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August 27, 2001

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Arizona Corporation Commission
DOCKETED

L-00000AA-01-0116

AUG 27 2001

VIA HAND-DELIVERY

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

DOCKETED BY	<i>mc</i>
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Re: Supplemental Filing on Allegheny's Application for a Certificate of Environmental Compatibility; Siting Committee Case No. 116

Dear Sir/Madam:

Enclosed are twenty-six (26) copies of the Supplemental Filing of Allegheny in relation to its Application. It consists of:

1. A revised Exhibit A-4 map.
2. A revised Exhibit A.
3. A revised Exhibit E.

After filing the Application, La Paz County discovered two developments in the Project's vicinity which had been conceptually approved many years ago but were not reflected on the county zoning maps. The revised Exhibit A-4 reflects those two developments and the revised Exhibits A and E make textual changes in relation to them. Committee members or interested parties may simply substitute them for their counterparts in the Application.

Very truly yours,

GALLAGHER & KENNEDY, P.A.

By

Todd C. Wiley
Todd C. Wiley

26 copies filed this date
with Docket Control

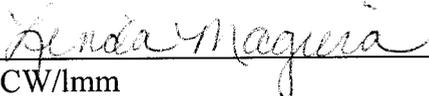
Docket Control
August 27, 2001
Page 2

COPY of the foregoing mailed
this 27th day of August, 2001 to:

Christopher Kempley, Esq.
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Laurie Woodall
Line Siting Committee Chair
Office of the Attorney General
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TCW/Imm
12921-0004/951107

EXHIBIT A-4

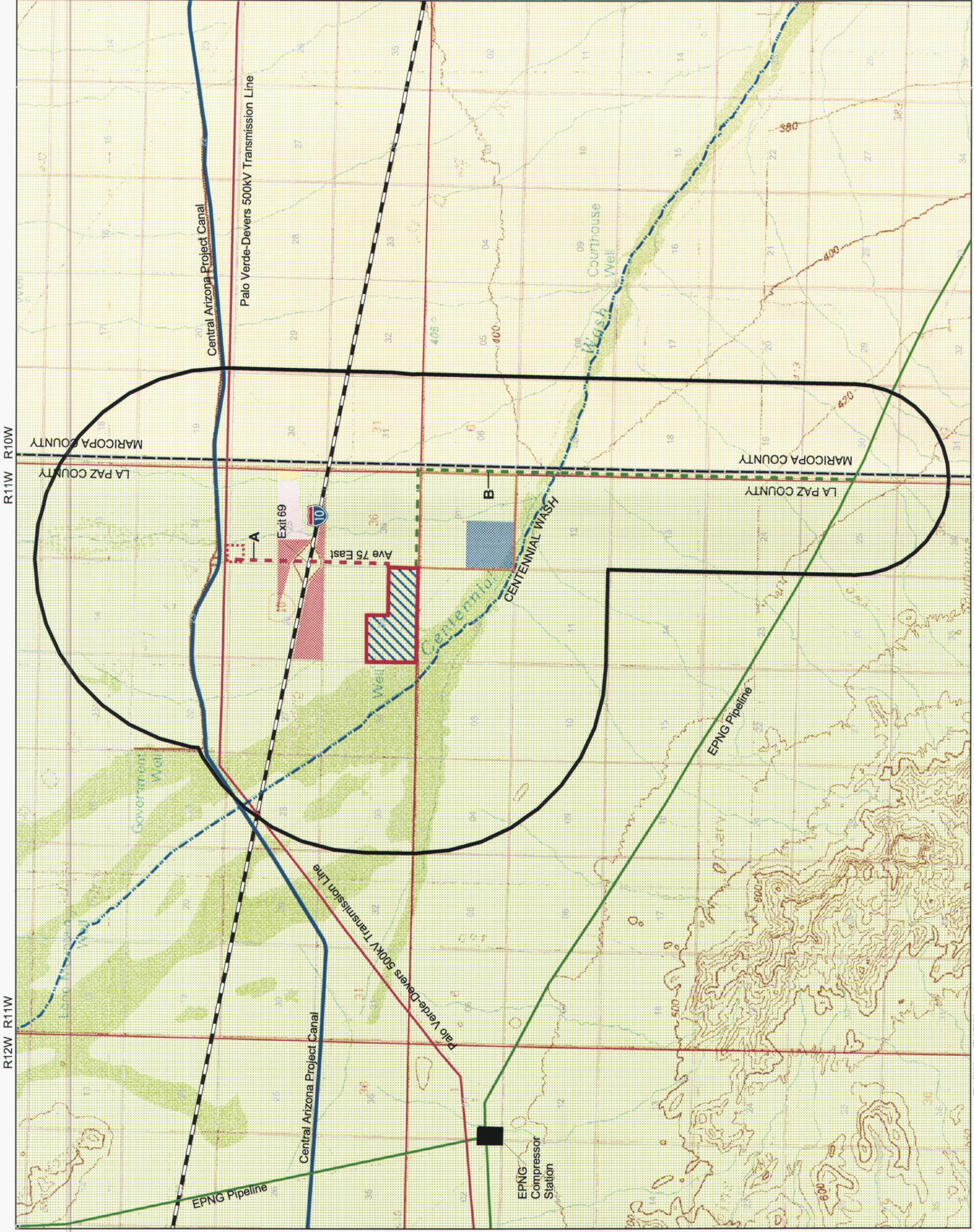
Exhibit A-4 La Paz/Maricopa County Zoning and Planned Land Use La Paz Generating Facility



Legend	
	R-190 (Rural Residential)
	Maricopa County
	RA-40 (Rural Residential)
	La Paz County
	HI (Heavy Industrial)
	La Paz County
	General Commercial
	La Paz County
	Recreation Vehicle Park
	La Paz County
	Mobile/Manufactured Home Park
	La Paz County
	Planned HI (Heavy Industrial)
	La Paz County
	Project Area Boundary
	Generating Facility Site
	Proposed Switchyard
	Well Field
	Township and Range Lines
	Section Lines and Numbers
	County Boundary
	Interstate Highway
	Central Arizona Project Canal
	Centennial Wash
	Proposed Gas Pipeline
	EPNG Pipeline
	Proposed 500kV Transmission Line
	Palo Verde-Devers 500kV Transmission Line

Source: USGS, Little Horn Mountains 30x60 Minute Quad, Revised 1988.
USGS, Salome 30x60 Minute Quad, Revised 1984.

Scale In Miles (1:62,500)



R12W R11W R11W R10W R12W R10W

T2N T3N T2N T3N

LA PAZ COUNTY MARICOPA COUNTY LA PAZ COUNTY MARICOPA COUNTY

Central Arizona Project Canal Palo Verde-Devers 500kV Transmission Line EPNG Pipeline Centennial Wash Government Well Courthouse Well Exit 69 Ave 75 East

EPNG Compressor Station

EXHIBIT A

EXHIBIT A—LOCATION MAP AND LAND USE INFORMATION

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In accordance with A.A.C. R14-3-219 Applicant provides the following location maps and land use information:

1. "Where commercially available, a topographic map, 1:250,000 scale, showing, the proposed plant site and the adjacent area within 20 miles thereof. If application is made for alternative plant sites, all sites may be shown on the same map, if practicable, designated by applicant's order of preference."
2. "Where commercially available, a topographic map, 1:62,500 scale, of each proposed plant site, showing the area within two miles thereof. The general land use plan within this area shall be shown on the map, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay."
3. "Where commercially available, a topographic map, 1:250,000 scale, showing any proposed transmission line route of more than 50 miles in length and the adjacent area. For routes of less than 50 miles in length, use a scale of 1:62,500. If application is made for alternative transmission line routes, all routes may be shown on the same map, if practicable, designated by applicant's order of preference."
4. "Where commercially available, a topographic map, 1:62,500 scale, of each proposed transmission line route of more than 50 miles in length showing that portion of the route within two miles of any subdivided area. The general land use plan within the area shall be shown on a 1:62,500 map required for Exhibit A-3, and for the map required by this Exhibit A-4, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay."

LAND USE OVERVIEW

The following exhibits are required by *Arizona Corporation Commission Rules of Practice and Procedure R14-3-219* to support the land use studies conducted for this application:

- Exhibit A-1 illustrates the project area on a 1:250,000 scale topographic map.
- Exhibit A-2 illustrates the proposed generating facility site, 500kV transmission line interconnection route, and natural gas pipeline lateral on a 1:62,500 scale topographic map. Additionally, Exhibit A-2 illustrates ownership and jurisdiction within the project area.
- Exhibit A-3 illustrates existing land uses surrounding the proposed generating facility site, 500kV transmission line interconnection route, and natural gas pipeline lateral on a 1:62,500 scale topographic map.
- Exhibit A-4 illustrates the La Paz and Maricopa County zoning classifications and planned land use near the proposed generating facility site, 500kV transmission line interconnection route, and natural gas pipeline lateral on a 1:62,500 scale topographic map.

The proposed generating facility site is located approximately 1 mile south of Interstate 10 at Exit 69 (Avenue 75E), approximately 21 miles southeast of the communities of Salome and Wenden, Arizona

(see Exhibit A-1). The proposed project falls entirely within unincorporated southeastern La Paz County (see Exhibit A-2). The project area consists of predominantly non-developed desert open space. Other land uses include agricultural land (production crops and livestock grazing), dispersed residences (40-acre lots), an RV park, and industrial uses. The industrial uses consist of the CAP canal, a water recharge facility, natural gas pipeline corridor and compressor station, 500kV transmission line, several aboveground well pumps, and several 12kV distribution lines. Interstate 10 bisects the project area, with local access served by the Exit 69 interchange at Avenue 75E.

Two areas were identified for potential future development consisting of a mixed use commercial, industrial, and residential (RV/mobile home park) hub near the Exit 69 interchange.

