

1 Matthew Derstine (Bar No. 011448)
 2 SNELL & WILMER L.L.P.
 3 One East Washington Street
 4 Suite 2700
 5 Phoenix, Arizona 85004
 6 Tel: (602) 382-6342
 7 E-Mail: mderstine@swlaw.com

8 Maribeth Klein (Bar No. 023943)
 9 Alysha Y. Gilbert (Bar No. 035639)
 10 SALT RIVER PROJECT AGRICULTURAL
 11 IMPROVEMENT & POWER DISTRICT
 12 P. O. Box 52025, PAB381
 13 Phoenix, AZ 85072-2025
 14 Tel: 602.236.2824
 15 E-Mail: Maribeth.Klein@srpnet.com
 16 Alysha.Gilbert@srpnet.com

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

17 KEVIN THOMPSON, Chairman
 18 NICK MYERS, Vice Chair
 19 LEA MARQUEZ PETERSON
 20 RACHEL WALDEN
 21 RENÉ LOPEZ

22 IN THE MATTER OF THE APPLICATION
 23 OF SALT RIVER PROJECT
 24 AGRICULTURAL IMPROVEMENT AND
 25 POWER DISTRICT, IN CONFORMANCE
 WITH THE REQUIREMENTS OF
 ARIZONA REVISED STATUTES,
 SECTIONS 40-360, *et seq.*, FOR A
 CERTIFICATE OF ENVIRONMENTAL
 COMPATIBILITY FOR THE ARIZONA
 STATION PROJECT: THREE 350MW
 UNITS AT THE PROPOSED ARIZONA
 STATION SITE (aka CORONADO
 GENERATING STATION); PROPOSED
 500KV TRANSMISSION LINE BETWEEN
 (PROPOSED) ARIZONA STATION SITE,
 AND (EXISTING) KYRENE RECEIVING
 STATION, THROUGH THE (PROPOSED)
 DINOSAUR RECEIVING STATION;

Case No. 16

Docket No. L-00000B-75-0000-00016

**APPLICATION TO AMEND
 DECISION PURSUANT TO A.R.S. §
 40-252 TO APPROVE CGS
 REPOWER PROJECT**

1 PROPOSED 500KV TRANSMISSION
2 LINES BETWEEN (PROPOSED) ARIZONA
3 STATION SITE AND THE (EXISTING)
4 CHOLLA POWER PLANT, OR THE
5 (EXISTING) SAN JUAN-VAIL
6 TRANSMISSION LINE; PROPOSED 230KV
7 TRANSMISSION LINE BETWEEN
8 (PROPOSED) DINOSAUR RECEIVING
9 STATION AND (EXISTING) SANTAN
10 RECEIVING STATION.

6 Salt River Project Agricultural Improvement and Power District (SRP) submits this
7 Application pursuant to A.R.S. § 40-252 to amend the Arizona Corporation Commission's
8 (Commission) decision approving the Certificate of Environmental Compatibility (CEC)
9 for the Coronado Generating Station (CGS) to authorize the conversion of CGS to natural
10 gas-fired generation (CGS Repower Project).

11 This Application is supported by the declarations of (i) Bill McClellan, Director of
12 Resource Planning and Development for SRP attached as Exhibit 1 (McClellan Decl.); (ii)
13 Hank Hamblin, Director of CGS attached as Exhibit 2 (Hamblin Decl.); (iii) Zachary
14 Harbin, Manager of SRP's Air Quality Services together with the Air Quality Modeling
15 Report as Exhibit 3 (Harbin Decl.); (iv) Hayden Fennell, Senior Project Origination
16 Consultant and Project Manager for the CGS Repower Project together with the System
17 Impact Study attached as Exhibit 4 (Fennell Decl.); and (v) Teresa O'Neil of Kimley-Horn
18 together with the Environmental Narrative Report prepared by Kimley Horn, attached as
19 Exhibit 5 (O'Neil Decl.).

20 I. INTRODUCTION

21 In 1975, the Commission approved the CEC granted by the Arizona Power Plant
22 and Transmission Line Siting Committee for the construction and operation of CGS in
23 Case No. 16 (CEC 16). CEC 16 authorized construction of three 350 megawatt (MW) coal-
24 fired electric generating units at CGS. SRP completed construction of two of the three units
25 authorized under CEC 16 and has operated CGS since 1979.

1 For nearly 45 years, SRP has relied upon CGS as a key resource in providing
2 affordable and reliable power to its customers. In June 2025, SRP announced its plan to
3 convert CGS to natural gas with the transition expected to be completed in 2029. The
4 decision to convert CGS to natural gas pursues the lowest-cost option to preserve the
5 plant's capacity – enough power to serve more than 150,000 homes – that will be critical
6 to meet the peak energy demand of the Valley, which is expected to increase by 50 percent
7 by 2035. The conversion of CGS also allows SRP to retain a core workforce at the plant
8 which, in turn, supports the economy and residents of St. Johns.

9 As described below and in the supporting declarations and reports attached to this
10 Application, the CGS Repower Project is in the public interest and should be approved
11 under A.R.S. § 40-252.

12 **II. LOCATION AND OPERATION OF CGS**

13 CGS is a coal-fired steam plant located near St. Johns, Apache County, Arizona that
14 is 100 percent owned and operated by SRP. The CGS main plant site is located on 640
15 acres. The CGS main plant site is located in open desert with the nearest residence located
16 1.3 miles north of CGS. The town of St. Johns, the nearest incorporated residential
17 community, is located approximately 6 miles southwest of the CGS main plant site.

18 Since its construction, CGS has provided reliable baseload capacity to the SRP
19 electric grid. CGS's output currently represents approximately 10 percent of SRP's peak
20 demand, and CGS provides vital baseload capacity to maintain reliability for SRP
21 customers, especially during the summer months, when electricity demand is the highest.
22 Upon completion of the CGS Repower Project, CGS will continue to provide a reliability
23 backbone for SRP's resource portfolio, providing a firm resource. SRP will not be
24 modifying the nameplate capacity of the existing units but expects the net capacity of the
25 plant to increase from 762 MW to potentially 812 MW as a result of efficiencies gained

1 from the conversion as well as turbine upgrades that SRP may perform in parallel with the
2 CGS Repower Project. [McClellan Decl. at ¶¶3, 6]

3 **III. DECISION TO CONVERT CGS TO NATURAL GAS**

4 SRP is focused on ensuring a secure energy future in Arizona for generations to
5 come while maintaining reliability, affordability, and sustainability. Coal-fired operations
6 at CGS are scheduled to end in 2032. [McClellan Decl. at ¶4] In this context, SRP and its
7 Board of Directors (Board) considered alternative resource options at CGS to provide
8 capacity into the 2040s when nuclear or other technologies still in development may
9 become available. Alternatives considered before approving the CGS Repower Project
10 included: (1) conversion of CGS to natural gas; (2) construction of a new gas facility, or
11 (3) replacement of CGS with long-duration lithium-ion batteries. Ultimately, SRP's Board
12 determined that converting CGS to natural gas was the best option because it would provide
13 a firm resource to support SRP's reliability goals at the lowest cost, preserving capital and
14 supporting affordability while providing a bridge to the mid-2040s when other generating
15 technologies in development may be available for implementation. [McClellan Decl. at ¶5]

16 **IV. BENEFITS OF CONVERSION**

17 The CGS Repower Project provides a number of benefits. Converting CGS to
18 natural gas allows SRP to continue to use significant portions of the plant's existing
19 equipment, including steam turbines, boilers, and the plant's existing transmission
20 infrastructure. While there will be some staffing adjustments, the CGS Repower Project
21 also allows SRP to maintain much of the existing workforce. Further, the conversion to
22 natural gas will reduce plant auxiliary power consumption by eliminating coal handling
23 and coal conditioning equipment. Although the majority of the coal ash produced from the
24 coal combustion process currently is put to beneficial use by a third-party, the conversion
25

1 to natural gas will also reduce the amount of coal ash disposed in the ash landfill by
2 approximately 16,000 tons per year. [Hamblin Decl. at ¶9]

3 In accordance with A.R.S. § 48-242, SRP will continue to support the community
4 through voluntary contributions in lieu of property taxes that are expected to provide \$9
5 million annually to Apache County and St. Johns. [Fennell Decl. at ¶8]

6 The CGS Repower Project also preserves valuable transmission capacity. SRP
7 conducted a System Impact Study which confirms that conversion of CGS from coal-fired
8 generation to natural-gas fired generation will have no negative power flow or stability
9 impacts on the electric system.

10 **V. CHANGES NEEDED FOR CONVERSION**

11 The fuel conversion from coal to natural gas at CGS involves two primary changes
12 at the plant: (1) construction of a natural gas supply and delivery system; and (2)
13 replacement of the existing burners within the boilers.

