

EXHIBIT H

EXHIBIT H – EXISTING PLANS

As stated in R14-3-219, Exhibits to Application, Exhibit H of the Rules of Practice and Procedure Before Power Plant and Transmission Line Siting Committee:

“To the extent applicant is able to determine, state the existing plans of the state, local government, and private entities for other developments at or in the vicinity of the proposed site or route.”

The following sub-exhibits include information responsive to ACC Rules of Practice and Procedure R14-3-219, Exhibit H. Exhibit H-1 contains analysis of the existing land uses, land use plans, and any known development plans in the study area of the CEC Proposed Route and CEC Substations, as well as the anticipated impacts of the Project on those land uses and plans. Existing land uses are mapped in Exhibit A-3 and future land uses are mapped in Exhibit A-4.

Exhibit H-1	Existing Plan Analysis
-------------	------------------------

EXHIBIT H-1 – Existing Plan Analysis

INTRODUCTION

The CEC Proposed Route is comprised of the CEC New Build Route and the CEC Upgrade Route. The CEC New Build Route consists of (i) approximately 66 miles of new double-circuit 345-kV transmission line in a new 200-foot-wide ROW, which would terminate at a new substation to be owned by Southline near the existing AEPCO Apache Substation,¹ and (ii) less than 1 mile of 115-kV or 230-kV transmission line and associated facilities needed to connect the proposed Southline Apache Substation to the AEPCO Apache Substation. The CEC New Build Route footprint includes a 200-foot right-of-way (“ROW”) for the new line.

The CEC Upgrade Route consists of approximately 5 miles of new non-WAPA owned 138-kV and 230-kV transmission lines and associated facilities that would interconnect the upgraded WAPA 230-kV Apache-Tucson and Tucson-Saguaro transmission lines to four existing substations owned and operated by other Arizona load-serving utilities: (a) approximately one mile of 230-kV transmission line and associated facilities to interconnect the AEPCO Pantano Substation, (b) approximately two miles of 230-kV transmission line and associated facilities to interconnect the TEP Vail Substation, (c) less than one mile of 138-kV transmission line and associated facilities to interconnect the TEP DeMoss Petrie Substation, and (d) approximately 1.5 miles of 230-kV transmission line and associated facilities to interconnect the TEP Tortolita Substation.² The CEC Upgrade Route includes a 150-foot ROW the lines.

The geographic scope for the land use study area includes a 2-mile corridor around the CEC Proposed Route and CEC Substations, as well as access roads and staging areas that are proposed outside of the 2-mile corridor.

The Project will traverse federal, state, and local agency jurisdictions with existing land use plans and policies (*see* Exhibit A-2, Land Ownership and Jurisdiction). Private land will also be traversed by the Project. Various land management agencies in this region have jurisdiction over land development activities. Land use jurisdiction refers to the

¹ The existing Apache Substation is owned and operated by AEPCO. Southline proposes to construct a new substation (“Southline Apache Substation”) located near the AEPCO Apache Substation that would connect the New Build Section of the Project to the AEPCO Apache Substation and to the Upgrade Section of the Project. See Application at Section 4.b.i.(3) for additional details.

² See Application at Section 4.b.i.(3) for additional details on the Pantano, Vail, DeMoss Petrie, and Tortolita substations.

limits of administrative authority maintained by federal, state, regional, or local government agencies responsible for land use planning and policies. A summary of surface management and land ownership in the study area is presented in Table H-1.

Table H-1. Surface Management and Land Ownership
Within the Study Area

Entity	Acres
Bureau of Land Management	38,472
Department Of Defense	8,867
Bureau of Reclamation	1
State	77,367
County	2
Private	87,009

As stated in the Arizona ACC Rules of Practice and Procedure R14-3-219, the analysis in this Exhibit focuses on state, local, and private existing uses and land use plans; however, an extensive discussion of the federal jurisdictions land use regulations, policies, and plans in the study area can be found in Exhibit B-1, Final EIS Section 3.11.

Prior to and during the EIS process, the Southline team met with agencies, representatives, and local stakeholders. These outreach efforts are detailed in Exhibit J-2.

LAND USE PLANS; DEVELOPMENT PLANS

State and local agency jurisdictions that will be traversed by the Project have adopted land use plans and regulations that guide the type, time, and intensity of land use. An inventory of applicable land use plans was conducted to determine which land use plans may intersect with the Project. State and local jurisdictions with land use policies in the study area include Cochise, Pima, and Pinal counties, the cities of Wilcox and Tucson, and the Arizona State Lands Department (“ASLD”).