Potential impacts on existing and future land use resulting from the proposed project are predicted to be moderate to low. Strategic siting of the facility in areas designated or planned for industrial development has resulted in overall land use impacts which would be lower than those typically expected for a generating facility and 500kV transmission line interconnection.

INVENTORY METHODS

The inventory of existing and future land uses within the project area consisted of reviewing planning documents, maps, and aerial photography and conducting field visits. Additionally, data were supplemented and verified by personal communication with agency planning personnel. Data were collected for a 2-mile area surrounding the proposed generating facility site and 500kV transmission line interconnect; and for 1 mile surrounding the proposed pipeline lateral. Data were collected outside of these boundaries when needed to support the visual resource studies. Planning documents included La Paz and Maricopa County general land use plans and zoning ordinances, as well as Bureau of Land Management (BLM) Lower Gila South Resource Management Plan. Maps included USGS Topographic Quadrangle, La Paz County Assessor, and Ownership and Jurisdiction from the Arizona State Land Department. Digital aerial photography was obtained from Kenney Aerial Mapping for the years 1999 and 2001. Field visits were conducted during April and May of 2001 to confirm the inventory data captured from these sources. Relevant data were recorded on maps, photos, and tables for tracking and documentation purposes. A complete set of references is included at the end of this exhibit.

INVENTORY RESULTS

Proposed Generating Facility Site

The proposed generating facility site is located within the SW $\frac{1}{4}$ of (160 acres) and S $\frac{1}{2}$, SE $\frac{1}{4}$ (80 acres) of Section 35, T3N, R11W (see Exhibit A-3 and Figure 1). The proposed generating facility would occupy approximately 40 acres, with an additional 40 to 60 acres for an evaporation pond and/or auxiliary facilities. (Allegheny would develop a well field in Section 1, T2N, R11W [640 acres]). Allegheny currently owns the SW $\frac{1}{4}$ of Section 1, T2N, R11W (160 acres) and has initiated a land exchange with the BLM to acquire the remaining 480 acres of land in Section 1, T2N, R11W. Land in each of these sections is a typical Sonoran desert scrub landscape, with Centennial Wash covering a small portion of the southwest corner of each section.

The SW $\frac{1}{4}$ of Section 1, T2N, R11W (160 acres) is currently zoned for heavy industrial use by La Paz County and has a special use permit to site a power plant. The SW $\frac{1}{4}$ of (160 acres) and S $\frac{1}{2}$, SE $\frac{1}{4}$ (80 acres) of Section 35, T3N, R11W is currently in the process of being rezoned for heavy industrial use by La Paz County (see Exhibit A-4).

Property surrounding the proposed generating facility site consists of a combination of private, State, and BLM lands (see Exhibit A-2). Dominating land uses surrounding the proposed generating facility site include agricultural land currently used for crop production, livestock grazing, irrigation ditches, and water wells/pumps, as well as non-developed desert open space including Centennial Wash. The closest residence is approximately 1.75 miles north of the proposed generating facility site on the opposite side of Interstate 10. Snowbird West RV Park and six residences are located north of the CAP canal approximately 2.75 to 3 miles from the proposed generating facility site. Six additional residences are located near Centennial Wash, approximately 4.5 miles southeast of the proposed generating facility site. All residences appear to be permanent or year-round with the exception of Snowbird West RV Park. A grazing permit exists for the BLM land (480 acres) in Section 1, T2N, R11W.

Major transportation corridors near the generating facility include Interstate 10 with a seasonal daily traffic volume of approximately 10,000 to 20,000 (ADOT 1996) and Salome Road with a seasonal daily traffic volume of 1,200 (La Paz County 2001) Avenue 75E provides access to the generating facility and to the Snowbird West RV Park from the Exit 69 interchanges along Interstate 10.

There are several industrial features located adjacent to the generating facility including the following:

- water recharge facility (approximately 1 mile west of the proposed generating facility site in Section 33, T3N, R11W)
- CAP canal (approximately 1.75 miles north of the proposed generating facility site)
- Palo Verde-Devers 500kV transmission line (approximately 1.75 miles north of the proposed generating facility site)
- multiple 12kV transmission lines
- several borrow pits/extraction areas

There are no developed recreation areas near the generating facility. Dispersed recreation uses include off-highway vehicle use, hunting, hiking, walking, and wildlife viewing along Centennial Wash and Avenue 75E.

Future land use designations near the generating facility consist primarily of rural low-density residential development (40-acre lots) with some areas designated for industrial and commercial use south of Interstate 10 (see Exhibit A-4). Although there are no formal future land use plans by La Paz County, they have expressed interest in expanding commercial and industrial development south of Interstate 10 along Avenue 75E.

Allegheny has obtained the necessary ROW across State and private land for upgrading (i.e., paving and widening) Avenue 75E from Exit 69 along Interstate 10 to the proposed generating facility site.

Proposed 500kV Transmission Line Interconnect (Route A)

The proposed 500kV transmission line interconnect would require a ROW 1.75 miles long by 200 feet wide, or approximately 42 acres, across State (ASLD and ADOT) and private lands paralleling the east side of Avenue 75E. There would be approximately 10 self-supporting steel-lattice structures located within the ROW. Currently the State land is used for agricultural crops and the private land is undeveloped desert open space (see Exhibit A-3 and Figure 1). The proposed transmission line interconnect would require an aerial easement where it crosses Interstate 10 adjacent to the Exit 69

interchange. The closest resident is approximately 0.25 mile northwest of the proposed transmission line interconnect on the north side of the Palo Verde-Devers 500kV transmission line. There are no developed recreation areas along the proposed transmission line interconnect route.

Two specific rezoning cases were identified by La Paz County adjacent to the transmission line interconnect. Three different zoning districts (General Commercial, R/V Park, and Mobile/Manufactured Home Park) are depicted within Section 25 and Section 26, Township 3 North, Range 11 West for a total of 339.67 acres (see Exhibit A-4). The three different commercial land uses along the east side of Avenue 75E within Section 25 (172 acres) were rezoned in 1986 for a conceptual master plan called Centennial Arizona. This plan consists of two truck stops, one RV park, one wastewater treatment plant, two restaurants, two motels, and a mobile home park. Plans for Centennial Arizona have not been finalized and development/construction has not been initiated in the 15 years since the rezoning application was completed. Rezoned commercial property along the west side of Avenue 75E in Section 26 (167 acres) was rezoned in 1986 and has not yet been planned for development.

Proposed 500kV Switchyard Site

The proposed 500kV switchyard site would be located at the southeast corner of the intersection of the proposed 500kV transmission line interconnect and the Palo Verde-Devers 500kV transmission line. The proposed switchyard would require purchasing 20 acres of private land which is currently undeveloped desert open space (see Exhibit A-3 and Figure 1). The closest resident is approximately 0.25 mile northwest of the proposed switchyard site on the north side of the Palo Verde-Devers 500kV transmission line. There is a small livestock corral located north of the Palo Verde-Devers 500kV transmission line and adjacent to the CAP canal. There are no developed recreation areas within the proposed switchyard site.

The proposed switchyard site is designated by La Paz County for rural low density (40-acre lots) residential development (see Exhibit A-4).

Proposed Natural Gas Pipeline Lateral (Route B)

The generating facility would require construction of a 5.5-mile underground natural gas pipeline lateral connecting with the existing EPNG pipeline. The gas pipeline lateral would require 3.5 miles of ROW across State land and 2 miles across private land. The ROW would be approximately 100 feet wide and would amount to approximately 65 acres. The proposed pipeline lateral would not cross BLM lands.

Land along the proposed pipeline lateral corridor is primarily undeveloped desert open space supporting some livestock grazing. The proposed pipeline lateral would be directionally bored under 0.25 mile of Centennial Wash.

There are dispersed recreational uses along the proposed pipeline lateral consisting mainly of off-highway vehicle use and hunting primarily along Centennial Wash. The Eagletail Mountains Wilderness (managed by BLM) is located approximately 2 to 3 miles south/southwest of the proposed pipeline lateral. Recreational uses found within the wilderness area include hiking, biking, wildlife viewing, viewing of petroglyphs, and camping.

La Paz County designates the proposed pipeline lateral corridor for rural low density (40-acre lots) residential development (see Exhibit A-4).

ASSESSMENT METHODOLOGY

Methods

The assessment of impacts required a comprehensive inventory of existing and future land uses in areas where the proposed generating facility, 500kV transmission line interconnect and switchyard, and pipeline lateral would be located. Information gathered during the inventory was reviewed for potential impacts on existing land use resulting from the construction, operation, and maintenance of the project. The project was also compared with future land use plans to determine the compatibility or potential conflicts with plans for the project area.

The anticipated physical impacts on land uses are based on the locations where the proposed project would occur. The sensitivity of nearby land uses within the region of influence also was considered if the proposed project would be anticipated to interfere with the function of that land use. Duration of impact also was considered. Long-term impacts are those that would be permanent or those that would last for the life of the proposed project and short-term impacts are those associated with construction.

Impacts are described in terms of high, moderate, and low for each aspect of the proposed project. High impacts would be the most severe and low would be the ornate. High impacts would typically occur if there was a removal or displacement of sensitive land uses, such as existing or future (approved) residences or designated recreation areas. Moderate impacts would occur if there were a removal of moderately sensitive land, such as commercial development and future (conceptually designated) residential areas. Low impacts typically occur if there is minimal to no disturbance of a moderately sensitive resource or displacement of another low sensitivity use (e.g., mining/extraction areas, grazing areas, agricultural uses, utility corridors).

MITIGATION MEASURES

The following mitigation measures will be implemented to reduce impacts to existing and future land uses that may result due to the construction, operation, and maintenance of proposed project.

