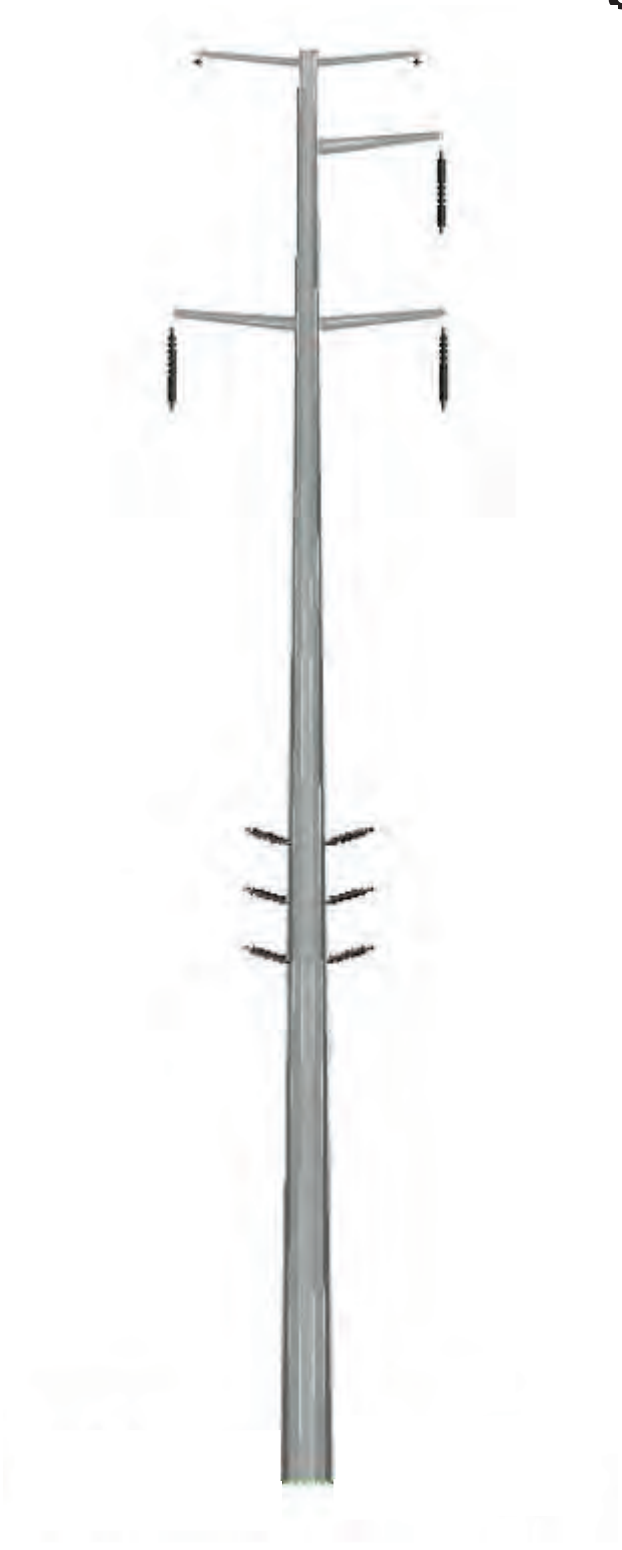
Single Circuit 230 kV Single-Pole, DE-Delta-Davit

Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G

Figure G-16

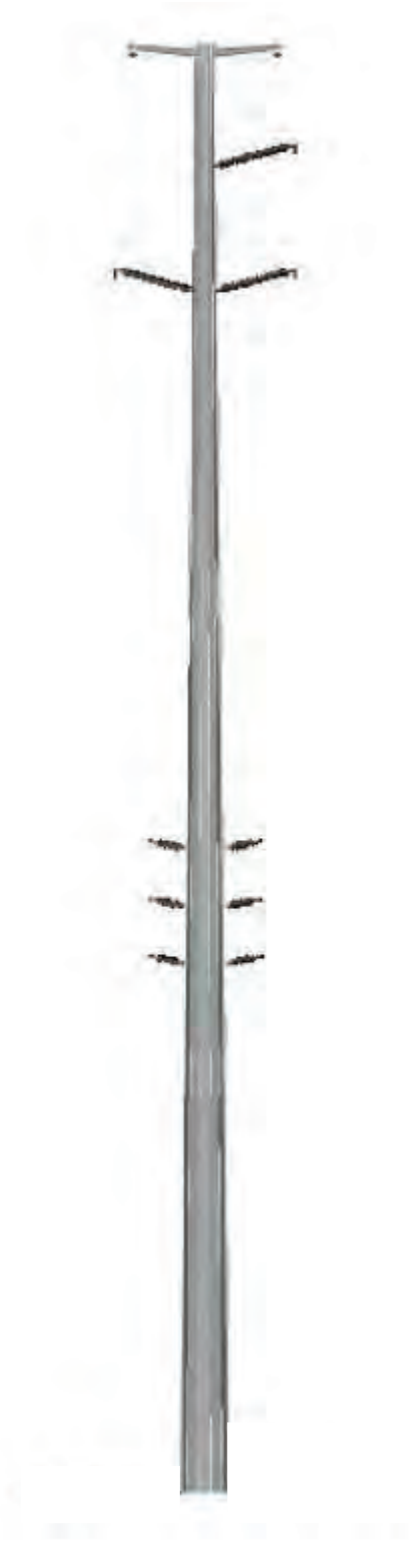
Single Circuit 230 kV Single-Pole, Delta-Braced-Post