I. LOCAL GOVERNMENT PLANS

A. Cochise County Comprehensive Plan

The Cochise County Comprehensive Plan, amended through 2015, sets forth goals, objectives, and policies to control development within the county. The plan includes growth area categories and other plan designations, as well as a land use element plan

map. The majority of the CEC New Build Route and Apache Substation study area lands are classified as Category D-Rural, with the exception of segments P6b and P7 study area lands classified as Category C-Rural Community outside of the communities of Bowie and Willcox (*see* Exhibit A-4). Category D-Rural lands are characterized by a “low rate of growth; unimproved roads; low density, large lot rural residential development; agricultural production; and large tracts of undeveloped private and public lands” and Category C-Rural Community areas are characterized by a “slow rate of growth and the desire to maintain the existing neighborhood or rural atmosphere” (Cochise County 2015a). As shown on Exhibit A-4, the CEC New Build and Apache Substation study area includes rural, low density residential, agricultural and/or green space, developing, neighborhood conservation, enterprise redevelopment, and neighborhood rehabilitation; however, the alignment of traverses lands in Cochise County designated as Rural.

The plan contains no specific regulations governing transmission projects (Cochise County 2015a); however, the 2015 amendments specified a Renewable Energy Element, and identifies areas of the County that are suitable for utility-scale solar facilities. No proposed Project activities will conflict with other goals and objectives of the plan. Specific goals and policies that support the Renewable Energy Element include and are applicable to the CEC Proposed Route include:

Goal

1. Support the development of local renewable energy projects and technologies.

Policies

- a. Encourage utility-scale renewable energy projects, using the University of Arizona's Renewable Energy Opportunity Analysis and other resources as a guide for determining the suitability of proposals in any one location.
- b. Encourage renewable energy business development.
- c. Support renewable energy employment training opportunities at local colleges.
- d. Permit flexible site development standards.

The CEC New Build Route begins in Cochise County on BLM-managed lands, located parallel to existing utilities' ROW. The areas that are crossed by the CEC New Build Route and the Apache Substation have been identified in the Comprehensive Plan as 'Category D - Rural Areas' (Cochise County 2015b) (*see* Exhibit A-4). Category D - Rural Areas is defined as “the outlying rural areas between cities and unincorporated

communities and characterized by a low rate of growth; unimproved roads; low density, large lot rural residential development; agricultural production; and large tracts of undeveloped private and public lands. Non-residential development is geared toward providing local services, tourism or intensive uses that are not appropriate in more the densely populated parts of the county, such as power plants and feedlots,” (Cochise County 2015a). Category D Rural Areas include those areas presently identified as “Category D” and all areas that do not meet the criteria for inclusion in either Category A, B or C.

Article 20, Section 2002.02 of the Cochise County Zoning Regulations specifically exempts transmission lines for the distribution of franchised public or private utilities from requirements for building or use permits. Only an informational permit is required, along with a ROW permit for encroachment on county-maintained roads and/or properties. A Franchise Utility Agreement may also be necessary, which is reviewed by the County Board of Supervisors. More substantial structures with a potential to impact the surrounding community, such as substations, are not exempt and must be located so as to minimize any adverse impacts generated by that structure. All such structures, however, are exempt from minimum site area requirements of the applicable zoning district, provided there is an adequate site area to minimize any adverse impacts of such use.

No proposed Project activities will conflict with other goals and objectives of the plan.

B. Pima County Comprehensive Plan

The Pima County Comprehensive Plan (2009, as amended 2015) is currently being updated via the “Pima Prospers: Pima County Comprehensive Plan Initiative.” The Plan assigns special designations (including parks, open space, and scenic road designations) and lays out policies for land uses within those unincorporated areas of the County; for incorporated areas, land use planning as specified in the municipalities’ general plan is applicable. The 2015 plan, as amended is the current guiding plan.

The Pima County Zoning Ordinance designates zoning districts and establishes a land use intensity map. The ordinance, however, does not specifically address transmission of electricity, although electrical transmission requires a Conditional Use Permit under some zoning districts (Pima County 1992, 2011). The CEC Proposed Route will require a conditional use permit for portions of the Project that occur on county lands, as appropriate. Modifications to existing permits or new permits as may be required for electrical substations over 115 kV will be coordinated by the Pima County Development

Services Department. All of the substations included in the CEC Proposed Route within Pima County are existing facilities that will be expanded. Southline will work with Pima County during the permitting phase of the Project to ensure compliance with applicable plans and zoning requirements of the Pima County Comprehensive Plan.

In the CEC Upgrade study area, the Vail interconnection and CEC substation expansions at DeMoss Petrie, Vail, and Pantano occur within the Pima County Comprehensive Plan planning area. Classification (*i.e.*, land use intensity) of Pima County planning area lands within the study area for the CEC Upgrade Route is City of Tucson; classification for the Pantano Substation is RS-Resource Sensitive; for the CEC Vail and DeMoss Petrie Substations, classification is City of Tucson (*see* Exhibit A-4).