14 *a. Natural Gas Supply*

15 SRP is currently in discussions with natural gas companies regarding delivery of
16 natural gas to the CGS main plant site. The natural gas company will be responsible for the
17 siting and construction of the natural gas pipeline and associated facilities needed to bring
18 natural gas to CGS and is subject to the jurisdiction of the Federal Energy Regulatory
19 Commission (FERC) and the Department of Transportation. Although the natural gas
20 supply yard will be constructed, owned and operated by the natural gas company, SRP
21 expects that the supply yard will be installed within the fence line of the main CGS plant
22 site. [Hamblin Decl. at ¶5]

23 From the supply yard, a pipeline will be used to transfer natural gas to an interior
24 gas yard for conditioning. After conditioning, the gas will then be piped to the boiler
25

1 buildings using pipe racks. Installation of the natural gas facilities within the CGS main
2 plant site is anticipated to take 6 to 8 months. [Hamblin Decl. at ¶6]

3 *b. Boiler Conversion*

4 Conversion of the existing coal-fired burners requires replacement of the burners
5 within the boilers. Each boiler is expected to have approximately 24 natural gas burners.
6 The burners consist of a gas feed line attached to a nozzle (a/k/a “gas gun”) with an ignition
7 source. The burners are roughly 6 feet in length and 6 inches in diameter. The work to
8 replace the burners will take place inside the boiler building. SRP also plans to convert the
9 auxiliary boiler located within the boiler building. The auxiliary boiler currently relies on
10 low-sulfur diesel fuel but will be modified to run primarily on natural gas, while retaining
11 the ability to use low-sulfur diesel fuel if needed. SRP estimates that it will take
12 approximately 8 weeks to convert each boiler. [Hamblin Decl. at ¶7]

13 **VI. CONVERSION MATERIALLY REDUCES EMISSIONS**

14 The CGS Repower Project significantly reduces overall emissions from the plant
15 and does not have an adverse impact on air quality. Nitrogen oxides (NO_x), sulfur dioxide
16 (SO₂) and particulate matter less than 10 microns in aerodynamic diameter (PM₁₀)
17 emissions are expected to be dramatically reduced as a direct result of the change in fuel
18 source. In addition, carbon dioxide emissions (CO₂) are expected to be reduced by
19 approximately 45 percent by the fuel conversion. [Harbin Decl. at ¶8]

20 Air quality modeling also confirms that operation of CGS as a natural-gas-fired
21 generating plant will not cause or contribute to an exceedance of any National Ambient Air
22 Quality Standard (NAAQS) for carbon monoxide (CO), nitrogen dioxide (NO₂), SO₂,
23 PM₁₀, and particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}).
24 [Harbin Decl. at ¶4]

1 **VII. CONVERSION HAS LIMITED ENVIRONMENTAL IMPACTS**

2 The CGS Repower Project also has little or no impact on existing land use, water
3 use, visual appearance, biological resources, noise, and cultural resources.

4 *a. Impact on Land Use*

5 The CGS Repower Project will take place within the existing main plant site at CGS,
6 a heavily disturbed industrial area. A majority of the land surrounding the CGS main plant
7 site is undeveloped. The section directly north of the CGS main plant site, with an existing
8 railway line, is United States land managed by the Bureau of Land Management, and the
9 section directly west of the CGS main plant site is Arizona State Trust Land. The remainder
10 of the land directly around the CGS main plant site is owned by SRP. The nearest residence
11 is located approximately 1.3 miles north of the CGS main plant site. Thus, the CGS
12 Repower Project does not adversely impact surrounding land use. [O’Neil Decl. at ¶14]

13 *b. No Impact on Water Use*

14 The conversion to natural gas is not expected to have a material impact on water use
15 at the plant. CGS is expected to use a similar amount of water per megawatt of power
16 generated because the same basic process is used to generate steam to produce electricity.
17 Further, some water savings are expected due to the elimination of coal ash handling,
18 hauling, and dust suppression associated with the coal pile and coal conditioning.
19 Accordingly, the CGS Repower Project does not adversely impact water usage. [Hamblin
20 Decl. at ¶7]

21 *c. No Visual Impacts*

22 There will be no adverse visual impact from the conversion given that the existing
23 boilers and exhaust stacks will remain in use while no significant visible infrastructure will
24 be constructed. The structures expected to be added to the CGS main plant site, as a result
25 of the CGS Repower Project, will be compatible with the form, line, surface colors, and

1 textures of existing structures and are much smaller in scale relative to existing objects in
2 view. Therefore, the addition of these structures is not anticipated to result in visual
3 contrast. [O’Neil Decl. at ¶¶15-19]

4 *d. No Biological Impacts*

5 The CGS Repower Project will occur on pre-disturbed lands of the CGS main plant
6 site. While the potential exists for the undeveloped portions of the CGS main plant site to
7 be used by birds, bats, and insects, these undeveloped portions of the CGS main plant site
8 exhibit relatively low value habitat for most wildlife and provide minimal habitat for
9 special status species. Even if some of this degraded habitat is removed for the CGS
10 Repower Project, undisturbed habitats are available in the open desert areas surrounding
11 the CGS main plant site that provide more suitable habitats for these species to utilize.
12 Thus, because of the industrialized use of the area and low-value habitat, the CGS Repower
13 Project is not expected to adversely impact biological resources. [O’Neil Decl. at ¶¶25-29]

14 *e. No Noise Impacts*

15 Conversion of the boilers to burn natural gas is not anticipated to increase the noise
16 associated with fuel combustion. The major components that generate noise related to fuel
17 combustion and steam generation are currently in service and will be unchanged by the
18 fuel conversion. These components include the large fans providing air to the combustion
19 system and the pump motors conveying water through the system to produce steam, not
20 the burners themselves. These components will remain in use following the conversion to
21 natural gas. [Hamblin Decl. at ¶11]

22 *f. No Cultural Resource Impacts*

23 Prior to the construction of the existing CGS main plant site, the area was surveyed
24 for cultural resources resulting in the excavation of two cultural sites. Even though the CGS
25 main plant site is an existing industrial area with heavy use, SRP undertook a new Class

1 III cultural survey of the CGS main plant site not currently covered by pavement, buildings
2 and other structures. No new cultural resources were found. [O’Neil Decl. at ¶¶20-24]

3 In sum, the conversion to natural gas will not have any material adverse
4 environmental impacts.

5 **VIII. MINOR CEC AMENDMENTS REQUIRED FOR CONVERSION**

6 Under A.R.S. § 40-252, the Commission has authority to “rescind, alter or amend
7 any order or decision made by it” based on the public interest.

8 Here, SRP is requesting amendment of CEC 16 to authorize the fuel conversion
9 from coal to natural gas. The requested amendment recognizes that coal-fired operations
10 at CGS will need to continue until the conversion to natural gas is complete.

11 SRP is not requesting additional amendments to CEC 16, and no other changes are
12 warranted. In accordance with CEC 16 Condition 1, SRP filed an approved water
13 management plan with the Arizona Water Commission (now the Arizona Department of
14 Water Resources), and the CGS Repower Project is not expected to have any material
15 impact on water use at the plant. Since CEC 16 was approved in 1975, CGS has become
16 subject to numerous federal and state environmental regulations governing its operations
17 previously addressing CEC 16 Conditions 2 and 3. SRP holds a Class I Air Quality Permit
18 (Permit No. 89460) for the continued operation of CGS. The facility is classified as a major
19 source pursuant to Arizona Administrative Code (A.A.C.) R18-2-101.75 because its
20 potential to emit (PTE) is greater than major source thresholds for the following pollutants:
21 particulate matter with an aerodynamic diameter less than 10 micrometers (μm) (PM₁₀),
22 particulate matter with an aerodynamic diameter less than 2.5 μm (PM_{2.5}), NO_x, carbon
23 monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOCs), combined
24 hazardous air pollutants (HAPs), and the individual HAPs of lead (Pb), hydrochloric acid
25 (HCl), and hydrofluoric acid (HF). The CGS Repower Project will require revision of the

1 Class I Air Quality Permit to accommodate provisions relevant to burning natural gas as
2 fuel.

3 Visibility impacts associated with CGS (CEC 16 Condition #2) are regulated under
4 the federal Clean Air Act's regional haze program. Under the regional haze program, states
5 are required to develop and implement air quality protection plans to reduce the pollution
6 that causes visibility impairment. SRP's regional haze obligations associated with CGS are
7 incorporated into Attachment E of Class I Air Quality Permit, and SRP has met the
8 requirements in Attachment E.

9 In compliance with A.R.S. Title 49, Chapter 2, Articles 1, 2 and 3, and A.A.C. Title
10 18, Chapter 9, Articles 1 and 2, A. A. C. Title 18, Chapter 11, Article 4, SRP holds an
11 Aquifer Protection Permit (Permit No. P-101449) for discharging facilities at CGS,
12 including wastewater areas and coal ash disposal areas. (See CEC 16, Condition #3.)
13 Management of coal combustion residuals is also regulated as nonhazardous waste under
14 the federal Resource Conservation and Recovery Act (RCRA). These regulatory programs
15 will remain applicable following the CGS Repower Project and eliminate the need for any
16 new or amended conditions.

17 **IX. EVIDENTIARY HEARING IS NOT REQUIRED**

18 Under A.R.S. § 40-252, the Commission is authorized to alter or amend a CEC
19 without an evidentiary hearing, and there is a long line of cases in which the Commission
20 has approved amendments without a hearing.

21 For example, In Decision No. 77761 (October 2, 2020), the Commission approved
22 the construction of a new substation, two 0.15-mile segments of double-circuit 230kV
23 transmission lines, and two new monopole structures, all without an evidentiary hearing.
24 The project at issue in Decision No. 77761 was in a developing area of incorporated
25 Goodyear with a residential housing development within one half mile. In contrast, the

1 CGS Repower Project changes in this case will occur in a disturbed industrial area. In
2 addition, the CGS Repower Project changes are being made to existing infrastructure or
3 involve the addition of facilities compatible with the existing structures such that there is
4 no material visual impact.