Figure G-17



Single Circuit 230 kV Single-Pole, Delta-Davit-Suspension

Figure G-18

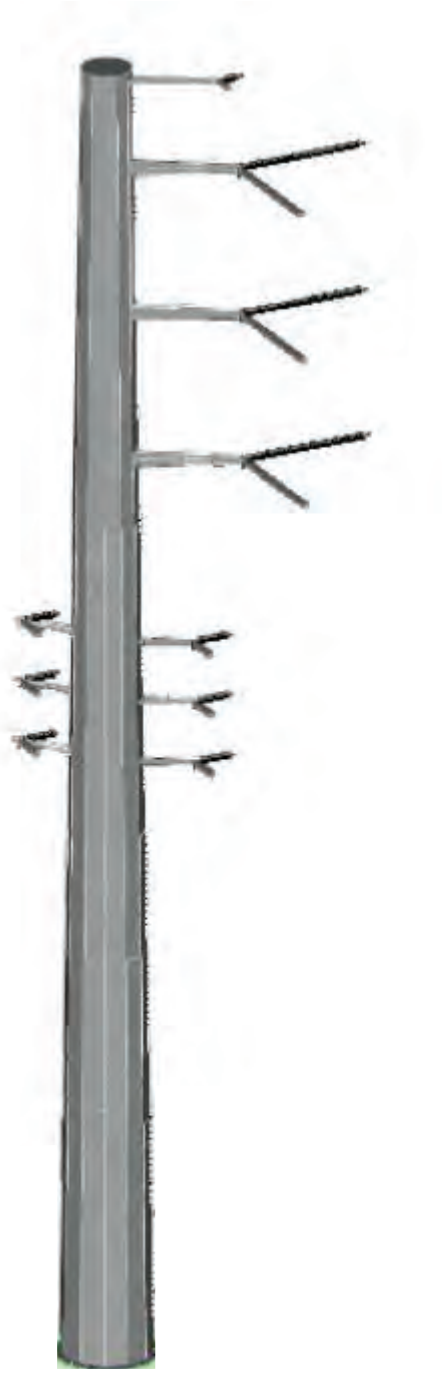


Single Circuit 230 kV Single-Pole, Delta-Post

Figure G-19

Single Circuit 230 kV Single-Pole, DE-Vertical

Figure G-20



Single Circuit 230 kV Single-Pole, DE-Vertical-Davit

Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G

Figure G-21

Single Circuit 230 kV Single-Pole, Vertical-Braced-Post