The objective of RS-Resource Sensitive is to designate key larger parcels and land holdings with environmentally sensitive characteristics in close proximity to public preserves or other environmentally sensitive areas. Development of such land shall emphasize design that blends with the surrounding natural desert and provides connectivity to environmentally sensitive linkages in developing areas. The Pantano Substation is located approximately 1 mile southwest of Cienega Creek.

The objectives for City of Tucson classifications is to apply the City of Tucson's municipal planning land use classifications as provided in the City's General Plan. Generally, the objectives provide higher density residential neighborhoods, commercial services, and typically includes significant changes to the natural environment in terms of grading, drainage patterns, wildlife, and native vegetation; *see* below.

Zoning classification of the CEC Upgrade Route and CEC Substation expansions in Pima County include: Rural Homestead ("RH") and Heavy Industrial Zone ("I-2"). The objectives for RH are intended to preserve the character and encourage the orderly growth of rural areas. It is intended to encourage rural development in areas lacking facilities for urban development and to provide for agriculture, commercial, and industrial development only where appropriate and necessary to serve the needs of the rural area. The objectives for I-2 are to provide for industrial uses that are generally nuisances, making them incompatible with most other land use. These nuisances may be in the form of air pollutants; excessive noise, traffic, glare, or vibration; noxious odors; the use of hazardous materials; or unsightly appearance. Select other agriculture, civic, commercial, industrial, retail, storage, utility, and wholesaling uses may also be permitted (Pima County 2015).

C. Pima County Sonoran Desert Conservation Plan

Pima County maintains important biological, ecological, and natural resources under their 2012 Sonoran Desert Comprehensive Plan (“SDCP”). The 2012 SDCP is guiding regional efforts to conserve the best lands and most precious resources for future generations of Pima County residents to enjoy. As part of the SDCP, the associated Pima County Multi-species Conservation Plan (“MSCP”) combine short-term actions with long-range land-use decisions in Pima County, to avoid, minimize, and mitigate impacts to species protected under the Endangered Species Act (“ESA”) and their habitats. Pima County submitted the MSCP to the U.S. Fish and Wildlife Service (“FWS”) for 44 species that may be impacted as a result of the otherwise lawful activities of Pima County and its development community (Pima County 2012). Further discussion of the SDCP and MSCP can be found in Exhibit B-1, Final EIS Section 3.8.

The SDCP designates a Conservation Lands System (“CLS”), which identifies lands within Pima County necessary to achieve the SDCP goals, while delineating areas suitable for development. The CLS land-use policies apply only to discretionary actions of and lands owned and/or managed by the Pima County and the Pima County Regional Flood Control District Boards. CLS policies do not apply to privately owned lands unless the landowner takes it upon themselves to adopt CLS land-use policies. CLS lands include important riparian areas, biological core management areas, special species management areas, multiple use management areas, scientific research areas, agricultural inholdings, and critical landscape connection corridors. The Pantano Substation expansion area occurs within the CLS lands on state lands. CLS lands are further discussed in Exhibit B-1, Final EIS Section 3.12.

The study area for the Pantano Substation expansion includes a small portion of the Pima County Cienega Creek Natural Preserve and the Bar V Ranch property. The 1994 Cienega Creek Natural Preserve Management Plan was drafted by the Pima County Regional Flood Control District to manage the 3,979-acre Cienega Creek Natural Preserve, located along Cienega Creek in eastern Pima County. The principal management objectives are to preserve and protect perennial stream flow in Cienega Creek, preserve and protect the existing natural riparian community along the stream corridor, and to provide opportunities for the public use of the preserve (McGann and Associates 1994).

The Bar V Ranch property, which includes 14,400 acres of fee and grazing lease lands acquired by Pima County in 2005, includes a significant portion of Davidson Canyon—a

rare confluence of desert and riparian habitat that contains a stretch of perennial water and provides habitat for numerous vulnerable species (Pima County 2004). The northernmost fee parcel connects to the Cienega Creek Natural Preserve, under I-10, and state lease land extends north of I-10 bordering the Cienega Creek Natural Preserve. Portions of the Bar V Ranch are managed by Pima County as part of their CLS. While the study area for the Project includes a small portion of the Cienega Creek Natural Preserve and Bar V Ranch property, the Project footprint is outside of these planning areas.