1. The plant will comply with all applicable La Paz County zoning regulations for heavy industrial use (La Paz County Planning Division, 1996) including:
 - Front Setback—20 feet
 - Side Setback—5 feet abutting residential zones, otherwise zero
 - Rear Setback—20 feet abutting residential zones, otherwise zero except that dwelling in HI require 5 feet
 - Height limits—45 feet

Buildings may exceed the stated height limit if:

The total floor area of all levels of the building is less than or equal to 20 percent of the total lot area on which the building is located

or

The building is set back from all property lines a distance of 25 feet plus 1 additional foot for each foot of building height exceeding 45 feet

- Where there is an industrial zone bounded by any residential zone, a 6-foot-high sight-obscuring wall or fence is required.
2. A landscaping plan will be generated for the generation facility site.
 3. Neutral color schemes will be used for generation facility equipment.
 4. Areas disturbed during construction and not required for operation and maintenance will be revegetated.
 5. Sensitive features (e.g., Interstate 10) will be spanned by the proposed 500kV transmission line interconnect to avoid disturbance or displacement.
 6. Centennial Wash will be directionally bored to minimize disturbance.

ASSESSMENT RESULTS

Proposed Generating Facility Site

Short-term and long-term impacts resulting from the proposed generating facility would be low. The generating facility is located on land designated [SW ¼ of Section 1, T2N, R11W (160 acres)] or planned [SW1/4 of (160 acres) and S1/2, SE1/4 (80 acres) of Section 35, T3N, R11W] for heavy industrial use. Currently these lands consist of undeveloped desert open space (primarily desert scrub). Additionally, the generating facility would avoid Centennial Wash and the associated 100-year floodplain.

There would not be displacement of residences or other private land as a result of the proposed generating facility. Nearby BLM-managed lands are utilized for livestock grazing, provide dispersed recreation uses, and allow for access to public and private lands. With one exception, existing uses (e.g., residences, recreation, agriculture) on private and public land would not change or be impacted as a result of the proposed generating facility. The exception would result if the BLM land exchange within Section 1, T2N, R11W (480 acres) takes place. The grazing permit would be terminated so that a well field could be established resulting in low to moderate impacts on ranching activities, since it represents a relatively small percentage of land with minimal grazing value.

Improved access along Avenue 75E would increase access south of Interstate 10. This would result in low impacts on existing land uses and may benefit the area if there are future commercial and industrial developments in this area.

Proposed 500kV Transmission Line Interconnect (Route A)

Short-term and long-term impacts associated with the proposed 500kV transmission line interconnect would be moderate to low. Moderate impacts would occur for agricultural land east of Avenue 75E, primarily due to restrictions placed on aerial application (crop dusting) of pesticides during periods of crop production. The proposed transmission line interconnect would prevent east/west flight paths, but north/south flight paths would still be available. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Impacts crossing Interstate 10 would be low, since the crossing would not impact the flow of traffic or safety of travelers using the roadway. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed transmission line interconnect would restrict residential development within the ROW. This includes the mixed use commercial development property on the west side of Avenue 75E, where the proposed transmission line interconnection would cross a section of the property planned for restaurants and a truck stop.

Proposed 500kV Switchyard

Short-term and long-term impacts associated with proposed 500kV switchyard would be moderate to low. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed switchyard would restrict residential development within the ROW.

Proposed Natural Gas Pipeline Lateral (Route B)

Short-term and long-term impacts associated with proposed pipeline lateral would be moderate to low. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Impacts on Centennial Wash would be low if directionally bored actions took place allowing for no ground disturbance within the wash. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed pipeline lateral would restrict residential development within the ROW.

CONCLUSIONS

The proposed project would not result in adverse impacts to existing and future land use. The proposed generating facility would result in low impacts to land use since it is located on vacant undeveloped desert scrub land, planned for industrial development by La Paz County. Moderate impacts would occur where the proposed 500kV transmission line interconnection displaces agricultural land and areas conceptually designated for future low-density residential and commercial development. Moderate impacts would occur to areas conceptually designated for future low-density residential development due to the proposed 500kV switchyard. The remaining impacts to land use resulting from the proposed project would be low. Overall land use impacts would be lower than those typically expected for a generating facility and 500kV transmission line interconnection.

REFERENCES

Arizona Department of Transportation, 1996. Traffic Count Study.

Arizona State Land Department, Ownership 1996.

Bureau of Land Management, February 2000.

Kenney Aerial Photography, 2001.

Kenney Aerial Photography, 1999.

La Paz County Zoning Regulations. La Paz County. July 31, 1996.

Lower Gila South. Resource Management Plan Environmental Impact Statement Phoenix District, Arizona. February 1, 1985.

Final Amendment and Environmental Assessment to the Lower Gila North Management.

Framework Plan and the Lower Gila South Resource Management Plan.

Personal communication with Kyle Mahan, Bureau of Land Management, May 30, 2001.

Personal communication with Tom Simmons, La Paz county, June 12, 2001.

EXHIBIT E

EXHIBIT A

EXHIBIT A—LOCATION MAP AND LAND USE INFORMATION

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(see Exhibit A-1). The proposed project falls entirely within unincorporated southeastern La Paz County (see Exhibit A-2). The project area consists of predominantly non-developed desert open space. Other land uses include agricultural land (production crops and livestock grazing), dispersed residences (40-acre lots), an RV park, and industrial uses. The industrial uses consist of the CAP canal, a water recharge facility, natural gas pipeline corridor and compressor station, 500kV transmission line, several aboveground well pumps, and several 12kV distribution lines. Interstate 10 bisects the project area, with local access served by the Exit 69 interchange at Avenue 75E.

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The SW $\frac{1}{4}$ of Section 1, T2N, R11W (160 acres) is currently zoned for heavy industrial use by La Paz County and has a special use permit to site a power plant. The SW $\frac{1}{4}$ of (160 acres) and S $\frac{1}{2}$, SE $\frac{1}{4}$ (80 acres) of Section 35, T3N, R11W is currently in the process of being rezoned for heavy industrial use by La Paz County (see Exhibit A-4).

Property surrounding the proposed generating facility site consists of a combination of private, State, and BLM lands (see Exhibit A-2). Dominating land uses surrounding the proposed generating facility site include agricultural land currently used for crop production, livestock grazing, irrigation ditches, and water wells/pumps, as well as non-developed desert open space including Centennial Wash. The closest residence is approximately 1.75 miles north of the proposed generating facility site on the opposite side of Interstate 10. Snowbird West RV Park and six residences are located north of the CAP canal approximately 2.75 to 3 miles from the proposed generating facility site. Six additional residences are located near Centennial Wash, approximately 4.5 miles southeast of the proposed generating facility site. All residences appear to be permanent or year-round with the exception of Snowbird West RV Park. A grazing permit exists for the BLM land (480 acres) in Section 1, T2N, R11W.

Major transportation corridors near the generating facility include Interstate 10 with a seasonal daily traffic volume of approximately 10,000 to 20,000 (ADOT 1996) and Salome Road with a seasonal daily traffic volume of 1,200 (La Paz County 2001) Avenue 75E provides access to the generating facility and to the Snowbird West RV Park from the Exit 69 interchanges along Interstate 10.

There are several industrial features located adjacent to the generating facility including the following:

- water recharge facility (approximately 1 mile west of the proposed generating facility site in Section 33, T3N, R11W)
- CAP canal (approximately 1.75 miles north of the proposed generating facility site)
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There are no developed recreation areas near the generating facility. Dispersed recreation uses include off-highway vehicle use, hunting, hiking, walking, and wildlife viewing along Centennial Wash and Avenue 75E.

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Allegheny has obtained the necessary ROW across State and private land for upgrading (i.e., paving and widening) Avenue 75E from Exit 69 along Interstate 10 to the proposed generating facility site.

Proposed 500kV Transmission Line Interconnect (Route A)

The proposed 500kV transmission line interconnect would require a ROW 1.75 miles long by 200 feet wide, or approximately 42 acres, across State (ASLD and ADOT) and private lands paralleling the east side of Avenue 75E. There would be approximately 10 self-supporting steel-lattice structures located within the ROW. Currently the State land is used for agricultural crops and the private land is undeveloped desert open space (see Exhibit A-3 and Figure 1). The proposed transmission line interconnect would require an aerial easement where it crosses Interstate 10 adjacent to the Exit 69

interchange. The closest resident is approximately 0.25 mile northwest of the proposed transmission line interconnect on the north side of the Palo Verde-Devers 500kV transmission line. There are no developed recreation areas along the proposed transmission line interconnect route.

Two specific rezoning cases were identified by La Paz County adjacent to the transmission line interconnect. Three different zoning districts (General Commercial, R/V Park, and Mobile/Manufactured Home Park) are depicted within Section 25 and Section 26, Township 3 North, Range 11 West for a total of 339.67 acres (see Exhibit A-4). The three different commercial land uses along the east side of Avenue 75E within Section 25 (172 acres) were rezoned in 1986 for a conceptual master plan called Centennial Arizona. This plan consists of two truck stops, one RV park, one wastewater treatment plant, two restaurants, two motels, and a mobile home park. Plans for Centennial Arizona have not been finalized and development/construction has not been initiated in the 15 years since the rezoning application was completed. Rezoned commercial property along the west side of Avenue 75E in Section 26 (167 acres) was rezoned in 1986 and has not yet been planned for development.

Proposed 500kV Switchyard Site

The proposed 500kV switchyard site would be located at the southeast corner of the intersection of the proposed 500kV transmission line interconnect and the Palo Verde-Devers 500kV transmission line. The proposed switchyard would require purchasing 20 acres of private land which is currently undeveloped desert open space (see Exhibit A-3 and Figure 1). The closest resident is approximately 0.25 mile northwest of the proposed switchyard site on the north side of the Palo Verde-Devers 500kV transmission line. There is a small livestock corral located north of the Palo Verde-Devers 500kV transmission line and adjacent to the CAP canal. There are no developed recreation areas within the proposed switchyard site.