Figure G-22

Single Circuit 230 kV Single-Pole, Vertical-Davit-Suspension

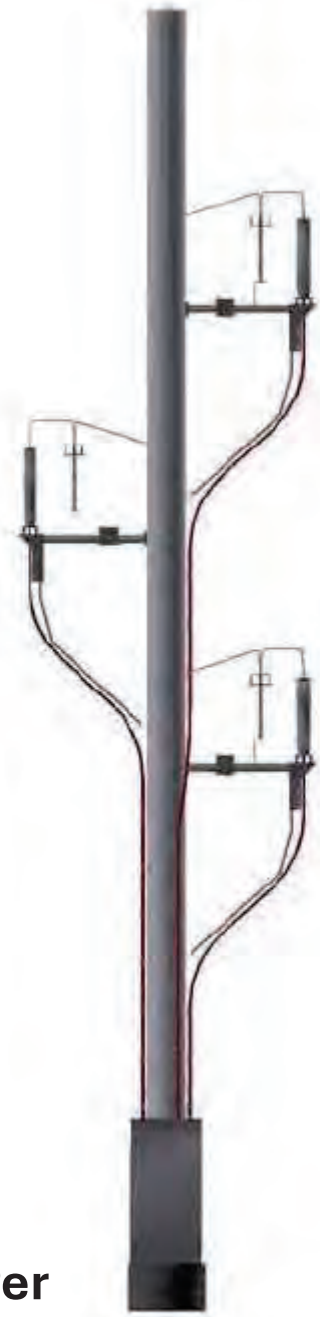
Figure G-23

Single Circuit 230 kV Single-Pole, Vertical-Post

Figure G-24

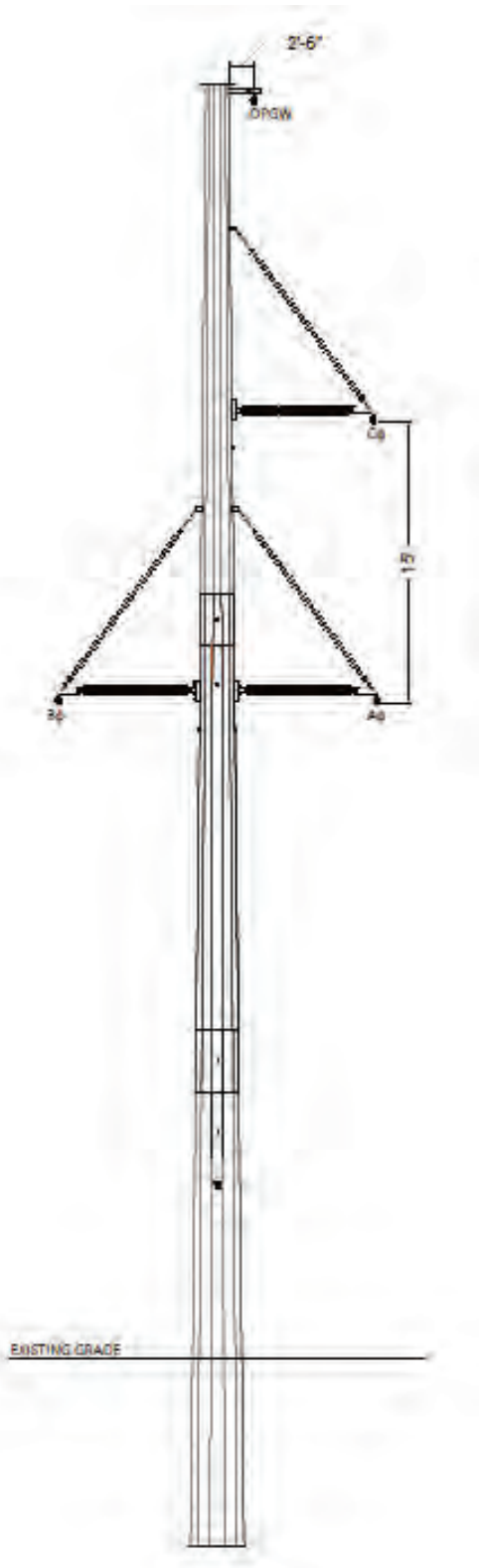
Single Circuit 230 kV
Riser Pole, Two Cables
Per Phase

Figure G-25



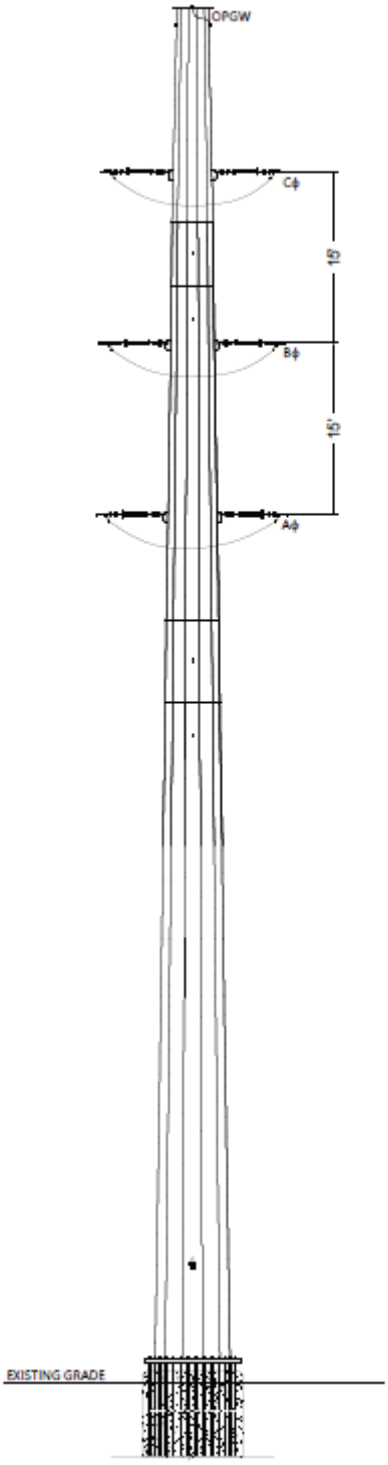
Single Circuit 230 kV Riser Pole, One Cable Per Phase