D. Pinal County Comprehensive Plan

The 2009 Pinal County Comprehensive Plan, as amended through 2015, guides and manages the County's future growth, quality of life, and sustainability. The 2015 amended plan is the current guiding Plan. Policy 7.6.1.6 and Goal 7.7 of the plan directly address transmission of electricity: "Support the transmission of renewable energy from sources within and outside of Pinal County," and "support the provision of adequate energy for the future while protecting the natural environment and resources" (Pinal County 2015). The Pinal County Zoning Ordinance provides rules, regulations, and plans by which the future growth and development in the county may be directed in accordance with the Pinal County Comprehensive Plan and ordinance, as provided in the County Planning and Zoning Act of 1949. Section 2.150.010 states that transmission lines for the distribution of electricity and power substations shall be permitted in any zoning district and not be subject to the minimum lot area requirement (Pinal County 2015).

In the CEC Upgrade study area, the Tortolita interconnection and Tortolita Substation expansion occur within the Pinal County Comprehensive Plan planning area. The study area includes portions of the Red Rock growth area. The Red Rock growth area is a mixed use residential and employment area that will link Southern Pinal County and Northern Pima County (Pima County 2015). Pinal County Comprehensive Plan Land Use Categories present within the study area include Airport Reserve, Employment, General Public Facilities/Services, High Intensity Activity Center, Moderate Low Density Residential, Very Low Density Residential, and Open Space. The Tortolita interconnection intersects with the Employment and General Public Facilities/Services categories; the Tortolita Substation occurs within the Employment category (*see* Exhibit A-4).

The Employment category is defined as areas that can support a variety of employment-generating business activities such as industrial, office, business park, and warehousing and distribution. Power plants are also included in this category.

The General Public Facilities/Services category is defined as areas that include large public facilities that require significant space such as landfills, wastewater facilities, water campuses, and concentrations of public buildings.

Southline will work with Pinal County during the permitting phase of the Project to ensure compliance with applicable plans and zoning requirements of the Pinal County Comprehensive Plan.

E. City of Willcox General Plan

The General Plan for the City of Willcox, as updated through 2009, includes the following elements: citizen participation, land use, transportation/circulation, housing, growth, cost of development, environmental planning, open space, and water resources. The overriding goal of the General Plan is to protect and preserve the city's heritage and to ensure compatible and managed growth for its citizens (City of Willcox 2009). The plan does not include management prescriptions for transmission line construction. No proposed Project activities conflict with other goals and objectives of the Plan. Study area lands are zoned R-1: Residential single family; however, none of the CEC Project footprint crosses into the city's planning area (*see* Exhibit A-4).

F. City of Tucson General Plan

Plan Tucson, the City of Tucson's General Plan, developed in December 2013, presents a series of policies and recommendations for Tucson and, in some cases, all of eastern Pima County. It is in effect only within the corporate limits of the city of Tucson. The policies establish a basic direction and approach to guide the future growth and development of Tucson. The plan does not include management prescriptions for transmission line construction. No proposed Project activities conflict with other goals and objectives of the plan.

The policies also provide guidance for the preparation of more detailed environmental, land use, and transportation proposals; the refinement of community facility and service plans; and the development or amendment of subregional, area, neighborhood, and other specific plans. The City of Tucson Land Use Code was published on July 1, 1995 to protect and promote the general health, safety, and welfare of all present and

future residents of Tucson. More specifically, the Land Use Code implements the City's General Plan. It guides new growth and redevelopment in accordance with the policies of the City of Tucson Land Use Code, encourages the most efficient use of land through site-sensitive design. It also reduces potential hazards to individuals and neighborhoods resulting from incompatible land uses or from the development of environmentally hazardous or sensitive lands; protects and enhances the city's natural, cultural, historical, and scenic resources; and promotes the economic stability of the community (City of Tucson 1995, 2001). The City of Tucson is currently updating its General Plan. Southline will work with the City of Tucson during the permitting phase of the Project to ensure compliance with applicable plans and zoning requirements of the City of Tucson General Plan.

Within the CEC Upgrade study area, the Vail interconnection and the Vail and DeMoss Petrie Substation expansion areas occur within the city limits of Tucson on state and private land. The Vail interconnection and the Vail Substation expansion area lands are zoned RH: Rural Homestead. Lands within the study area are primarily zoned RX-1: Residence Zone. Additional zoning includes R-1: Residence Zone, C-2: Commercial Zone, I-1: Light Industrial, and I-2: Heavy Industrial. The DeMoss Petrie Substation expansion area land is zoned I-2: Heavy Industrial.

II. STATE GOVERNMENT PLANS

A. Arizona State Land Department

ASLD-owned lands are not public lands, but are instead the subject of a public Trust created to support the education of Arizona children. The Trust accomplishes this mission in a number of ways, including through its sale and lease of Trust lands for grazing, agriculture, municipal, school site, residential, commercial, and open space purposes. The ASLD lands included in the study area are nearly all managed for recreation, grazing, rangeland management, and commercial and open space purposes. To cross ASLD lands, Southline must acquire a ROW. ROWs are granted across ASLD lands for a variety of uses, such as access roads, infrastructure, and power lines.