5 Another example of the Commission amending a CEC without a hearing is found
6 in Decision No. 76795 (August 15, 2018). In that case, the Commission modified, without
7 evidentiary hearing, a CEC to authorize double-circuit structures for a one-mile portion of
8 a previously approved single-circuit transmission line. Like the amendment approved in
9 Decision No. 77761, that transmission line at issue in Decision No. 76795 was located in
10 a developed residential area that is a stark contrast to the location of the CGS Repower
11 Project changes presented here.

12 And in Decision No. 74206 (December 3, 2013), the Commission modified, without
13 evidentiary hearing, an existing CEC to relocate 1,500 feet of the approved corridor and
14 allow a different type of structure than was approved in the original CEC.

15 Without taking the time to cite all the cases that involve the approval of a CEC
16 amendment without an evidentiary hearing, it is apparent that the Commission has
17 approved CEC modifications without an evidentiary hearing in a variety of circumstances
18 when the record establishes that the requested change has minimal environmental impacts.

19 While SRP recognizes that there are occasions where an evidentiary hearing may
20 be necessary for the Commission to fully consider and evaluate a proposed amendment,
21 one is not necessary here. SRP engaged in a robust public outreach process to ensure that
22 local jurisdictions, relevant agencies, and community residents were provided with project
23 information and the opportunity to relay information or potential concerns. SRP instituted
24 multiple public participation activities, including multiple public meetings, project mailers,
25 a telephone line, an email contact, newspaper and social media advertisements, a dedicated

1 website and agency briefings. [Fennell Decl. at ¶¶10-15] The community most impacted
2 by the conversion strongly supports the CGS Repower Project. [Fennell Decl. at ¶¶13]
3 Additionally, the undisputed emission benefits resulting from conversion combined with
4 no adverse environmental impacts supports granting this Application without the need for
5 an evidentiary hearing.

6 **X. CONCLUSION**

7 It is well-known by the Commission, the need for SRP – and all similarly situated
8 utilities – to maintain operation of reliable generation assets and to employ innovative ways
9 to support and strengthen energy resources in the State. The modifications internal to the
10 Coronado Generating Station to accommodate a change in fuel source and boiler
11 capabilities proposed herein are essential to SRP’s continued operation of CGS and the
12 success of SRP’s resource plan, are environmentally compatible and in the public interest.

13 Based on the foregoing facts, SRP respectfully requests the Commission amend
14 CEC 16 to approve the CGS Repower Project as discussed in this Application.

15 RESPECTFULLY SUBMITTED this 12th day of January 2026.

16 SNELL & WILMER L.L.P.

17 By /s/ Matthew Derstine

18 Matthew Derstine (Bar No. 011448)
19 One East Washington Street, Suite 2700
20 Phoenix, Arizona 85004

21 and

22 Maribeth Klein (Bar No. 023943)
23 Alysha Y. Gilbert (Bar No. 035639)
24 SALT RIVER PROJECT AGRICULTURAL
25 IMPROVEMENT & POWER DISTRICT
P. O. Box 52025, PAB381
Phoenix, AZ 85072-2025

1 **Copy** e-filed this 12th day of January 2026,
with:

2 <https://efiling.azcc.gov>

3 Arizona Corporation Commission
4 1200 West Washington Street
5 Phoenix, AZ 85007

6 Copies emailed this 12th day of January
2026:

7 Arizona Corporation Commission
8 Office of General Counsel
9 Utilities Division
10 1200 West Washington Street
Phoenix, AZ 85007

11 Copy of the foregoing mailed this 12th
12 day of January, 2026 to:

13 City of Tempe
14 c/o City Manager
15 31 East 5th Street
Tempe, AZ 85281

16 Sierra Club
17 514 West Roosevelt Street
18 Phoenix, AZ 85003

19 By: /s/ Michele Maser

EXHIBIT "1"

1 5. In this context, SRP and its Board of Directors (Board) considered alternative
2 resource options to provide capacity at CGS into the 2040s when nuclear or other
3 technologies still in development may become available. Alternatives considered included:
4 (1) conversion of CGS to natural gas; (2) construction of a new natural gas facility, or (3)
5 replacement of CGS with long-duration lithium-ion batteries. Ultimately, SRP's Board
6 determined that converting CGS to natural gas (the CGS Repower Project) was the best
7 option because it would provide a firm resource to support SRP's reliability goals at the
8 lowest cost, preserving capital and supporting affordability while providing a bridge to the
9 mid-2040s when other generating technologies in development may be available for
10 implementation.

11 6. Upon completion of the CGS Repower Project, CGS will continue to provide
12 a reliability backbone for SRP's resource portfolio providing a firm resource that provides
13 capacity during system peaks and when reliability is critical. Although the nameplate
14 capacity of each unit will remain the same, SRP expects the net capacity of the plant to
15 increase from 762 MW to potentially 812 MW as a result of efficiencies gained from the
16 conversion as well as turbine upgrades that SRP may perform in parallel with the CGS
17 Repower Project.

18 **Total CGS Repower Project Cost**

19 7. The cost of the CGS Repower Project is \$1.1 billion through 2045. This cost
20 includes the direct costs to convert and operate CGS. In comparison, replacing CGS with
21 a new natural gas facility would cost \$300 million more than the CGS Repower Project
22 over the same period. Replacement of CGS with Long-duration lithium-ion batteries would
23 cost approximately \$1.2 billion more than the CGS Repower Project and would not provide
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the firm capacity available in all hours of the day offered by the natural gas alternatives.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 01/12/2026

William J. McClellan

William J. McClellan
Director, Resource Planning, Acquisition &
Development
Salt River Project Agricultural Improvement
and Power District

EXHIBIT "2"

1 4. Attached as Exhibit 1 to this Declaration, is a diagram of the main plant site
2 identifying the major operational areas of the site.

3 **The Conversion to Natural Gas Primarily Requires a Natural Gas Supply and**
4 **Replacement of the Boiler Burners**

5 5. A new natural gas fuel supply system is required for the CGS Repower
6 Project which requires a natural gas lateral to the plant site, a supply yard, and a gas
7 delivery system to transport gas from the supply yard to the boilers. The lateral and natural
8 gas supply yard will be constructed by the natural gas company. The supply yard is
9 expected to be installed within the fenceline of the main plant site.

10 6. Natural gas from the supply yard will be delivered to an interior gas yard
11 through a new natural gas pipeline. The interior gas yard will consist of natural gas
12 conditioning equipment. After conditioning, the gas will be piped to the boiler buildings
13 via underground and above ground piping systems. Installation of the pipeline and interior
14 gas yard will require excavators, earthmovers and cranes and is anticipated to take six to
15 eight months. The majority of this work can be completed without an outage and is
16 expected to take place before SRP begins converting the coal-fired burners.

17 7. Conversion of the existing coal-fired burners to burn natural gas requires
18 replacement of the burners. The existing coal-fired burners will be modified and retrofitted
19 for gas firing. Each unit is expected to have approximately twenty-four (24) natural gas
20 burners. The burners consist of a gas feed line attached to a nozzle (a/k/a “gas gun”) with
21 an ignition source.¹ The burners are roughly six (6) feet in length and six (6) inches in
22 diameter. The work to replace the burners will take place inside the boiler building. SRP
23 also plans to convert the auxiliary boiler located within the boiler building. The auxiliary
24

25 ¹ The existing oil igniters and all equipment associated with the oil igniters will be removed and replaced with a direct-spark ignition system within the gas gun.

1 boiler currently relies on low-sulfur diesel fuel but will be modified to run primarily on
2 natural gas, while retaining the ability to use low-sulfur diesel fuel if needed.

3 8. To complete the conversion, SRP plans to temporarily shut down one unit
4 beginning in the 3rd quarter of 2029 to replace the coal-fired burners with natural gas-fired
5 burners. SRP would continue to burn coal on the other unit until the fuel is diminished or
6 removed from premises. Then, SRP would temporarily shut down the second unit in the
7 4th quarter of 2029 to change out the burners. Both units are planned to be fully offline for
8 approximately 8 weeks and are anticipated to be commercially operational, fueled by
9 natural gas, in December 2029.

10 9. Equipment associated with coal-fired operations that is no longer needed
11 following the conversion to gas will be removed as necessary or abandoned in place.

12 10. The conversion to natural gas will reduce plant auxiliary power consumption
13 by eliminating coal handling and coal conditioning equipment. Although the majority of
14 the coal ash produced from the coal combustion process currently is put to beneficial use
15 by a third-party, the conversion to natural gas will also reduce the amount of coal ash
16 disposed in the ash landfill by approximately 16,000 tons per year.

17 **No Noise Impacts Are Expected from the Conversion**

18 11. Conversion of the boilers to burn natural gas is not anticipated to increase the
19 noise associated with fuel combustion. The major components that generate noise related
20 to fuel combustion and steam generation are currently in service and will be unchanged by
21 the fuel conversion. These components include the large fans providing air to the
22 combustion system and the pump motors conveying water through the system to produce
23 steam, not the burners themselves. These components will remain in use following the
24 conversion to natural gas.

1 12. At the same time, the transition from coal to natural gas is expected to reduce
2 noise from other coal plant systems due to the retirement of coal conditioning and handling
3 equipment such as ball mills, crushers, conveyors, and heavy equipment associated with
4 coal-moving operations.