The proposed switchyard site is designated by La Paz County for rural low density (40-acre lots) residential development (see Exhibit A-4).

Proposed Natural Gas Pipeline Lateral (Route B)

The generating facility would require construction of a 5.5-mile underground natural gas pipeline lateral connecting with the existing EPNG pipeline. The gas pipeline lateral would require 3.5 miles of ROW across State land and 2 miles across private land. The ROW would be approximately 100 feet wide and would amount to approximately 65 acres. The proposed pipeline lateral would not cross BLM lands.

Land along the proposed pipeline lateral corridor is primarily undeveloped desert open space supporting some livestock grazing. The proposed pipeline lateral would be directionally bored under 0.25 mile of Centennial Wash.

There are dispersed recreational uses along the proposed pipeline lateral consisting mainly of off-highway vehicle use and hunting primarily along Centennial Wash. The Eagletail Mountains Wilderness (managed by BLM) is located approximately 2 to 3 miles south/southwest of the proposed pipeline lateral. Recreational uses found within the wilderness area include hiking, biking, wildlife viewing, viewing of petroglyphs, and camping.

La Paz County designates the proposed pipeline lateral corridor for rural low density (40-acre lots) residential development (see Exhibit A-4).

ASSESSMENT METHODOLOGY

Methods

The assessment of impacts required a comprehensive inventory of existing and future land uses in areas where the proposed generating facility, 500kV transmission line interconnect and switchyard, and pipeline lateral would be located. Information gathered during the inventory was reviewed for potential impacts on existing land use resulting from the construction, operation, and maintenance of the project. The project was also compared with future land use plans to determine the compatibility or potential conflicts with plans for the project area.

The anticipated physical impacts on land uses are based on the locations where the proposed project would occur. The sensitivity of nearby land uses within the region of influence also was considered if the proposed project would be anticipated to interfere with the function of that land use. Duration of impact also was considered. Long-term impacts are those that would be permanent or those that would last for the life of the proposed project and short-term impacts are those associated with construction.

Impacts are described in terms of high, moderate, and low for each aspect of the proposed project. High impacts would be the most severe and low would be the ornate. High impacts would typically occur if there was a removal or displacement of sensitive land uses, such as existing or future (approved) residences or designated recreation areas. Moderate impacts would occur if there were a removal of moderately sensitive land, such as commercial development and future (conceptually designated) residential areas. Low impacts typically occur if there is minimal to no disturbance of a moderately sensitive resource or displacement of another low sensitivity use (e.g., mining/extraction areas, grazing areas, agricultural uses, utility corridors).

MITIGATION MEASURES

The following mitigation measures will be implemented to reduce impacts to existing and future land uses that may result due to the construction, operation, and maintenance of proposed project.

1. The plant will comply with all applicable La Paz County zoning regulations for heavy industrial use (La Paz County Planning Division, 1996) including:
 - Front Setback—20 feet
 - Side Setback—5 feet abutting residential zones, otherwise zero
 - Rear Setback—20 feet abutting residential zones, otherwise zero except that dwelling in HI require 5 feet
 - Height limits—45 feet

Buildings may exceed the stated height limit if:

The total floor area of all levels of the building is less than or equal to 20 percent of the total lot area on which the building is located

or

The building is set back from all property lines a distance of 25 feet plus 1 additional foot for each foot of building height exceeding 45 feet

- Where there is an industrial zone bounded by any residential zone, a 6-foot-high sight-obscuring wall or fence is required.
2. A landscaping plan will be generated for the generation facility site.
 3. Neutral color schemes will be used for generation facility equipment.
 4. Areas disturbed during construction and not required for operation and maintenance will be revegetated.
 5. Sensitive features (e.g., Interstate 10) will be spanned by the proposed 500kV transmission line interconnect to avoid disturbance or displacement.
 6. Centennial Wash will be directionally bored to minimize disturbance.

ASSESSMENT RESULTS

Proposed Generating Facility Site

Short-term and long-term impacts resulting from the proposed generating facility would be low. The generating facility is located on land designated [SW ¼ of Section 1, T2N, R11W (160 acres)] or planned [SW1/4 of (160 acres) and S1/2, SE1/4 (80 acres) of Section 35, T3N, R11W] for heavy industrial use. Currently these lands consist of undeveloped desert open space (primarily desert scrub). Additionally, the generating facility would avoid Centennial Wash and the associated 100-year floodplain.

There would not be displacement of residences or other private land as a result of the proposed generating facility. Nearby BLM-managed lands are utilized for livestock grazing, provide dispersed recreation uses, and allow for access to public and private lands. With one exception, existing uses (e.g., residences, recreation, agriculture) on private and public land would not change or be impacted as a result of the proposed generating facility. The exception would result if the BLM land exchange within Section 1, T2N, R11W (480 acres) takes place. The grazing permit would be terminated so that a well field could be established resulting in low to moderate impacts on ranching activities, since it represents a relatively small percentage of land with minimal grazing value.

Improved access along Avenue 75E would increase access south of Interstate 10. This would result in low impacts on existing land uses and may benefit the area if there are future commercial and industrial developments in this area.

Proposed 500kV Transmission Line Interconnect (Route A)

Short-term and long-term impacts associated with the proposed 500kV transmission line interconnect would be moderate to low. Moderate impacts would occur for agricultural land east of Avenue 75E, primarily due to restrictions placed on aerial application (crop dusting) of pesticides during periods of crop production. The proposed transmission line interconnect would prevent east/west flight paths, but north/south flight paths would still be available. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Impacts crossing Interstate 10 would be low, since the crossing would not impact the flow of traffic or safety of travelers using the roadway. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed transmission line interconnect would restrict residential development within the ROW. This includes the mixed use commercial development property on the west side of Avenue 75E, where the proposed transmission line interconnection would cross a section of the property planned for restaurants and a truck stop.

Proposed 500kV Switchyard

Short-term and long-term impacts associated with proposed 500kV switchyard would be moderate to low. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed switchyard would restrict residential development within the ROW.

Proposed Natural Gas Pipeline Lateral (Route B)

Short-term and long-term impacts associated with proposed pipeline lateral would be moderate to low. Impacts resulting from displacement of undeveloped desert open space (primarily desert scrub) would be low. Impacts on Centennial Wash would be low if directionally bored actions took place allowing for no ground disturbance within the wash. Existing residences and designated recreation areas would not be impacted.

Moderate impacts would result for lands conceptually designated by La Paz County for rural residential development, since the proposed pipeline lateral would restrict residential development within the ROW.

CONCLUSIONS

The proposed project would not result in adverse impacts to existing and future land use. The proposed generating facility would result in low impacts to land use since it is located on vacant undeveloped desert scrub land, planned for industrial development by La Paz County. Moderate impacts would occur where the proposed 500kV transmission line interconnection displaces agricultural land and areas conceptually designated for future low-density residential and commercial development. Moderate impacts would occur to areas conceptually designated for future low-density residential development due to the proposed 500kV switchyard. The remaining impacts to land use resulting from the proposed project would be low. Overall land use impacts would be lower than those typically expected for a generating facility and 500kV transmission line interconnection.

REFERENCES

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EXHIBIT E

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

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

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

"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."

SCENIC AREAS/VISUAL RESOURCES

The proposed project is located within the Basin and Range physiographic province (Fennemen, 1931), which is distinguished by isolated, roughly parallel, east-west trending mountain ranges separated by vast desert basins. The surrounding mountain ranges provide greater visual interest and diversity in terms of landform, texture, and color, while the basin areas are relatively flat with scenic areas limited to dissecting washes where a higher density and diversity of vegetation occurs. The basin area landscapes are generally vast and open, permitting expansive views and vistas of adjacent mountains.

The proposed project is located at the northwestern end of the Harquahala Plains (Valley). Much of this area contains typical Sonoran desert landscape consisting of relatively flat terrain, sparse vegetation, and numerous small drainages. There is some dispersed residential development, agricultural land, Interstate 10, and industrial facilities (e.g., CAP canal, Palo Verde-Devers 500kV transmission line, EPNG pipelines, water recharge facility). Distant mountain ranges surrounding the project area include the Big Horn Mountains to the northeast, Eagletail Mountains to the south, and Little Harquahala Mountains to the northwest.

The proposed project would be located on land owned by Allegheny. Adjacent land north and west of the proposed site is privately owned. ASLD owns the land to the east and south of the generating facility site, while BLM owns the land to the southeast and southwest of the site. The proposed project is entirely within La Paz County. While there are no formal guidelines for managing visual resources on ASLD, private, or La Paz County land, BLM has established comprehensive guidelines to manage visual resources for land under their jurisdiction. The appropriate BLM guidelines are discussed in detail in the following sections.

Potential impacts on visual resources resulting from the proposed project are predicted to range from moderate to low. Strategic siting of the facility in landscapes with minimal scenic quality, existing industrial development, and few high sensitivity viewers (e.g., residences and recreation areas) has resulted in overall visual impacts which would be lower than those typically expected for a generating facility and 500kV transmission line interconnection. Additionally, the application of mitigation measures including surface treatment (i.e., dulled or painted finish) for the facilities, revegetation/landscaping, and shielding and directive devices for plant lighting would effectively reduce potential impacts on visual resources.

INVENTORY METHODS

The sphere of influence for visual resources included areas within 2 miles of the proposed generating facility site, 500kV transmission line interconnect, and switchyard. There were specific cases where viewing conditions were evaluated up to 5 miles from the generating facility site due to the sensitivity of the use (e.g., the Eagletail Wilderness).