B. Arizona State Land Department Conceptual Land Use Plans

ARS § 37-331.03 directs the ASLD to create conceptual land use plans for urban state trust lands as appropriate. These plans are to identify appropriate land uses, transportation corridors, and infrastructure requirements, and natural and artificial constraints and opportunities associated with the land. Two ASLD conceptual land use

plans will be adjacent to the proposed Project: Rincon Posta Quemada (ASLD 2007), and Houghton Road Corridor Conceptual Plans (ASLD 2004).

III. FEDERAL GOVERNMENT PLANS

The CEC Proposed Route study area includes lands managed by the Bureau of Land Management (“BLM”), Department of Defense (“DOD”), and Bureau of Reclamation (“BR”) (see Table H-1 and Exhibit A-2, Land Ownership and Jurisdiction). The analysis in this exhibit focuses on state, local, and private existing uses and land use plans; however, an extensive discussion of the federal land use regulations, policies, and plans in the study area can be found in Exhibit B-1, Final EIS Section 3.11.

IV. PRIVATE ENTITY PLANS

No private entity plans were identified on private lands in the CEC Proposed Route and CEC Substation study area. Although the CEC Upgrade Route and CEC Substation expansions at Vail and DeMoss Petrie are located within the city limits of Tucson, they are located in non-residential areas. No new planned residential subdivisions are identified in the study area.

V. FARM AND RANGELANDS PLANS

Farm and rangeland plans are implemented at the federal and state levels. Relevant management plans were reviewed to identify potential conflicts between the existing resource management objectives and the CEC Proposed Route. A summary of federal farm and rangeland laws, programs, and policies is located in Exhibit B-1, Final EIS Section 3.11.

The ASLD administers grazing on state lands. The ASLD issues grazing leases to ranchers following protocol issued in the “Arizona Standards for Rangeland Health and Guidelines for Grazing Administration” (University of Arizona 2012). The intent is to provide standards to ensure healthy rangelands, with management coordinated between the state and federal agencies.

VI. MILITARY

The CEC Proposed Route is located on, or in the vicinity of DOD Lands, Military Training Routes (“MTR”), and Military Operations Areas (“MOA”). Federal policies

relating to the CEC Proposed Route and military land uses are summarized in Exhibit B-1, Final EIS Section 3.11.

Arizona Senate Bill 1387 was signed into law in 2007 by Governor Jan Brewer, which requires that Fort Huachuca be notified and consulted with for projects with potential impacts to the Fort or the Buffalo Solider Electronic Testing Range (“BSETR”). Senate Bill 1387 was enacted to protect the unique electromagnetic conditions of the BSETR. The BSETR is not within the study area of the CEC Proposed Route and CEC Substations.

EXISTING LAND USE

The following land use discussion is described in general characterization of land use areas, using the available data as described by the National Land Cover Database categories (DOI, USGS 2015). Existing land uses in the study area are summarized in Table H-3 below and mapped in Exhibit A-2. Existing farm and rangeland uses are described further below, and in Exhibit B-1, Final EIS Section 3.11. Existing military uses are also described further below, and in Exhibit B-1, Final EIS Section 3.11. Detailed discussions of minerals and mining uses are discussed in Exhibit B-1, Final EIS Section 3.4. Detailed discussions of the special land use designations (federal, state, county, city, and tribal), are discussed in Exhibit B-1, Final EIS Section 3.12. Recreational uses are discussed in Exhibit F and Exhibit B-1, Final EIS Section 3.14.

Table H-3. Existing Land Uses in the Study Area.

Land Use	Acreage
Barren Land (Rock/Sand/Clay)	11,898
Cultivated Crops	14,133
Deciduous Forest	4
Developed, High Intensity	930
Developed, Low Intensity	4,305
Developed, Medium Intensity	2,858
Developed, Open Space	5,617
Emergent Herbaceous Wetlands	15
Evergreen Forest	259
Grassland/Herbaceous	13,409
Mixed Forest	8
Open Water	274
Pasture/Hay	583
Shrub/Scrub	157,203

The CEC New Build study area is located in open range-type land uses, crossing mountain ranges and valley/basins. In the CEC Upgrade study area, the distance between the valley/basins and mountain ranges becomes less, and urban populations surround the Tucson metropolitan area. Much of the land in the study area is managed by federal agencies, which generally provide for multiple use management or preservation of natural resources. Major portions of the CEC Proposed Route parallel existing linear facilities in disturbed corridors, including transmission and distribution lines, and roads ROWs. Some of the lands are also used for livestock grazing. The primary transportation facilities in the CEC Proposed Route and CEC Substation study area are Interstate 10, U.S. Route 191, and State Route 77.