5 **Water Usage is Expected to Remain the Same or Decrease Following the Conversion**

6 13. Conversion of CGS to natural gas is expected to use a similar amount of
7 water per megawatt because the same basic process is used to generate steam to produce
8 electricity. Some water savings are expected as a result of eliminating the need for dust
9 suppression associated with the coal pile and coal conditioning.

10 I declare under penalty of perjury that the foregoing is true and correct to the best
11 of my knowledge and belief.

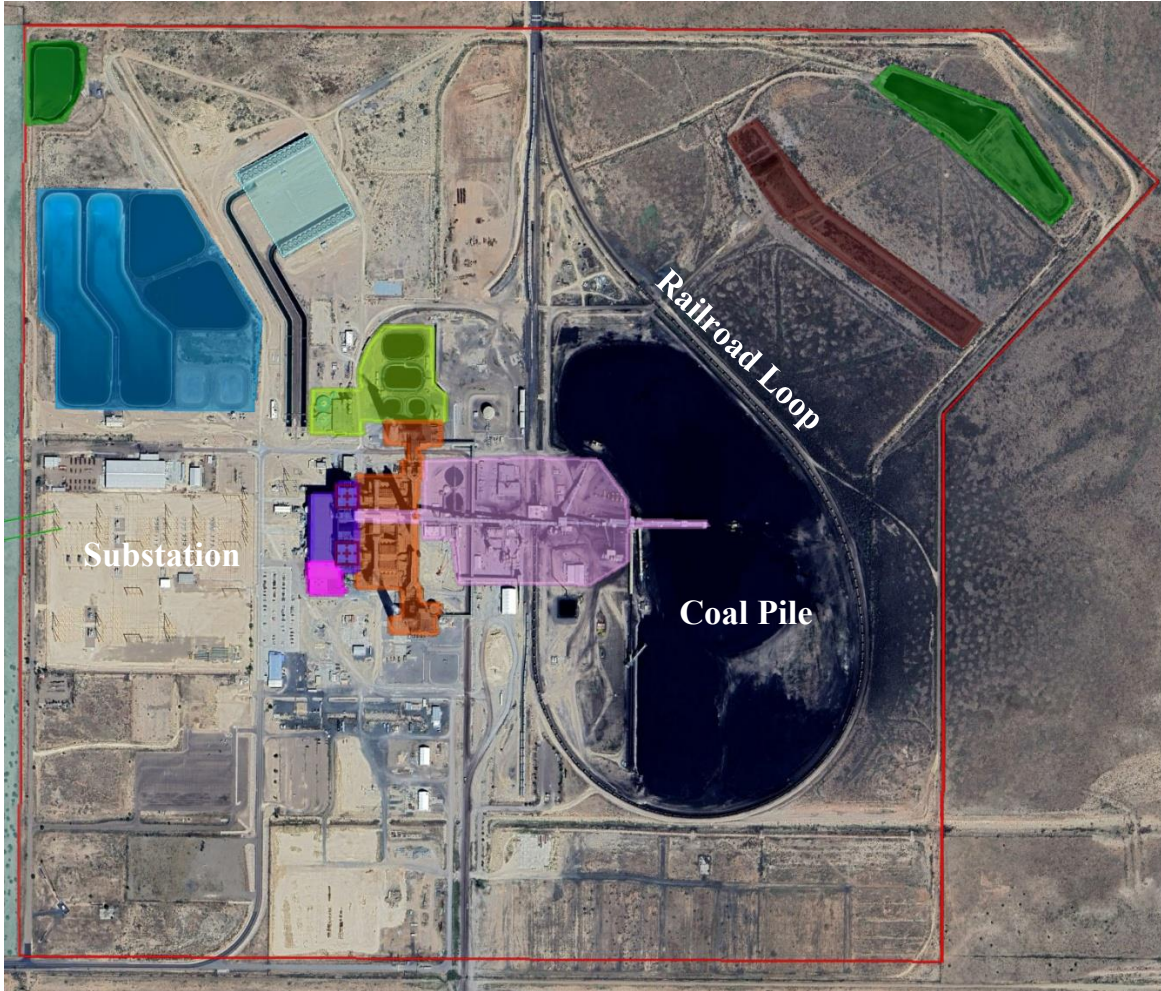
12
13 Dated: 01/12/2026



Hank Hamblin
Director of Coronado Generating Station
Salt River Project Agricultural
Improvement and Power District

EXHIBIT A

EXHIBIT A



Legend

- Water Reservoir
- Cooling Towers
- Stormwater Retention Pond
- Water Treatment
- Sewage Treatment
- Coal Handling Operations
- Emissions Controls
- Power Block
- Boilers
- Administration Building

EXHIBIT "3"

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DECLARATION OF ZACHARY HARBIN
ON BEHALF OF SALT RIVER PROJECT AGRICULTURAL
IMPROVEMENT AND POWER DISTRICT

I, Zachary (Zach) Harbin, state as follows:

1. I am over the age of 18, competent to make this declaration, and unless otherwise indicated, all of the facts set forth in the declaration are based on my personal knowledge.

2. I am employed at Salt River Project Agricultural Improvement and Power District (SRP) as the Manager of SRP's Air Quality Services. I have a Bachelor of Science in Civil Engineering from Arizona State University. I have worked in air quality permitting and compliance for over nineteen (19) years. I worked for an environmental consulting firm for nine (9) years and at SRP for the past ten (10) years.

3. I am responsible for managing the analysis to determine the expected impacts on air quality following the conversion of the Coronado Generating Station (CGS). As part of this effort, SRP engaged RTP Environmental Associates, Inc. (RTP) to conduct an ambient air quality assessment. This assessment characterizes the potential effects of the conversion on ambient concentrations of carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter less than 10 microns in aerodynamic diameter (PM₁₀), and particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}). The results of this analysis are included in Exhibit A, the Air Quality Modeling Report.

4. The modeling results indicate that the conversion of CGS from a coal-fired generating station to a natural gas-fired generating station (the CGS Repower Project) will not cause or contribute to an exceedance of any National Ambient Air Quality Standard (NAAQS) for the pollutants modeled. The assessment was conducted in two phases: a

1 significant impact analysis and a refined phase that included a NAAQS analysis specific to
2 NO₂.

3 5. The significant impact analysis assesses whether the CGS Repower Project
4 will have a significant or meaningful impact on air quality based on a quantitative threshold
5 (referred to as the significant impact levels (SILs) or “significance levels”) established by
6 the U.S. Environmental Protection Agency and adopted by the Arizona Department of
7 Environmental Quality (ADEQ) in Arizona Administrative Code (A.A.C.) R18-2-401(27).
8 For the significant impact analysis, only the changes due to the CGS Repower Project were
9 modeled (i.e the boiler conversions). The analysis did not take into account emissions
10 reductions associated with elimination of the coal-handling and conveyance systems. The
11 maximum modeled pollutant concentrations associated with conversion of the boilers were
12 compared to the SILs in A.A.C. R18-2-401(27). With the exception of NO₂, the maximum
13 modeled concentrations for all pollutants and averaging periods were below the SILs.

14 6. For NO₂, RTP conducted a refined analysis to assess whether under a worst-
15 case (full load – maximum continuous rated load) operating scenario, the emissions from
16 the converted boilers would cause an exceedance of the NAAQS. To do this analysis, RTP
17 undertook a cumulative analysis considering all NO₂ emission sources at CGS as well as
18 nearby NO₂ emission sources. The model ran by RTP evaluated NO₂ concentrations at each
19 location in the model (receptors) where the modeled concentration was above the
20 applicable SILs. The maximum modeled annual NO₂ concentration was 9 percent of the
21 NAAQS and the maximum modeled 1-hour NO₂ concentration was 88 percent of the
22 NAAQS. Thus, the modeling results show that the Project will not cause or contribute to
23 an exceedance of the NO₂ NAAQS.

24 7. RTP and SRP also performed a preliminary emissions analysis (actual-to-
25 projected-actual (ATPA)) for the CGS Repower Project using three capacity factors 55,

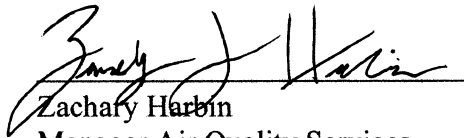
1 33.7, and 15 percent for the electric generating units and a 50 percent capacity factor for
2 the auxiliary boiler. The 55 percent capacity factor represents the maximum utilization of
3 the units without triggering a major modification for air permitting purposes, while 33.7
4 percent and 15 percent reflect two operating scenarios for the electric generating units. SRP
5 anticipates that a 15 percent capacity factor is representative of the most likely operating
6 scenario for the electric generating units. Using historical annualized emissions from April
7 2021 through March 2023, SRP estimated (projected) the emissions from the CGS boilers
8 following conversion at each capacity factor. The analysis indicates that at a 15 percent
9 capacity factor (the most representative scenario), emissions drop significantly. Volatile
10 organic compounds (VOCs) could be reduced by as much as 53 percent, and SO₂ by up to
11 97 percent compared to current coal operations. At a 33.7 percent capacity factor, annual
12 emissions of criteria pollutants (CO, NO₂, SO₂, PM₁₀, and PM_{2.5}) and carbon dioxide (CO₂)
13 will decrease and no increase in VOC emissions is expected. At 55 percent, VOC emissions
14 may increase by approximately 39 tons per year, however, in comparison, emissions of
15 criteria pollutants (CO, NO₂, SO₂, PM₁₀, and PM_{2.5}) are expected to decrease by hundreds
16 to thousands of tons per year and CO₂ emissions are expected to decrease by over one
17 million short tons per year.