Figure G-26



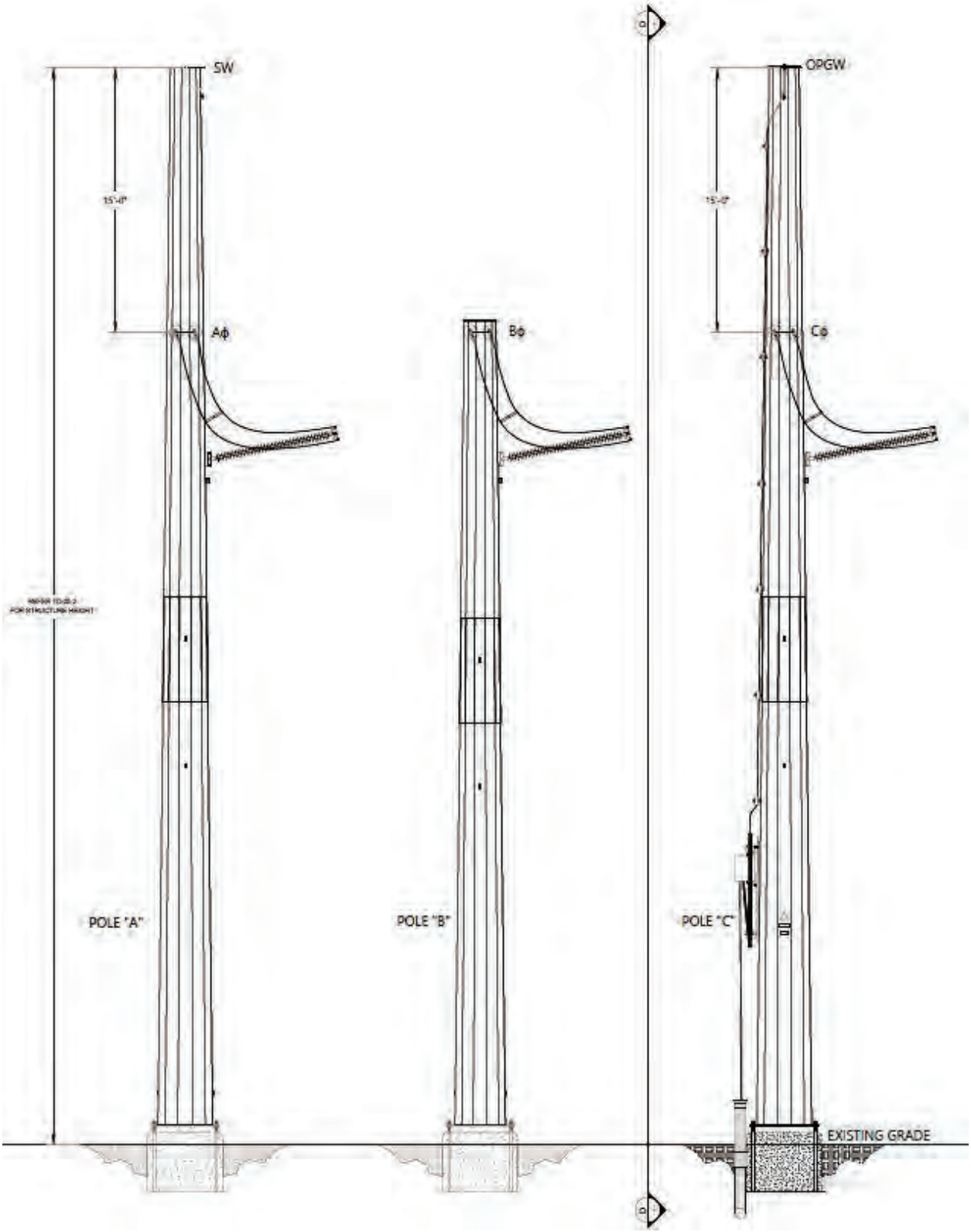
Typical Monopole Tangent Structure

Figure G-27



Typical Monopole Deadend Structure

Figure G-28



Typical Three Pole Deadend Structure

Eagle Eye Thermal Plant and Gen-Tie Project
Exhibit G