Inventory methods for this analysis were based on the BLM Visual Resource Inventory and Contrast Rating System (BLM 8400 Series Manual, 1986) and adapted to the specific issues related to construction

and operation of the proposed project. The visual resources inventory included assessing scenic quality (including existing visual conditions), selecting sensitive viewpoints or key observation points (KOPs), and reviewing BLM Visual Resource Management (VRM) Classes.

Scenic Quality

Determining the scenic quality of a given landscape includes evaluating the character and diversity of landform, vegetation, water, color, adjacent scenery, and cultural or manmade features. Based on these elements, the project area was divided into the following units to identify the relative scenic value of a landscape:

- Class A (lands of outstanding or distinctive diversity or interest)
- Class B (lands of common or average diversity or interest)
- Class C (lands of minimal diversity or interest)

Class A represents the highest scenic value and C the lowest. An important aspect of evaluating scenic quality is documenting existing visual conditions and modifications present in the landscape like existing transmission lines, pipelines, roadways, and other industrial features that may influence the scenic quality in a given landscape.

Key Observation Points (KOPs)

KOPs are viewing locations that are representative of the most sensitive viewers that would view the proposed project. The inventory of KOPs included the following three components:

- identification of KOPs
- viewer sensitivity
- project visibility (seen areas and distance zones).

KOPs were identified based on review of available land use data, field review, public and agency review, and previous environmental studies in the region of influence. Additionally, a general inventory of other sensitive viewing areas was documented to account for distant viewers who would see the project facilities but not be significantly impacted.

Viewer sensitivity is a measure of the degree of concern for change in the visual character of a landscape. Viewer sensitivity is determined by evaluating type of use, user attitude, volume of use, influence of adjacent land use, and viewing duration. Two levels of sensitive views were evaluated for this project—high and moderate. Low sensitivity views were not evaluated since they would not result in significant visual impacts.

Visibility reflects how the proposed project would be seen and what distance it is from a particular KOP or viewing area. There were three distance zones defined within the region of influence, as follows:

- Foreground views: 0 to 1 mile
- Middleground views: 1 to 3 miles

- Background views: 3 to 5 miles (views beyond 5 miles are considered outside the visual sphere of influence)

BLM VRM Classes

Visual resources are land, water, vegetation, animals, and other visible features of an area. A VRM class contains specific objectives for maintaining or enhancing visual resource values (Palo Verde-Devers EIS, 1979). Visual sensitivity levels define the importance and guidance of management to the land. The following is a summary of the VRM Classes.

Class I—The objective of this class is to preserve the existing character of the landscape. Changes to the landscape character must be low and should not be evident.

Class II—The objective of this class is to retain the existing character of the landscape. Changes to the landscape character may attract slight attention, but should be subordinate to the visual setting.

Class III—The objective of this class is to partially retain the existing character of the landscape. Changes to the landscape character may begin to attract attention, but should not dominate the visual setting.

Class IV—The objective of this class is to allow for activities that modify the existing character of the landscape. Changes to the landscape character may attract attention and dominate the visual setting. However, these activities should minimize changes to the landscape where possible.

According to the BLM Palo Verde-Devers 500kV Transmission Line EIS, the VRM classification for project area is Class III. The Eagletail Mountains are located outside of the project area and are considered VRM Class II.

INVENTORY RESULTS

The inventory of visual resources identified several scenic quality units and KOPs (Figure E-1). Scenic quality in the area was predominantly Class C desert scrub landscapes. Class B landscapes included Centennial Wash and agricultural land. The Eagletail Mountains are a Class A landscape, however, they are located outside the visual sphere of influence. There were five KOPs identified including residences, Interstate 10, and an access point into the Eagletail Mountains Wilderness. The following sections describe the scenic quality and KOPs located within the visual sphere of influence for the proposed generating facility site, transmission line interconnect, and pipeline lateral.

Proposed Generating Facility Site

Scenic Quality

The generating facility site is located on a Class C scenic quality landscape characterized by flat terrain with typical desert scrub vegetation primarily consisting of creosote and grasses. The darker green vegetation contrasts with the tan soils adding minimal diversity to the landscape. The desert scrub landscape is relatively indistinctive in terms of scenic quality within the northern Harquahala Valley. Much of area surrounding the proposed generating facility site consists of Class C desert scrub landscapes as well.

Figure E-1

Agricultural land located to the east, south, and west of the generating facility site is considered Class B scenic quality. When in production the dark green vegetation contrasts with the surrounding desert scrub landscapes adding to the visual interest within the landscape. Currently, the agricultural land is fallow and offers minimal diversity and scenic value and could be considered Class C scenic quality.

Centennial Wash crosses the southwestern corner of the generating facility site. This ephemeral wash is a distinctive landscape in the project area and is considered to be Class B scenic quality. The wash is characterized by a dense cover of vegetation including creosote, mesquite trees, tamarisk, and crucifixion thorn. Water is present in the wash during and after periods of intense rainfall and/or runoff, which adds to the visual interest within the landscape. Additionally, there are stock tanks within the wash, which collect water and support a variety of typical wetland vegetation such as cattails and arrowweed.

The desert plains landscape located to the south of Centennial Wash is relatively flat approaching the Eagletail Mountains. This landscape consists of moderately dense cover of vegetation including palo verde trees, mesquite trees, ironwood trees, saguaro cactus, and brittlebush. The soils and small rock outcroppings are primarily tan interspersed with areas of gray/white. This landscape is considered to be Class B due to the diversity of vegetation, which adds visual interest in terms of contrasting colors and textures.

The Eagletail Mountains are located approximately 6 to 7 miles south of the proposed generating facility site. The Eagletail Mountains are considered Class A scenic quality because of the diversity in landforms, colors, and textures. Topography in the Eagletail Mountains "varies from flat or greatly undulating to strikingly incised and dissected." (Lower Gila South, [1985] BLM). This landform is a dominant feature in the landscape due to its distinctive ridgeline and dark brown colored rocks, which contrast with the adjacent tan soils.

Key Observation Points (KOPs)

There were five KOPs identified in the field including residences, highways, and recreation areas:

- KOP #1—Snowbird RV Park (high sensitivity)
- KOP #2—single residence south of the CAP Canal and west of Avenue 75E (high sensitivity)
- KOP #3—Interstate 10 eastbound approximately 1 to 2 miles from exit 69 at Avenue 75E (moderate sensitivity)
- KOP #4—Interstate 10 westbound approximately 1 mile from exit 69 at Avenue 75E (moderate sensitivity)
- KOP #5—Eagletail Mountain Wilderness access area (high sensitivity)

Middleground views (approximately 2.5 miles) of the proposed generating facility site from **KOP #1 – Snowbird RV Park** would be predominantly screened by the CAP Canal located 0.75 mile to the south. The canal is elevated approximately 15 feet above grade, reducing visibility of landscapes to the south. A 500kV transmission line is visible to the south from the RV park. The Little Horn, Big Horn, and Harquahala Mountains to the north and east are the dominant landscape features visible from the RV park. There are about 75 to 100 spaces available in the RV park, and they are primarily occupied from late fall to early spring.

KOP #2 - Single residence located approximately 1 mile north of the Interstate 10/Avenue 75E interchange has middleground views (approximately 1.75 to 2 miles away) of the generating facility site across open desert scrub and Interstate 10. Additionally, there are open views of the Eagletail Mountains to the south. Landscape modifications visible in the foreground from this residence including an existing 500kV transmission line, the CAP Canal, and the Interstate 10/Avenue 75E interchange. These modifications tend to be dominant in the landscape.

The generating facility site is viewed in the foreground to middleground (approximately 1 to 2 miles) while *traveling eastbound (KOP #3) and traveling westbound (KOP #4) along Interstate 10*. Views in both directions are not oriented toward the proposed generating facility site, however the site would be open when viewing south. The surrounding Little Horn, Big Horn, Eagletail and Harquahala Mountains are distinct landscape features visible in all directions from Interstate 10. Traffic volume is approximately 10,000 to 20,000 vehicles per day (ADOT, 1996). A large percentage of this is heavy truck/transport traffic. There are no special scenic designations for Interstate 10. Existing modifications visible in the landscape from Interstate 10 include the CAP Canal, 500kV transmission line, water recharge facility, and the Avenue 75E interchange.

Although *KOP #5 - Eagletail Mountains Wilderness access point* is located outside of the 2-mile sphere of influence, it was included in the inventory due to its high sensitivity. Dispersed viewers within the Eagletail Mountains Wilderness access (hikers, bikers, and off-road vehicles) have partially to fully screened background views (approximately 4.5 miles away) of the proposed generating facility site. The partial screening is due to the presence of small to medium height trees and shrubs. The primary focal point from this viewpoint is the Eagletail Mountains. User volume is relatively low since the access to the area is remote and orientation of views is to the south away from the proposed generating facility. Visible modifications from this KOP include the existing pipeline corridor, 500kV transmission line, Interstate 10, and CAP canal.

In addition to the KOPs described above, there were three additional viewing areas documented outside of the sphere of influence including Salome Road, the Eagletail Wilderness, and six residences to the southeast of the generating facility site.

Background views (approximately 4.5 to 5 miles away) from Salome Road are partially to fully screened due to the elevated nature of the CAP Canal and the existing 500kV transmission line dominating foreground views. Dispersed recreation users (e.g., hikers, backpackers, hunters) within the Eagletail Mountains have potential open to completely screened views of the proposed generating facility site as well as the pipeline corridor, existing 500kV transmission line, and Interstate 10. Views within the mountains are typically focused on features within the mountains or to adjacent mountain ranges. Six residences to the south of Centennial Wash have background views (approximately 4.5 miles away) of the proposed generating facility site. These views would be partially to fully screened due to the density of vegetation in Centennial Wash. Additionally, the Eagletail Mountains to the south are the focal point of the landscape from these residential views. Background views (approximately 4.5 miles away) are from the residences to the southeast of the generating facility site.