18 8. Overall, the CGS Repower Project does not adversely impact air quality. The
19 conversion of CGS from coal-fired to natural gas-fired generation will not cause or
20 contribute to a violation of a NAAQS, and the conversion to natural gas significantly
21 reduces overall air emissions from the plant. In particular, nitrogen oxides, SO₂, and PM₁₀
22 emissions will reduce dramatically as a direct result of the change in fuel source. In
23 addition, CO₂ emissions are expected to decrease by at least 45 percent.

1 9. SRP plans to submit a Significant Permit Revision application for the CGS
2 Title V operating permit to ADEQ in 2026. The process for revising the Title V permit will
3 include a public process pursuant to A.A.C. R18-2-320.

4 I declare under penalty of perjury that the foregoing is true and correct to the best
5 of my knowledge and belief.

6 Dated: 01/12/2026



Zachary Harbin
Manager Air Quality Services
Salt River Project Agricultural Improvement and
Power District

EXHIBIT A

**AIR DISPERSION MODELING REPORT
FOR THE CGS REPOWER PROJECT
AT THE SALT RIVER PROJECT
CORONADO GENERATING STATION
Facility ID: 4477**



Delivering water and power®

**Prepared for:
Salt River Project
P.O. Box 52025, M/S: PAB359
Phoenix, Arizona 85072-2025**

**Prepared by:
RTP Environmental Associates, Inc.
304A West Millbrook Road
Raleigh, North Carolina 27609**

January 2026



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1.0 INTRODUCTION

This document presents the methodology and results of the air quality dispersion modeling analysis conducted for a project at the Coronado Generating Station (“CGS”) owned and operated by Salt River Project Agricultural Improvement and Power District (“SRP”) in Apache County, Arizona. As discussed in greater detail in Section 2 herein, the Project involves converting the primary fuel source for CGS from coal to natural gas (the “CGS Repower Project” or “Project”).

While analysis of the CGS Repower Project’s emissions is not required under the Prevention of Significant Deterioration (“PSD”) or minor New Source Review (“NSR”) regulations, SRP has elected to perform dispersion modeling as part of their application to amend CGS’s Certificate of Environmental Compatibility (“CEC”). The analysis was conducted to characterize, for each pollutant for which there is a National Ambient Air Quality Standard (“NAAQS”), the effects on ambient air quality that will result from the Project.

The modeling analysis conforms with the modeling procedures outlined in the U.S. Environmental Protection Agency’s (“USEPA”) Guideline on Air Quality Models¹ (“Guideline” or “Appendix W”), the Arizona Department of Environmental Quality (“ADEQ”) Air Quality Modeling Guidelines for Arizona Air Quality Permits², and associated modeling policy and guidance.

2.0 PROJECT DESCRIPTION

SRP owns and operates CGS, located near St. Johns, Apache County, Arizona. CGS operates pursuant to ADEQ Title V Permit No. 89460.

CGS currently consists of two coal-fired electric utility steam generating units (Units 1 and 2) and ancillary equipment. The Project involves making physical changes to the Unit 1 and Unit 2 boilers and to non-emitting equipment at the facility in order to convert these two units into natural gas-fired units. The annual capacity factor limit on the auxiliary boiler also will be increased to 50 percent from 10 percent and it will be changed to accommodate natural gas as fuel in addition to the current fuel oil capability. Much of the ancillary equipment at the facility, including coal handling and ash handling equipment associated with coal firing, will no longer be used.

The modeling analysis allows for a comparison of the maximum pollutant concentrations in ambient air due to emissions from Units 1 and 2 while burning natural gas (i.e., the post-Project scenario) to the maximum pollutant concentrations in ambient air due to emissions from Units 1 and 2 while burning coal (i.e., the pre-Project scenario). Emissions from ancillary equipment other than the auxiliary boiler were omitted from the significant impact modeling analysis. This omission is conservative, as it understates the emissions reductions and associated air quality benefits resulting from the Project.

3.0 SITE DESCRIPTION

CGS consists of two electric utility steam generating units and ancillary equipment. The facility is located approximately seven miles northeast of the City of St. Johns, in Apache County, Arizona (Township 14 North, Range 29 East). The approximate Universal Transverse Mercator ("UTM") coordinates of the facility are 658,400 meters east and 3,827,700 meters north (UTM Zone 12, North American Datum 83 ("NAD83")). The facility is approximately 1,779 meters (5,800 feet) above mean sea level. Figure 1 shows the general location of the facility. Figure 2 shows the specific location of the facility on a U.S. Geological Survey ("USGS") topographic map.

Apache County is classified as attainment or unclassified for all criteria pollutants as codified at 40 CFR 81.303.