The CEC New Build Route and Apache CEC Substation expansion study area is primarily undeveloped land with pockets of heavy to moderate land uses surrounding the municipal areas and industrial use. The study area can be characterized as open desert with some agriculture and widely dispersed, low-density residential uses on private parcels. In Cochise County, some of the agricultural land is used for viticulture. Although the CEC New Build Route will be new construction, the majority of the route would parallel existing ROWs and disturbance.

The CEC Upgrade Route and CEC Upgrade Substation expansions (Pantano, Vail, DeMoss Petrie, and Tortolita) mainly traverse areas of desert landscape, rural-residential, and commercial development. The Project also crosses urban and suburban areas, including the Tucson metropolitan area. The study area includes primarily undeveloped land with pockets of heavy to moderate land uses surrounding the municipal areas and industrial use. The undeveloped, more rural area of this study area can be characterized as open desert with some agriculture and widely dispersed, low-density residential uses on private parcels. The more developed urban and suburban areas in the CEC Upgrade study area include the city of Tucson and the areas surrounding the community of Vail. Residents in these areas currently experience the land uses associated with the existing transmission lines or substations.

I. FARM AND RANGELANDS

Despite the arid climate, farmlands do exist in the CEC New Build study area, aided by irrigation where more permanent water sources are present from groundwater pumping. The CEC Proposed Route study area contains cultivated crops, pasture/hay

fields, and grassland/herbaceous rangelands used for grazing (*see* Table H-3). Southeast of the Willcox Playa, traditional agricultural land use has shifted to include small vineyards (domestic farm wineries) since the mid-1980s. Since around 2005 there has been an increase in this shift in land use. Almost all of the land in the study area is designated as grazing land, with the exception of active farmland and other urban and developed areas. The CEC Upgrade study area generally consists of urban and suburban areas, including the city of Tucson, with minimal farmland. Most of the farmlands are playas that would require seasonal flooding to be agriculturally productive. The majority of the rangeland within the CEC Upgrade study area consists of grazing lands managed by the State of Arizona on ASLD lands.

II. MILITARY

The military study area for the CEC Proposed Route includes any MOAs, MTRs, and military installation that may intersect with the Project footprint. This study area is used to identify military resources that could be directly, indirectly, or cumulatively impacted by surface disturbance, above-surface facilities (*i.e.*, structures, spans) and where construction materials, equipment, and workers may be present. The following is a summary of existing military resources in the study area. Detailed descriptions of military operations and federal plans pertaining to military operations are contained in Exhibit B-1, Final EIS Section 3.11.

A. CEC New Build Route

A small portion of the CEC New Build Route (0.5 acres of segment P7) crosses lands owned by the DOD in Willcox Playa. The Willcox Playa was formerly used as a bombing range around World War II, but is no longer used as an active bombing range. The Willcox Playa is under a perpetual lease to the Fort Huachuca's Electronic Proving Ground ("EPG") operations by DOD and is currently used for aerial training by the EPG. The Playa falls outside the BSETR, but is still a key location for Fort Huachuca's overall electronic testing mission in Arizona.

There are multiple MTRs within the CEC New Build study area. Transmission line structures built along training routes will need to be limited in height to less than 200 feet, and consultation with military authorities is advised. Building to the floor of the airspace will require separate operational clearance requirements for safety because the MTR above ground level minimum applies to not just the terrain, but also human-made obstructions.

Tucson International Airport is home to the U.S. Air Force 162nd Fighter Wing (“FW”), which trains pilots in the F-16 Falcon fighter aircraft. Specific military airspace operations categories that intersect the CEC Proposed Route study area include Low Altitude Step Down Training, Low-Altitude Navigation, Low-Altitude Tactical Formation, and Low-Altitude Awareness Training.

B. CEC Upgrade Route

No DOD lands are crossed by the CEC Upgrade study area. Several military installations, MTAs, and MOAs are located in the vicinity of the CEC Upgrade Route; however, they are outside of the study area.

The 162nd Wing of the Arizona Air National Guard is located at the Tucson International Airport in Tucson. The 162nd Wing has scheduling responsibility and operational control of the Special Use Airspace for seven MOAs, three low-level MTRs and one Air-to-Air Refueling Anchor. The 162nd Wing also regularly uses the Goldwater Range Complex and the Sells MOA.