There are two areas near the intersection of Interstate 10 and Avenue 75East zoned for commercial and mixed use commercial/residential development. Views of the generating facility from these areas are range from open to partially screened due to surrounding vegetation and Interstate 10. The CAP Canal, existing 500kV transmission line, and Interstate 10 are all dominant features in the landscape visible in the foreground and middleground from these conceptual commercial/residential developments.

BLM VRM Classes

The proposed generating facility is not located on BLM land, except for the well field, which would be located on BLM VRM Class III landscapes. Allegheny is anticipating acquiring the 480 acres of land in Section 1, T2N, R11W through a land exchange with BLM. If the land exchange proceeds, the land would not fall under the jurisdiction the BLM VRM classification system. Landscapes to the south of the generating facility and well field managed by the BLM are also designated VRM Class III.

Proposed 500kV Transmission Line Interconnect (Route A)

The proposed transmission line interconnect consists of 1.5 miles of 500kV transmission line connecting with the existing Palo Verde-Devers line directly north of the generating facility site. Development and modifications surrounding the 2 miles of inventory area includes scattered residences, water recharge facility, CAP canal, Interstate 10, and interchange off Avenue 75E.

Scenic Quality

The proposed transmission line interconnect would cross scenic quality Class B agricultural landscapes and Class C desert scrub landscapes. Additionally, the proposed transmission line interconnect would cross Interstate 10 near the Avenue 75E interchange. Class B agricultural landscapes consist of dark green vegetation, which contrasts with the surrounding desert scrub landscapes adding to the visual interest within the landscape. Currently, the agricultural land is fallow and offers minimal diversity and scenic value (Class C scenic quality). The Class C desert scrub landscape is characterized by flat terrain with typical desert scrub vegetation primarily consisting of creosote and grasses. The darker green vegetation contrasts with the tan soils adding minimal diversity to this landscape. This desert scrub landscape is relatively indistinctive in terms of scenic quality within the northern Harquahala Valley.

KOPs

KOP #1 – Snowbird RV Park—The elevated nature of the CAP canal reduces visibility of landscapes to the south. Views toward the Eagletail Mountains consist of a perpendicular view of the existing Palo Verde-Devers 500kV transmission line (approximately 1 mile away) as well as Interstate 10 (approximately 2 miles away) and the Avenue 75E interchange. The proposed point of interconnection is approximately 1 mile south of KOP #1, thus being within foreground/middleground distance zones. Vegetation of the area consists of desert scrub flat terrain and does not offer additional screening potential.

KOP #2 – Single residence south of the CAP Canal and west of Avenue 75E—The proposed transmission line would be viewed in the foreground approximately 1,500 feet from the proposed point of interconnection. Modifications visible from this KOP include a 500kV transmission line Interstate 10 to the south, and the CAP Canal to the north. The landscape to the south is currently low-lying desert scrub, which consists of light green vegetation and medium/light tan soils.

The proposed 500kV transmission line interconnect would be located along the east side of Avenue and the Exit 69 interchange. The transmission line would be viewed in the foreground (0 to 1 mile) and middleground (1 to 3 miles) distance zones from **KOP #3 – Interstate 10 eastbound** and **KOP #4 – Interstate 10 westbound**. Views from Interstate 10 include several dominant mountains to the north (e.g., Little Horn, Big Horn, and Harquahala), as well as the Eagletail Mountains to the south. There are several modifications visible in the foreground from both directions of travel. These modifications include the Palo Verde-Devers 500kV transmission line, the CAP canal, water recharge facility, the Exit 69 interchange, and several small utility lines.

KOP #5 – Eagletail Mountain Wilderness access area—Background views (5+ miles) of the proposed 500kV transmission line interconnect from the Eagletail Mountain Wilderness access area would be partially to fully screened due to intervening vegetation. Views from this area are oriented to the south toward the Eagletail Mountains. Visible modifications include the pipeline corridor, Interstate 10, Palo Verde Devers 500kV transmission line, and the CAP Canal.

Other areas with potential views of the proposed 500kV transmission line interconnect include residences to the south of Centennial Wash and travelers on Salome Road. The CAP Canal and Palo Verde-Devers 500kV transmission line partially screen background views (approximately 4.5 to 5 miles away) of the proposed transmission line interconnect from Salome Road. Background views (approximately 4.5 to 5 miles away) from scattered residences south of Centennial Wash are partially to fully screened by dense vegetation within Centennial Wash.

The proposed 500kV transmission line interconnection would traverse north crossing over portions of a conceptually planned mixed use commercial/residential (RV and mobile home park) development designated by La Paz County in 1986 (see Exhibit A-4). Currently final development plans have not been submitted. Views of the proposed transmission line from the commercial area would be open and views from the residential would be partially screened by the commercial development. The CAP Canal, existing 500kV transmission line, and Interstate 10 are all dominant features in the landscape visible in the foreground and middleground from these conceptual commercial/residential developments.

BLM VRM Classes

The proposed 500kV transmission line interconnect does not cross any lands managed by BLM. Landscapes to the south managed by BLM are designated VRM Class III.

Proposed Natural Gas Pipeline Lateral (Route B)

Scenic Quality

The proposed natural gas pipeline lateral crosses approximately 3 miles of Class B desert plains, 0.5 mile of Class B Centennial Wash, and 2 miles of Class C desert scrub landscapes.

KOPs

KOPs #1 and #2 would not have views of the pipeline due to intervening structures, terrain, and vegetation.

The proposed pipeline lateral would be visible in the middleground (1-3 miles away) and background (3-5.5 miles away) when viewing south from **KOP #3 – Eastbound Interstate 10 and KOP #4 – Westbound Interstate 10**. Views from these KOPs would be partially to fully screened due to intervening vegetation (depending upon location of view from the roadway) and are not oriented toward the proposed pipeline lateral. The Eagletail Mountains are a dominant landscape feature when viewing to the south from these KOPs.

The proposed pipeline lateral would be visible in the background (4+ miles away) when viewing north from **KOP #5 – Eagletail Mountain Wilderness**. Views would be open to fully screened depending upon viewing location within the wilderness. Views to various landscape features (e.g., Courthouse Rock) within the wilderness are the focal point from this KOP.

BLM VRM Classes

The proposed pipeline lateral does not cross any lands managed by BLM. Landscapes to the west of the proposed pipeline lateral that are managed by BLM are designated VRM Class III.

ASSESSMENT METHODOLOGY

The assessment of potential significant impacts on visual resources resulting from the proposed project was based on the evaluation of visual contrast as defined by the Visual Resource Inventory and Contrast Rating System (BLM 8400 Series Manual 1986).

Visual contrast is a measure of the perceptible level of change to landscape scenic quality and views from KOPs resulting from the proposed project. Viewing variables affecting visual contrast include vegetation or terrain screening, atmospheric conditions, daytime vs. nighttime conditions, and visual absorption capability (VAC). VAC is defined as the extent to which the complexity of the landscape can absorb changes without affecting the overall visual character. Visual simulations were prepared using photography and computer-generated three-dimensional models to assist in determining visual contrast levels.

There were four visual contrast (modification) levels established for this project, as described below.

Not Noticeable—Changes in the landscape scenery or views that would not be evident (weak contrast) unless pointed out due to such factors as previous disturbance, distance, terrain and vegetation screening, dominance of adjacent landscape features, and visual absorption due to background terrain. Changes typically would be viewed in the background and would be unobstructed. However, middleground views may be included that are partially screened or foreground views that would be completely screened.

Noticeable—Changes in the landscape scenery or views that would be evident (weak/moderate contrast) but visually subordinate to the setting due to the factors described above. These changes may attract slight attention, but would not compete with adjacent landscape scenery or views. Changes typically would be viewed in the middleground or background and would be unobstructed. However, foreground views may be included that would be partially screened.

Co-dominant—Changes in the landscape scenery or views that would attract attention (moderate contrast) and begin to compete with adjacent landscape scenery or views. Changes typically would be viewed in the middleground and would be unobstructed or partially screened in the foreground.

Dominant—Changes in the landscape scenery or views that would become the focal point or most significant (strong contrast) feature in the setting. Changes typically would be viewed in the foreground, be unobstructed, and in extreme cases may be partially screened. Such changes often cause a lasting impression when viewed in the landscape.

The severity of impacts is determined by combining the landscape scenic quality classes and viewer sensitivity levels for KOPs, determined in the inventory with the visual contrast/modification levels described above. Tables E-1 and E-2 summarize the impacts in terms of high, moderate, and low levels.

There are four VRM classes (I, II, III, IV). Inventory Class I is assigned to special areas that are designated to maintain the naturalistic landscape. Classes II, III, and IV are based on three classifications; scenic quality, sensitivity level, and distance zones. A brief description of the VRM Classes is as follows:

- Class I—provides primarily for natural ecological changes

- Class II—changes in any of the basic elements should not be evident
- Class III—changes in the basic elements may be evident, but should remain subordinate
- Class IV—changes may subordinate original composition, but must reflect natural occurrence

Table E-3 summarizes compliance with BLM VRM Classifications.