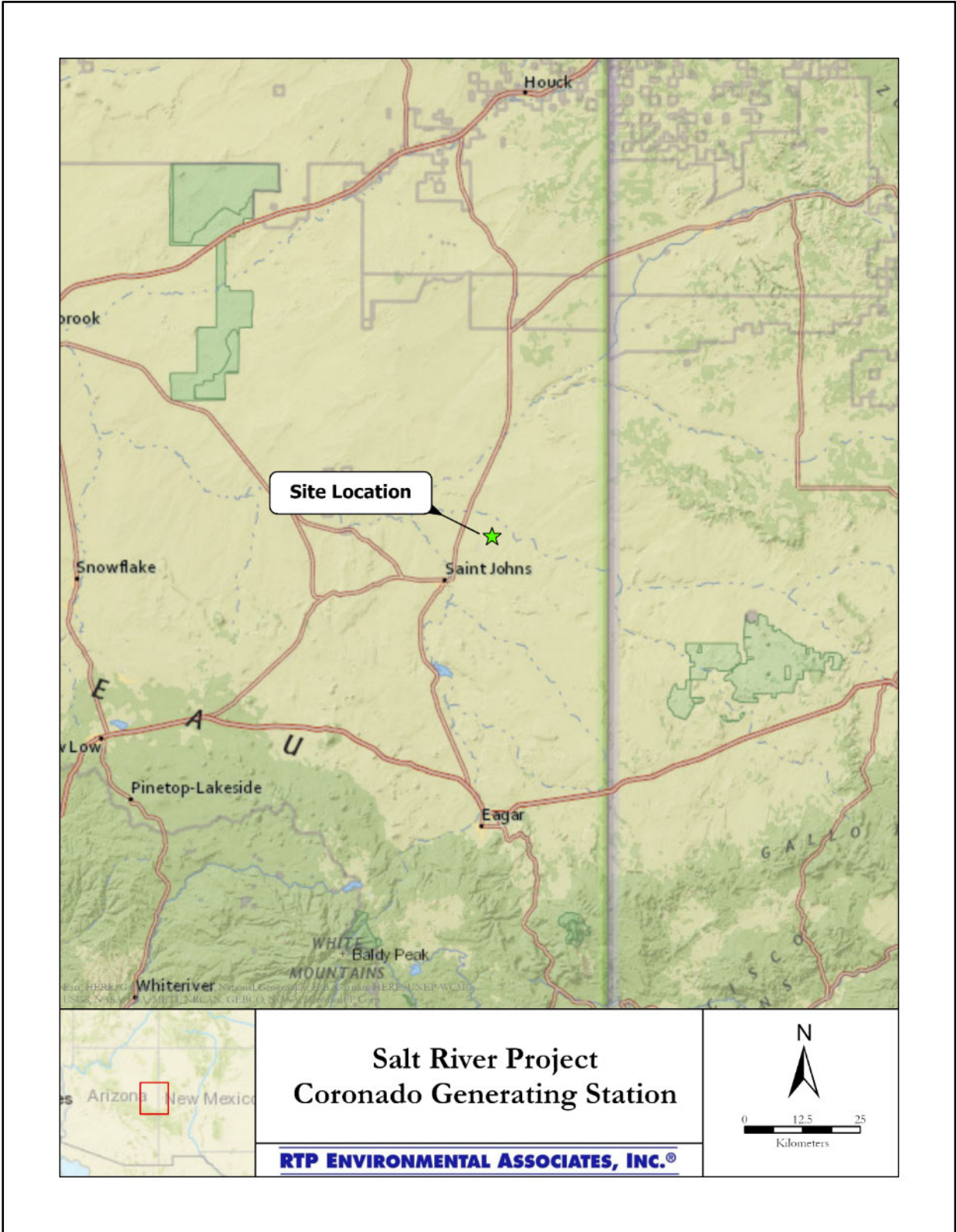


Figure 1. General Location of CGS

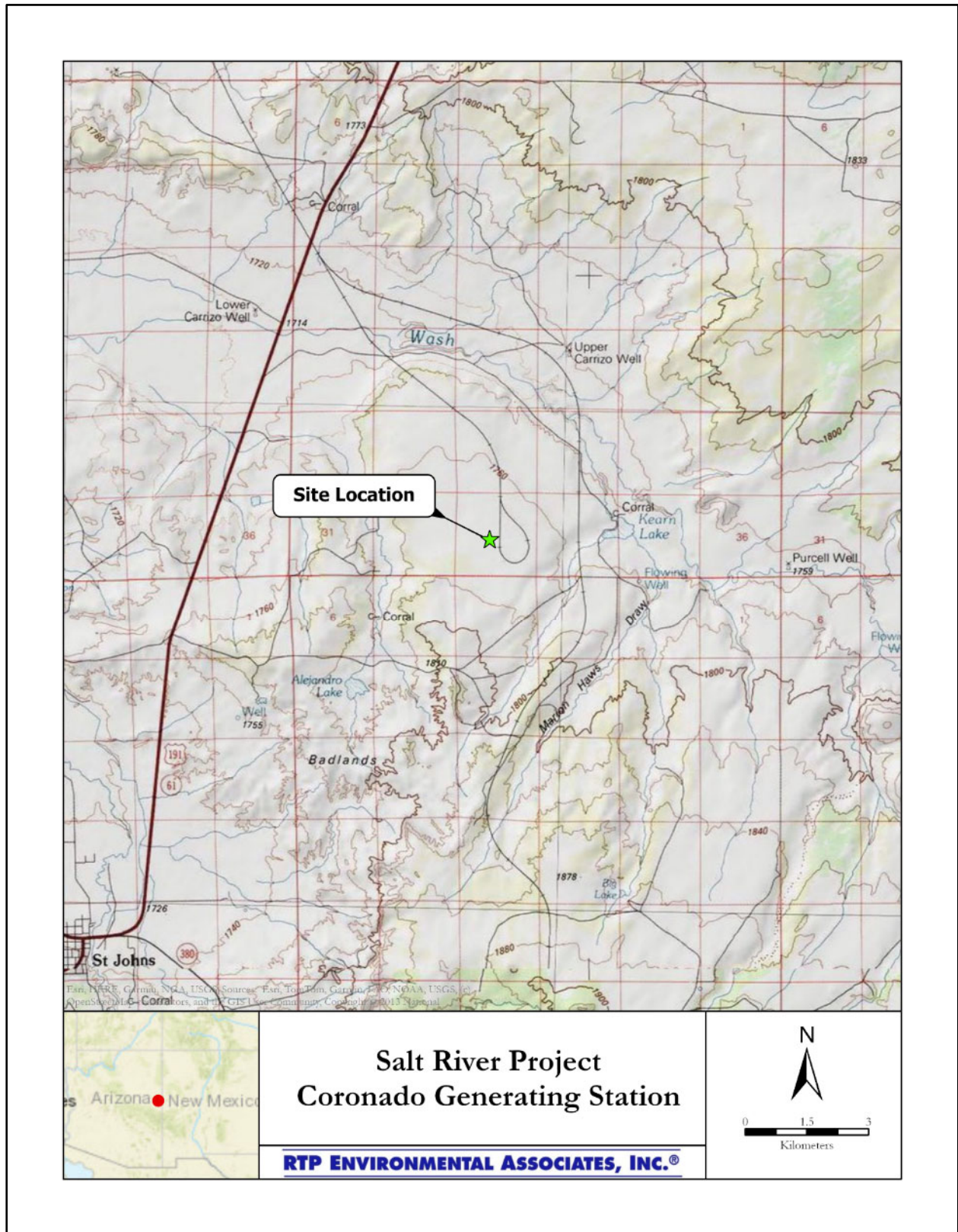


Figure 2. Specific Location of CGS

4.0 MODEL SELECTION AND MODEL INPUT

4.1 Model Selection

The latest version of the AMS/EPA Regulatory Model (AERMOD, Version 24142) was used for conducting the dispersion modeling analysis. AERMOD is a Gaussian plume dispersion model that is based on planetary boundary layer principles for characterizing atmospheric stability. The model evaluates the non-Gaussian vertical behavior of plumes during convective conditions with the probability density function and the superposition of several Gaussian plumes. AERMOD is a modeling system with three components: AERMAP is the terrain preprocessor program, AERMET is the meteorological data preprocessor, and AERMOD includes the dispersion modeling algorithms.

AERMOD is the required model for calculating ambient concentrations near the CGS facility based on the model's ability to incorporate multiple sources and source types. The model can also account for convective updrafts and downdrafts and meteorological data throughout the plume depth. The model also provides parameters required for use with up-to-date planetary boundary layer parameterization. The model has the ability to incorporate building wake effects and to calculate concentrations within the cavity recirculation zone. All model options were selected as recommended in the USEPA Guideline on Air Quality Models.

Providence Oris's BEEST Graphical User Interface ("GUI") was used to run AERMOD. The GUI uses an unaltered version of the AERMOD code. Therefore, a model equivalency evaluation pursuant to Section 3.2 of 40 CFR 51, Appendix W was not warranted.

4.2 Model Control Options and Land Use

AERMOD was run in the regulatory default mode with the default rural dispersion coefficients. This is supported by the Land Use Procedure consistent with subsection

7.2.1.1(b) of the Guideline and Section 5.1 of the AERMOD Implementation Guide. The USGS 2024 National Land Cover Data (“NLCD”) within 3km of the site were converted to Auer 1978 land use types and evaluated (Figure 3 and Table 1). It was determined that the land use in the vicinity of the site is comprised predominantly of shrub/scrub; with 2% defined as urban (NLCD categories 23 and 24). The area surrounding the facility was therefore determined to be rural as defined by Auer (i.e., less than 50% of the area is classified as urban).

Table 1. Land-Use Classification

2019 NLCD Classification		Area (Acres)	Percentage of Total Area	Auer Land-Use Classification		Rural or Urban
11	Open Water	25	0.4%	A5	Water surfaces	Rural
12	Perennial Ice/Snow	0.0	0.0%	A5	Water surfaces	Rural
21	Developed, Open Space	78	1.1%	A1	Metropolitan Natural	Rural
22	Developed, Low Intensity	266	3.8%	R1	Common Residential	Rural
23	Developed, Medium Intensity	106	1.5%	I1, I2, C1, R2, R3	Industrial/Commercial/Compact Residential	Urban
24	Developed, High Intensity	21	0.3%	I1, I2, C1, R2, R3	Industrial/Commercial/Compact Residential	Urban
31	Barren Land	13	0.2%	A3	Undeveloped (Grasses/Shrub)	Rural
41	Deciduous Forest	0	0.0%	A4	Undeveloped (Wooded)	Rural
42	Evergreen Forest	0	0.0%	A4	Undeveloped (Wooded)	Rural
43	Mixed Forest	0	0.0%	A4	Undeveloped (Wooded)	Rural
52	Shrub/Scrub	6,466	92.6%	A3	Undeveloped (Grasses/Shrub)	Rural
71	Grassland/Herbaceous	7	0.1%	A3	Undeveloped (Grasses/Shrub)	Rural
81	Pasture/Hay	0	0.0%	A2	Agricultural	Rural
82	Cultivated Crops	0	0.0%	A2	Agricultural	Rural
90	Woody Wetlands	0	0.0%	A4	Undeveloped (Wooded)	Rural
95	Emergent Herbaceous Wetlands	0	0.0%	A3	Undeveloped (Grasses/Shrub)	Rural