The Arizona Army National Guard, Silver Bell Army Heliport, is located about 30 miles northwest of Tucson in Marana, Arizona, in the Pinal Airpark Area. The Army National Guard trains helicopter pilots near the Tortolita Substation. Military training flights occur between 1,000 and 10,999 feet above mean sea level. The CEC Upgrade Tortolita interconnection (segment U3l) will introduce changes to the existing airspace obstructions on approach and departure of the Silver Bell Army Heliport; see discussion below and in Exhibit B-1, Final EIS. Pinal Airpark is also the home to DOD Parachute Training and Testing Facility at the West Drop Zone of Pinal Airpark. The CEC Upgrade Route segment U3l might conflict with their training and testing. Pinal Airpark is currently updating the Master Airport Plan.

III. PROPOSED LAND USES AND DEVELOPMENTS

For those municipalities that do have relevant land use management plans (*i.e.*, Willcox and Tucson), a review of local plans did not identify any anticipated activities within the study area that would substantially or substantively differ from current land uses (*see* Exhibit A-4, Future Land Use). Therefore, planned land uses are assumed to be the same as existing land uses.

Future development on privately owned lands under county or municipality planning jurisdiction will require approval by the respective jurisdiction’s planning and

development departments. Development of subdivisions and master planned communities in the Tucson metropolitan area or elsewhere will require extensive planning and coordination with the county and city Development Services Departments (*e.g.*, subdivision plat approval, substantive review by applicable departments of all onsite and offsite infrastructure needs). Final subdivision plats are approved by the municipal City Council or County Board of Supervisors after a public hearing.

Development on state lands will occur through a lease or sale of state Trust properties by ASLD. During the micro-siting of the CEC Proposed Route every effort will be made to avoid creation of remnant parcels and work with ASLD to consider future development opportunities.

For the CEC Proposed Route, ROWs for the transmission line facilities on private lands will be obtained as easements. Land for CEC Substation expansions will be obtained in fee simple where located on private land. A good-faith effort will be made to purchase the land and/or obtain easements on private lands through reasonable negotiations with the landowners. The landowners will be compensated based on market value for the land that may be acquired for the Project.

POTENTIAL EFFECTS

The impact intensity of the CEC Proposed Route and CEC Substations on land use, including farm and range resources and military operations will be minor. All negotiations with landowners (including state, county, and private) will be conducted in good faith, and the Project's effect on the parcel or other landowner concerns will be addressed.

I. LAND USE

The primary land use change associated with the CEC Proposed Route and CEC Substations is the development of currently natural or undeveloped land for a new and/or upgraded transmission line and ancillary facilities (*e.g.*, substations, access roads). The total ROW and substation expansion acreage in the CEC New Build Section is approximately 1,653 acres; the total ROW and substation expansion acreage in the CEC Upgrade Section is approximately 137 acres, comprised of federal, state, and private land. No change in federal, state, or local municipality land ownership will result.

In general, land use impacts will be minimized where linear utilities will be constructed parallel to established or designated corridors and substation expansion will be located adjacent to existing substations. For all segments, impacts to land uses will occur in some form along any portions of the route that cross undeveloped lands, irrigated agricultural lands, residential subdivisions, and areas used for industrial or military testing and training. Proponent Committed Environmental Measures (“PCEMs”) will be effective in avoiding or minimizing direct impacts with land uses in most conditions. There will be no direct displacement of existing land use authorizations or ROWs, residential, business, or industrial structures.

All state lands will be used by the CEC Proposed Route and CEC Substations in accordance with ASLD ROW granting procedures. Since the CEC Upgrade Route uses existing access roads, the impacts to land management by the state will be minor and localized impacts. Most uses of state lands (*e.g.*, dispersed recreation) will still be allowed within the ROW. Refer to Exhibit F for further discussion of potential effects to recreation resources.

CEC Substations will be upgrades to existing facilities with existing zoning regulations and subsequent compliance already in place; therefore, the CEC Substations will not require any rezoning or land reclassification. The CEC New Build and Upgrade Routes will be constructed in new ROWs; however, will not require any rezoning or land reclassification or plan amendments. No new access roads will be developed in the residential areas of Tucson, Willcox, or other municipalities that occur within the study area. Southline will coordinate with local municipalities to obtain applicable land use permits or permit updates where applicable.

Private land owners may experience minor, temporary nuisance impacts in residential areas where the temporary activities involved with construction (*i.e.*, noise, dust, and heavy equipment) will typically be incompatible with local zoning restrictions. Where private lands will be intersected, easements will be negotiated with the landowner. The temporary impacts will be short-term and will cease once construction activities are completed at a particular segment.

Potential effects on future or planned land use are generally associated with Project construction rather than operation because once the ROW grant has been made and construction is completed, no further changes to future or planned land use patterns are expected.