TABLE E-1 SCENIC QUALITY IMPACT LEVELS			
Visual Contrast or Modification Levels	Scenic Quality Class		
	Class A	Class B	Class C
<i>Not Noticeable</i>	Moderate	Low	Low
<i>Noticeable</i>	Moderate	Moderate	Low
<i>Co-dominant</i>	High	Moderate	Low
<i>Dominant</i>	High	High	Moderate

TABLE E-2 KOP (VIEWER) IMPACT LEVELS			
Visual Contrast or Modification Levels	Viewer Sensitivity		
	High	Moderate	Low
<i>Not Noticeable</i>	Low	Low	Low
<i>Noticeable</i>	Moderate	Moderate	Low
<i>Co-dominant</i>	High	Moderate	Low
<i>Dominant</i>	High	High	Moderate

TABLE E-3 COMPLIANCE WITH BLM VRM CLASSIFICATIONS				
Visual Contrast or Modification Levels	VRM Class			
	Class I	Class II	Class III *	Class IV
<i>Not Noticeable</i>	Yes	Yes	Yes	Yes
<i>Noticeable</i>	No	Yes	Yes	Yes
<i>Co-dominant</i>	No	No	Yes /No**	Yes
<i>Dominant</i>	No	No	No	Yes/No**

* There are only VRM Class III landscapes in the region of influence
 ** Compliance may depend upon implementation of mitigation measures to reduce visual contrast

There are four main components of the proposed project including the (1) generating facility, (2) 500kV transmission line interconnect, (3) 500kV switchyard, and (4) pipeline lateral. Each of the components have several features, which individually or in combination could result in impacts to visual resources. The features and their approximate dimensions are described below.

Generating Facility

- Combustion turbine and air inlet - approximately 75 feet high

- HRSG structure - approximately 106 feet high
- HRSG exhaust stack - approximately 150 feet high
- Steam turbine and generator - approximately 40 feet high
- Cooling towers - approximately 50 feet high
- Administration building - approximately 50 feet high
- Storage tanks - approximately 35 to 40 feet high
- Vapor plumes from cooling towers - variable dependent upon temperature and humidity

500kV Transmission Line

- Dulled finish steel lattice or single pole structures, approximately 120 to 130 feet high
- Non-reflective conductor (wires) and static lines

500kV Switchyard

- Chain link fence surrounding approximately 20 acres, approximately 6 to 10 feet high
- Switchyard equipment (variable) - approximately 20 to 120 feet high

Gas Pipeline Lateral

- Underground with approximately 50 feet of soil and vegetation disturbance

Mitigation Measures

The following mitigation measures will be implemented to reduce visual contrast resulting from the proposed project:

1. Landscaping at generation facility site (a conceptual landscape plan is in development)
2. Neutral color schemes for generation facility equipment
3. Revegetation of disturbed areas
4. Non-reflective steel for the transmission line/switchyard structures and conductors
5. Directive and shielding devices for lights required at the generation facility site, as well as motion detectors/electronic sensors for lights not needed for operational or safety reasons

ASSESSMENT RESULTS

Impacts on visual resources resulting from the proposed project are characterized as short-term during construction and long-term during operation and maintenance over the life of project. There would not be any high impacts on scenic quality or views for the proposed project. Impacts on scenic quality in the

project area would be moderate to low because of (1) the predominance of landscapes with minimal or average scenic quality, (2) the existing presence and potential presence of other industrial facilities (e.g., the existing 500kV transmission line, water recharge facility, and CAP Canal) and (3) the distant mountains, attracting the viewers attention away from the proposed project.

Impacts on views would range from moderate to low because of: (1) mitigation measures to reduce visual contrast of the proposed project, (2) screening from intervening vegetation, terrain, and structures, (3) distant views beyond 1 mile and relatively short viewing duration, and (4) the existing presence and potential presence of other industrial facilities (e.g., the existing 500kV transmission line, water recharge facility, and CAP Canal).

Generating Facility Site

Scenic Quality

Modifications would range from *not noticeable* to *noticeable* primarily due to surface disturbance (soils and vegetation) and the introduction of industrial facilities into a scenic quality Class C desert scrub landscape at the proposed generating facility site. Impacts would be low after the implementation of mitigation measures 1 through 3 to reduce visual contrast.

KOPs

The proposed generating facility would be a *noticeable* feature in the landscape when viewed from **KOP #1 – Snowbird RV Park** (high sensitivity) approximately 2.75 miles away. The upper portions HRSGs (approximately 106 feet high) and exhaust stacks (approximately 150 feet high) would be the most visible due to their height. Overall, potential impacts would be moderate to low. Visibility of the generating facility site is limited due to the height of the flood control levee and CAP Canal located south of the RV Park. The existing Palo Verde-Devers 500kV transmission line parallels the landscape between the CAP Canal and Interstate 10, which would further reduce visual contrast of the proposed generating facility from this viewpoint. The most noticeable feature would be the presence of the lighting during the nighttime hours. However, impacts would be minimized with the application of mitigation measure 5.

The proposed generating facility would be *co-dominant* to *noticeable* from **KOP #2 – Single resident south of the CAP Canal and west of Avenue 75E** (high sensitivity). The HRSGs (approximately 106 feet high) and exhaust stacks (approximately 150 feet high) would be the most visible due to their height. Overall, potential impacts would be moderate with the application of mitigation measures 1 through 4 (Figure E-2). Views of the generating facility would be partially screened by Interstate 10, the Palo Verde-Devers 500kV transmission line, and low-lying terrain/vegetation. The Eagletail Mountains to the south are the dominant feature in the landscape when viewed from this KOP and would remain so after construction of the generating facility. Additionally, the Little Harquahala, Harquahala, and Bighorn Mountains are dominant landscape features visible to the north. Lighting would be the most noticeable feature of the proposed generating facility during nighttime hours. However, impacts would be minimized with the application of mitigation measure 5.

The proposed generating facility would be a *co-dominant* feature in the landscape when viewed from Interstate 10, **KOP #3 (eastbound, moderate sensitivity) and KOP #4 (westbound, moderate sensitivity)**. The generating facility would be approximately 1 mile from the facility at its closest point. Impacts from Interstate 10 would be moderate since it is not considered a scenic route and after the application of mitigation measures 1 through 4 Figures E-3 and E-4). Visible night lighting would be the most

Figure E-2

Figure E-3a

Figure E-3b

Figure E-4a

Figure E-4b

noticeable feature of the proposed generating facility. However, impacts would be minimized with the application of mitigation measure 5.

The proposed generating facility would range from *not noticeable* to *noticeable* feature in the landscape when viewed from **KOP #5 – Eagletail Mountains Wilderness access area** (high sensitivity) approximately 4 miles away (Figure E-5) Impacts resulting from the facility would be moderate to low primarily due to the distance and partial vegetation screening. The Eagletail Mountains would remain the most dominant feature in the landscape after the application of mitigation measures 1 through 5. The proposed generating facility would be visible at night due to lighting, however use of this access is primarily during daytime hours.

Remaining impacts on other viewing areas such as Salome Road, six residences to the southeast of the generating facility site, and Eagletail Wilderness would be low. The generation facility would range from *noticeable* to *not noticeable* due to viewing distances beyond 4 miles and partial to full screening from adjacent terrain and vegetation.

Vapor plumes emanating from the cooling towers would only occur under ideal conditions (i.e., low temperature and high humidity). Vapor plumes would be *noticeable* to *co-dominant* from the KOPs and other viewing areas when present. However, vapor plumes would occur infrequently (approximately 1 percent of the daytime hours) and would result in low impacts.

Impacts to views from future commercial and mixed use areas 0.5 to 1 mile north of the generating facility would be low after the application of mitigation measures 1 through 5.

BLM VRM Classes

The generating facility would not impact BLM VRM classifications, since it is located on private land. The well field would not affect BLM VRM classification after the Allegheny acquires the 480 acres of BLM land in Section 1, T2N, R11W through the land exchange. However, the well field would be in compliance with BLM Class III landscapes since there would be minimal disturbance and visibility would be low.

Proposed 500kV Transmission Line Interconnection (Route A) and 500kV Switchyard

Scenic Quality

The proposed 500kV transmission line interconnect and switchyard would range from *noticeable* to *co-dominant* in Class B agricultural landscapes and Class C desert scrub landscapes. Impacts would be moderate when crossing the Class B agricultural landscapes and low when crossing the existing Class C desert scrub landscapes. Impacts would be low when crossing future conceptually designated commercial developments located along the east side of Avenue 75 East near the Exit 69 interchange.

KOPs

The proposed 500kV transmission line interconnect and switchyard would range from *not noticeable* to *noticeable* when viewed from **KOP #1 – Snowbird RV Park** (high sensitivity) approximately 1 mile away. Views would be partially screened by the CAP Canal and Palo Verde-Devers 500kV transmission line. Impacts would be moderate to low depending upon viewer orientation within the RV park and after the application of mitigation measure 4.

Figure E-5

The proposed 500kV transmission line interconnect and switchyard would be *co-dominant* when viewed from **KOP #2 – Single resident south of the CAP Canal and west of Avenue 75E** (high sensitivity) approximately 0.25 mile away. Impacts would initially be high to moderate due to the proximity of the features (the Palo Verde-Devers 500kV transmission line is located in the immediate foreground views of this residence); however, impacts would be reduced to moderate after the application of mitigation measure 4. Potential for commercial development less than 0.75 mile south of KOP #2 would reduce impacts resulting from the proposed 500kV transmission line interconnection as well.

The proposed 500kV transmission line interconnect and switchyard would be *noticeable to co-dominant* when viewed from **KOP #3 – Interstate 10 eastbound** (moderate sensitivity) **KOP #4 – Interstate 10 westbound** (moderate sensitivity) approximately 1 to 2 miles away. The proposed 500kV transmission line interconnect crossing over Interstate 10 would be the most visible segment from each KOP. Impacts would be moderate due to the relatively short viewing duration and presence of existing modifications in the landscape, including the interchange and Palo-Verde Devers 500kV transmission line. Mitigation measure 3 would reduce the overall visual contrast within these views.

The proposed 500kV transmission line interconnect and switchyard would not be *noticeable* when viewed from **KOP #5 – Eagletail Mountain Wilderness access area** (high sensitivity) approximately 6 to 7 miles away. Impacts would be low after the application of mitigation measure 3.