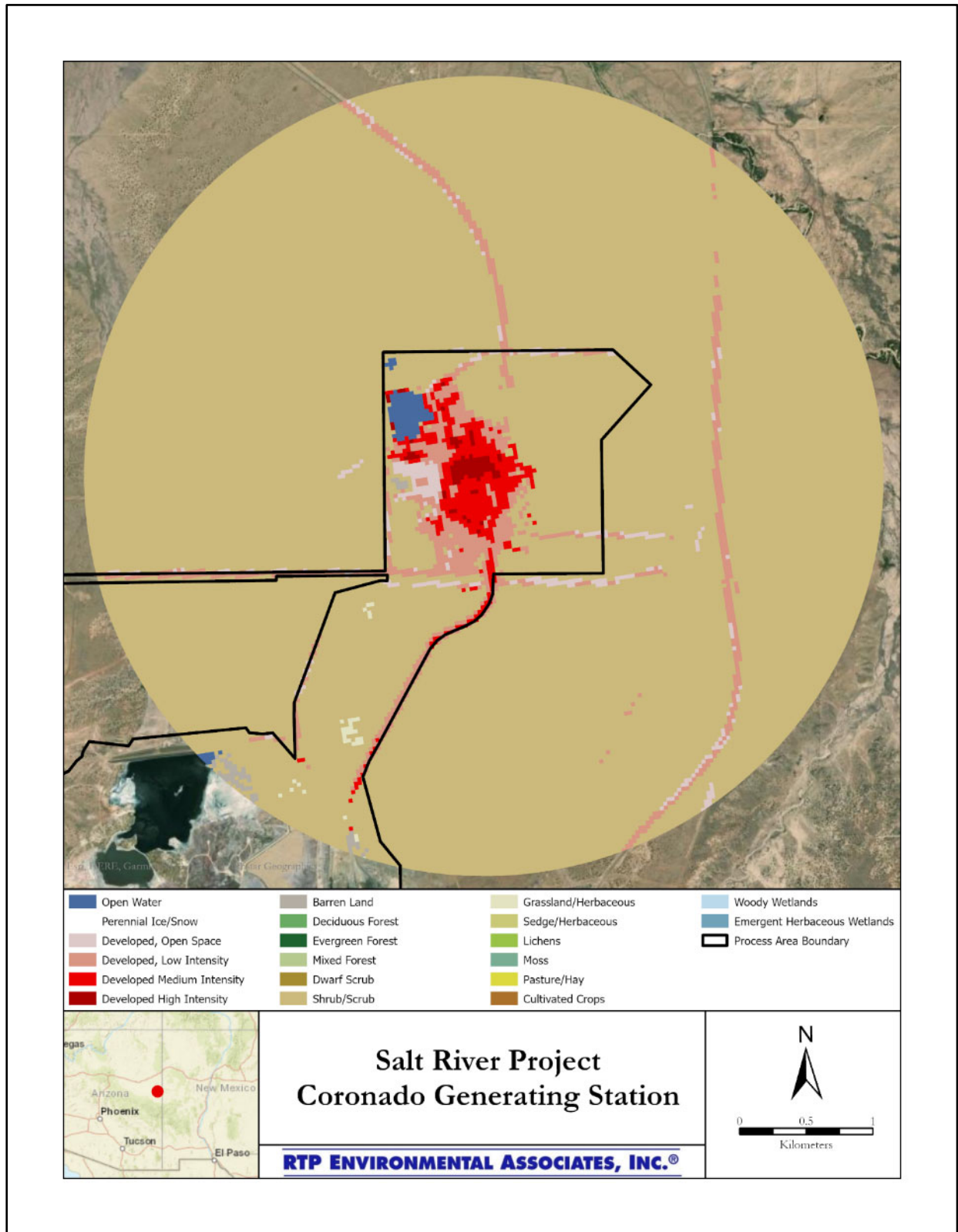


Figure 3. Land Use within Three Kilometers of CGS

4.3 Source Data

Source Characterization

Most of the modeled emission sources at the site vent to vertically orientated stacks with a well defined, unobstructed opening, and were modeled as point sources.

Stacks that are orientated horizontally will be modeled as point sources using the POINTHOR designation in AERMOD.

All source locations were based upon a NAD83, UTM Zone 12 projection.

Good Engineering Practice Stack Height Analysis

A Good Engineering Practice (“GEP”) stack height evaluation was conducted to determine appropriate building dimensions to include in the model and to calculate the GEP formula stack height used to justify stack height credit for stacks to be constructed in excess of 65m. Procedures used were in accordance with those described in the USEPA Guidelines for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations-Revised)³. GEP formula stack height, as defined in A.A.C. R18-2-332(C)(2)(a), is expressed as $H_g = 2.5 \times H$, where H_g is the GEP stack height and H is the building height. Building/structure locations were determined from a facility plot plan. The structure locations and heights were input to the USEPA’s Building Profile Input Program (BPIP-PRIME, Version 04274) computer program to calculate the direction-specific building dimensions needed for AERMOD. All structures that are located near a stack were included in the BPIP runs.

4.4 Receptor Data

Modeled receptors were placed in all areas considered as "ambient air" pursuant to 40 CFR 50.1(e). Ambient air is defined as that portion of the atmosphere, external to buildings, to which the general public has access. A process area boundary (“PAB”) was used as the ambient air boundary in the analysis and is shown in Figure 4. The PAB begins at the guard shack where fences run along each side of the access road.

This joins the fence around the main facility. A fence also runs along the evaporation pond. The rest of the PAB was determined by haul roads, which are monitored by security patrols. The receptor grid will consist of the following:

1. Receptors spaced along the PAB at 25m intervals,
2. A fine grid of receptors with 100m spacing extending to 3km from the PAB,
3. A medium grid of receptors with 500m spacing extending from 3km to 5km,
4. A coarse grid of receptors with 1,000m spacing extending from 5 to 10km,
5. A very coarse grid of receptors with 2,500m spacing extending from 10 to 25km,
6. A very coarse grid of receptors with 5,000m spacing extending from 25 to 50km.

CGS is located in eastern Arizona. Terrain within 10km of the plant site is complex. Receptor elevations and hill height scale factors were calculated with AERMAP (24142). The elevation data was one arc second National Elevation Data ("NED") obtained from the USGS. Locations were based upon a NAD83, UTM Zone 12 projection. The near-field receptor grid is presented in Figure 4.

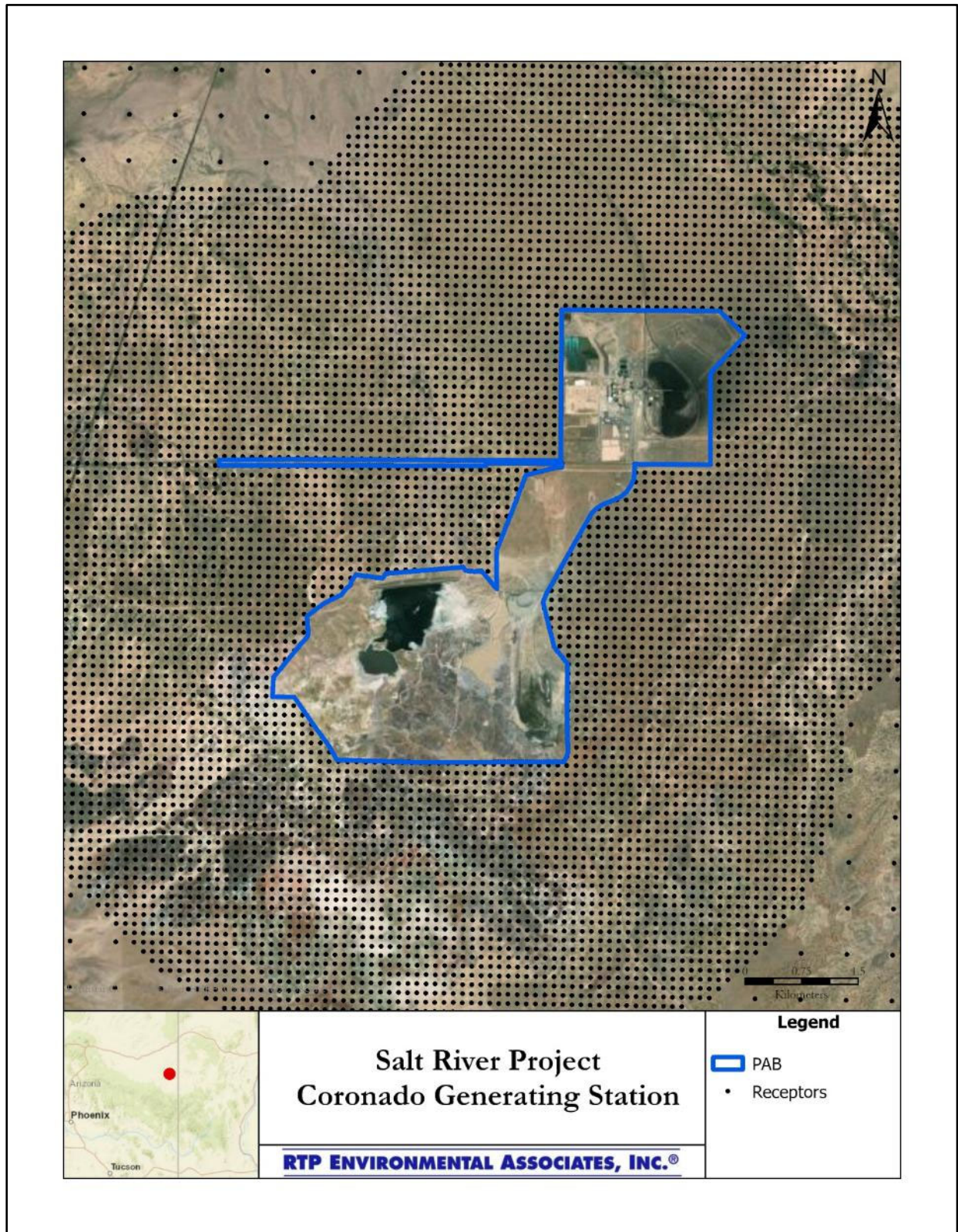


Figure 4. Near-field Receptor Grid

4.5 Meteorological Data

The 2017-2021, 5-year sequential hourly surface meteorological data collected at the St. Johns Industrial Air Park (KSJN, WBAN 93027) and upper air data from Albuquerque, New Mexico (KABQ, WBAN 72365) were used in the analysis. Data from both of these meteorological stations were processed by ADEQ using AERMET version 24132^a. ADEQ used the surface friction velocity adjustment (adj u^*) in processing the data.

As stated in Appendix W Section 8.4.1.b., the meteorological data should be selected on the basis of “spatial and climatological (temporal) representativeness as well as the ability of the individual parameters selected to characterize the transport and dispersion conditions in the area of concern.” This section further lists the following criteria that can be used to justify the representativeness:

- Spatial proximity of the meteorological site to the facility;
- Complexity of the terrain;
- Exposure of the meteorological monitoring site; and
- Period of time during which the data are collected.

St. Johns Industrial Air Park (only 14km distant) and Show Low Regional Airport (92km distant) are the only National Weather Service (“NWS”) surface meteorological stations within 100km of CGS (Table 2 and Figure 5). The complexity of the terrain is similar between St. Johns Industrial Air Park and CGS, while Show Low Regional Airport is much closer to the White Mountains and the Mogollon Rim. CGS is located in a rural area, while St. Johns Industrial Air Park and Show Low Regional Airport are both located near small cities.

ADEQ has processed the latest complete five years of data for St. Johns Industrial Air Park. The Show Low Regional Airport meteorological record is not as complete as St. Johns and has more missing and calm hours. Therefore, the data from St. Johns

^a Meteorological data was obtained on January 6, 2026.

Industrial Air Park are deemed to be the most representative meteorological data. The 2017-2021 wind rose is provided in Figure 6.