II. FARM AND RANGELANDS

Construction of the CEC Proposed Route and CEC Substation expansions will have minor direct effects on farmlands and rangeland by removing land acreage from productivity. Except under extraordinary circumstances, all operation and maintenance activities will occur within the transmission line and access road ROWs. These activities will not directly or indirectly impact adjacent farmlands or rangelands. No direct effect will occur on farmlands and rangelands during the operations and maintenance phase of the Project beyond the long-term loss of lands resulting from Project construction. The CEC Proposed Route and CEC Substations will not significantly reduce farmlands or rangelands in the study area because farming and ranching operations are still allowable uses within the transmission line ROW. While permanent disturbance will result in a conversion of farmland to non-farmable land, temporary disturbance along the Project ROW will be returned to farmland. Much of the CEC Proposed Route parallels existing linear facilities, which have already resulted in a conversion of land to non-farmable land.

III. MILITARY

Impacts to military operations could occur from construction, operations, and maintenance of the CEC Proposed Route and CEC Substations where the transmission line, substations, and ancillary facilities intersect with military facilities. This could include MTRs or areas where training is for electronics and communications. Ground disturbance-based impacts on military uses will not be significant, as all operations/training occurring in visual routes is aerial in nature. These impacts will be below the above-ground-level thresholds since the areas that may intersect military training visual routes include existing transmission line facilities that are already below above-ground-level thresholds, and the military operations have operated in conjunction with these facilities previously.

Additionally, in accordance with PCEMs noted in Exhibit B-1, Final EIS Table 2-8, the Project will include the optional structure heights in areas intersecting some MTRs. Towers crossing the MTRs will also have anti-collision lighting to the maximum extent possible in order to make the hazard of transmission lines more apparent to pilots flying low altitude at night. These measures will mitigate impacts to military training and airspace usage, as well as contribute to the safe conduct of missions.

REFERENCES

- Arizona State Land Department (ASLD). 2004. Houghton Road Corridor Conceptual Plan. Available at:
<http://www.houghtonroad.com/images/UpdatedProjectFactSheet.pdf>.
Accessed September 2016.
- — — . 2007. Rincon Valley / Posta Quemada Conceptual Plan. Available at:
http://www.tucsonaz.gov/files/ocsd/CMS1_035705.pdf. Accessed September 2016.
- City of Tucson. 2013. Plan Tucson: City of Tucson General and Sustainability Plan 2013. Available at: https://www.tucsonaz.gov/files/integrated-planning/Plan_Tucson_Complete_Doc_11-13-13.pdf. Accessed September . City of Tucson Land Use Code. Combined Ordinances.
- City of Willcox. 2009. City of Willcox General Plan Update. Adopted March 2009.
- Cochise County. 2015a. Cochise County Comprehensive Plan, as Amended and Readopted. Available at:
https://www.cochise.az.gov/sites/default/files/planning_and_zoning/Cochise%20County%20Comprehensive%20Plan%202015%20FINAL.pdf. Accessed September 2016.
- — — . 2015b. Cochise County Comprehensive Plan GIS data. Available at:
<https://www.cochise.az.gov/GIS/Planning/ComprehensivePlan.html>.
Accessed September 2016.
- McGann and Associates. 1994. Cienega Creek Natural Preserve Management Plan. Prepared for the Pima County Regional Flood Control District. Available at:
<http://rfcd.pima.gov/wrd/landmgt/cienegapreserve/>. Accessed September 2016.
- Pima County. 2009 (amended through 2015). Pima Prospers: Pima County Comprehensive Plan Initiative. Available at:
<http://webcms.pima.gov/cms/One.aspx?portalId=169&pageId=35831>.
Accessed September 2016.
- — — . 2004. Bar V Ranch Acquisition: 2004 Conservation Bond Program. Available at:
<http://www.pima.gov/cmo/sdcp/reports/d29/BarVReport.pdf>. Accessed February 13, 2015

— — —. 2012. Sonoran Desert Conservation Plan Supplement. Available at:
<http://www.pima.gov/CMO/SDCP/>. Accessed July 2013.

Pinal County. 2015. Pinal County Comprehensive Plan, as amended. Available at:
<http://pinalcountyaz.gov/CommunityDevelopment/Planning/Documents/00%20Comprehensive%20Plan%202015.pdf>. Accessed September 2016.

— — —. 2011. Pinal County Zoning Ordinance. Combined Ordinances, October 2011.

U.S. Department of Interior and Geological Survey. 2015. National Land Cover Database. Available at: <http://www.mrlc.gov/>. Accessed September 2016.

University of Arizona. 2012. Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. Available at:
<http://rangelandswest.arid.arizona.edu/rangelandswest/jsp/hottopics/legal/policy/azstandards/azstandardscontents.jsp>. Accessed March 2012.