Impacts resulting from the proposed 500kV transmission line interconnection on views from two conceptually planned commercial and mixed use commercial/residential areas would range from moderate to low. Low impacts would result to views from the future commercial development and moderate impacts would occur to the future residential (RV/mobile home park) development. Views of the proposed transmission line from the future residential area would be partially screened by the future commercial development (see Exhibit A-4).

BLM VRM Classes

The proposed 500kV transmission line interconnection and switchyard would not impact BLM VRM classifications, since it is located on private land and State land.

Proposed Natural Gas Pipeline Lateral (Route B)

Scenic Quality

The proposed pipeline lateral would be *noticeable* where it crosses Class C desert scrub landscapes to *co-dominant* where it crosses Class B Centennial Wash and desert plains landscapes south of Centennial Wash. Impacts would be low in the Class C landscapes and moderate in the Class B landscapes after the application of mitigation measure 3. Disturbance to Centennial Wash would be minimal since it will be crossed via directional boring.

The proposed pipeline lateral would be *not noticeable* from **KOPs #1 (high sensitivity), #2 (high sensitivity), and #3 (moderate sensitivity)**, therefore impacts would be low. The proposed pipeline lateral would be noticeable from **KOP #4 (moderate sensitivity)**, however impacts would be low due to the short duration. The proposed pipeline lateral would be noticeable from **KOP #5 (high sensitivity)**, therefore impacts would be moderate.

BLM VRM Classes

The proposed pipeline lateral would not impact BLM VRM classifications, since it is located on private land.

Impacts to visual resources resulting during construction of the proposed project would range from moderate to low depending upon the presence of large scale construction equipment, dust, and lighting. Impacts would be short-term lasting from 18-24 months. Moderate impacts would primarily be from the nearest residence and Interstate 10. The remaining impacts would be low due to distance and screening from intervening terrain and vegetation. Mitigation measures such as lower cranes and scaffolding when not in use, use of dust control/suppressants (e.g., application of water), and using directive and shielding devices on lighting will help reduce the potential for impacts to visual resources.

CONCLUSIONS

The proposed project would not result in adverse impacts on visual resources. Impacts on scenic quality would be low in Class C desert scrub landscapes and moderate in Class B agricultural landscapes. Impacts on views from the nearest residence would be moderate considering the immediate foreground presence of the Palo Verde-Devers 500kV transmission line and after the application of mitigation measures. Impacts on views from recreation areas (e.g., Eagletail Mountains Wilderness) would be moderate to low since the views are located beyond 5 miles from the project and are partially to fully screened by terrain and vegetation. Impacts on views from Interstate 10 would be moderate since it is not a designated scenic route and is heavily influenced by other industrial facilities and the presence of numerous large trucks on the roadway. Overall visual impacts would be lower than those typically expected for a generating facility and 500kV transmission line interconnection.

HISTORIC SITES AND STRUCTURES AND ARCHAEOLOGICAL SITES

Methods

A cultural resources review was undertaken to address whether any archaeological sites or historic structures are present near the project area and how they might be affected by the proposed construction of the La Paz Generating Facility. The study was based on existing information from prior studies within about 2 miles of the proposed facilities. Maps, records, and files were reviewed at the following agencies and institutions:

- State Historic Preservation Office
- Arizona State Museum
- Department of Anthropology at Arizona State University
- State Office, Phoenix Field Office, and Yuma Field Office of the Bureau of Land Management

Findings

The results of the record search are summarized in this section. The complete technical report is included in Exhibit B-2.

Human societies have lived in Arizona for at least 10,000 years and perhaps longer. The earliest groups lived by hunting game and collecting indigenous plant foods. Populations remained small and dispersed

for thousands of years during the Paleoindian and Archaic periods. Approximately 2,500 years ago, some occupants of the region adopted an agricultural way of life and began to grow crops such as corn, beans, squash, and cotton along drainages where sufficient water was available. The regional population began to grow and large, permanent villages appeared, primarily in valleys with surface water supplies. There is little evidence for large villages in more arid locations like west-central Arizona. Archaeological sites in these arid desert areas are usually scatters of artifacts that are the remains of briefly used camps and hunting and gathering locations.

When Europeans first arrived in the region they found numerous groups involved in complex trading and raiding relationships (Doyel 1989). Yuman-speaking Yavapais inhabited much of west-central Arizona north of the Salt and Gila rivers, O'odham groups lived south of the Gila River. Groups that came to be known as the Maricopa lived along the lower Gila and Colorado River valleys. In the nineteenth century the Maricopas moved east up the Gila River to join the Akimel O'odham (Pima). Apache bands inhabited the mountains east of the Phoenix area.

Euro-Americans found little of interest in the arid desert of west-central Arizona until precious minerals were discovered in some of the mountain ranges that dot the landscape. Spaniards reportedly found gold in the Harquahala Mountains as early as 1762, but no evidence of mining or settlement from that era has been found. After the United States acquired the territory, the mining camps of Harquahala and Harrisburg were established in the 1860s and 1880s some 15 to 17 miles north of the proposed La Paz Generating Facility. Harrisburg warranted a post office from 1880 to 1906, and Harquahala "boomed" in 1888, but most of the claims were exhausted in less than a decade. The community had a post office from 1891 to 1918. The mines were largely exhausted by the turn of the century but were sporadically worked into the 1930s.

Euro-Americans first established ranches in the Harquahala Plain in the late nineteenth and early twentieth centuries. E.H. Winters owned a ranch from 1885 to 1925, and was later memorialized when the town of Wintersburg was established near a well on the ranch. Wintersburg warranted a post office between 1930 to 1941, and a post office was established in Tonopah in 1934. There was a flurry of homesteading in the Palo Verde Hills area between the 1920s and the mid-1940s. The earliest of these were World War I veterans who had hopes of receiving government-sponsored aid for irrigation projects. Most attempts to rely on floodwater farming and wells failed, and most homesteaders who managed to obtain patents left after establishing their claims. Large, successful farms were developed on the Harquahala Plain only after World War II when deep wells made irrigation possible.

The record search identified and assessed information about archaeological and historical studies that have been conducted in conjunction with planning eight previous projects within 2 miles of the proposed La Paz Generating Facility. The most extensive studies were conducted during the planning of the Hayden-Rhodes Aqueduct (formerly known as the Granite Reef Aqueduct), a component of the Central Arizona Project. Other studies were conducted for the planning of the Palo Verde-Devers 500-kV transmission line, pipelines, a fiber optic cable, a road, and sale of state land.

These studies discovered and recorded six archaeological sites within the 33-square-mile record search area, but none are within the footprint of the proposed project facilities. All of the sites reflect aboriginal use of the region, but none of the sites yielded materials that could be chronometrically dated. The pottery at one site suggests a date of occupation between approximately AD 700 and 900, and another between AD 700 and 1050. One site also has some historic era trash of undetermined origin.

The sites are all quite simple, consisting of only a few artifacts and simple rock alignments that may be remnants of temporary shelters, as well as rock clusters, some of which may be remnants of hearths or cooking pits. The sites are primarily confined to the surface of the ground and extensive buried

archaeological deposits have not been found at these types of sites. As a group, the sites seem to reflect sporadic exploitation of the natural resources of the region, and probably are related to hunting game or collecting and processing indigenous plant foods such as mesquite and palo verde seeds and cactus fruits. Other types of archaeological sites reported in the region include petroglyphs and trails visible across areas of desert pavement, as well as historic trash dumps and remnants of historic farmsteads.

An ethnographic study was conducted in support of the planning of the Palo Verde-Devers transmission line (Bean and Vane 1978). Maricopas and Yavapai who were interviewed identified traditional cultural associations with the Little Horn Mountains, Eagletail Mountains, and Courthouse Rock. Yavapai also identified plants traditionally used for food and medicine in the creosote bush vegetation communities of the Ranegras Plain and Harquahala Plain. The proposed La Paz Generating facility is on the Harquahala Plain and will result in some disturbance of native vegetation although much of the project area has already been altered by agricultural development. The project is not expected to have impacts on any of the other places identified as having traditional cultural associations.

GLO first surveyed the area in 1914, 1915, and 1934. These relatively late dates reflect the lack of interest in settlement and development of this arid, remote area. Only a few cultural features are depicted on the GLO plats, including a dry well (1914), and a couple of houses and one outbuilding (1934). Numerous road segments also are mapped, but only one of these is named. That road is identified as running between Phoenix and Harrisburg.

In summary, the early GLO plats indicate little historical development of the region. Only two cultural features are within the footprint of the proposed La Paz Generating Facility. One of the houses depicted on the 1934 plat is within the proposed well field, but whether any evidence of this building remains intact is not known. The proposed natural gas pipeline lateral would cross the alignment of an unnamed road that was depicted on the 1914 GLO plat running along Centennial Wash. Floods may very well have obliterated evidence of this road at this crossing.

CONCLUSIONS

The record search indicates that archaeological and historical resources are not abundant in the vicinity of the proposed La Paz Generating Facility, and the archaeological sites that have been found in the region are relatively small and simple, reflecting limited aboriginal exploitation of the Harquahala Plain. Although the prior archaeological and historical studies have encompassed very little of the footprint of the proposed La Paz Generating Facility, they constitute approximately a 10 percent sample of the record search area and suggest an average of about 1 to 2 archaeological sites per square mile can be expected. The footprint of all the project facilities would encompass 1.5 to 2.0 square miles. Therefore, it can be estimated that about 1 to 4 archaeological sites might be present within the footprint of the project facilities.

Allegheny is planning to have an intensive survey conducted to further assess potential effects on archaeological and historical sites. The survey findings would be considered as project planning proceeds. If significant archaeological or historical sites are present in the well field or along the proposed transmission line interconnect corridor, there is good potential to avoid direct impacts by minor project design modifications. If significant resources could not be avoided, those impacts would be mitigated by undertaking studies to recover important information prior to construction.

REFERENCES

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