Table 2. Surface Meteorological Stations

Surface Station	Elevation (m)	Distance from CGS (km)
SRP Coronado	1,779	--
St. Johns Industrial Air Park	1,747	14
Show Low Regional Airport	1,960	92
Winslow-Lindbergh Regional Airport	1,492	172
Safford Regional Airport	967	234
Flagstaff Pulliam Airport	2,137	277
Phoenix Sky Harbor International Airport	343	341
Prescott Municipal Airport	1,528	351
Tucson International Airport	777	376
Page Municipal Airport	1,310	403
Nogales International Airport	1,194	454

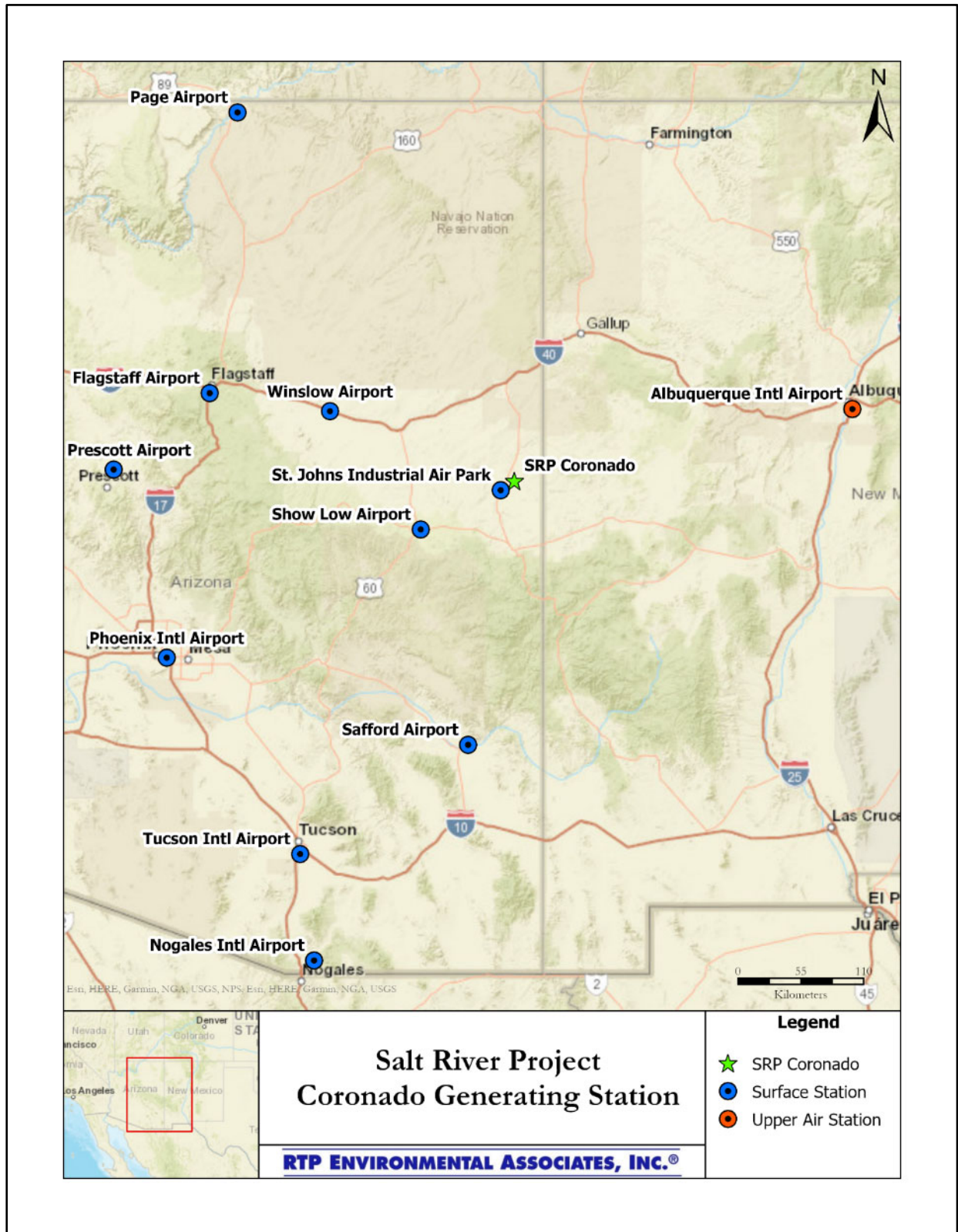
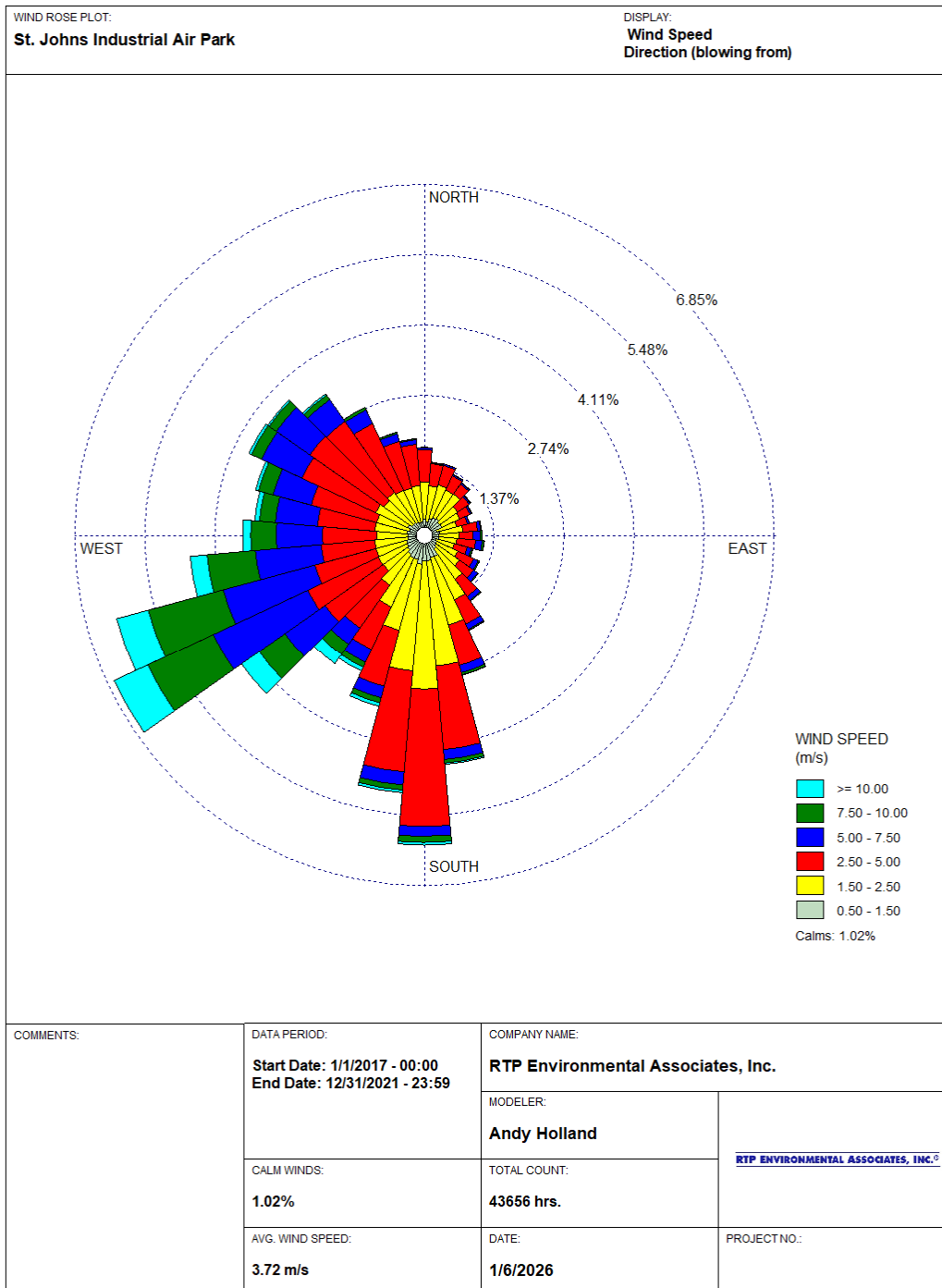


Figure 5. Location of Meteorological Stations



WRPLOT View - Lakes Environmental Software

Figure 6. 2017-2021 Wind Rose

5.0 MODELING METHODOLOGY AND RESULTS

5.1 Modeled Pollutants

Emissions of carbon monoxide (“CO”), nitrogen dioxide (“NO₂”), sulfur dioxide (“SO₂”), particulate matter (“PM”) with a diameter less than or equal to 10 micrometers (“PM₁₀”), and PM with a diameter less than or equal to 2.5 micrometers (“PM_{2.5}”) were included in the analysis.

5.2 Load Analysis

A load analysis was performed for natural gas-firing in Units 1 and 2 to determine the worst-case stack parameters. Two load scenarios were used in the analysis, a full load scenario (maximum continuous rated load) and a mid load scenario (43% of maximum continuous rated load). The stack exit temperatures and stack exit velocities for each load scenario were used in the analysis along with emission rates normalized to the full load’s emission rates. The stack parameters and emission rates used in the load analysis are shown in Table 3.

Table 3. Load Analysis Stack Parameters and Emissions

Source ID	Release Type	Source Description	Easting (m)	Northing (m)	Base Elevation (ft)	Stack Height (ft)	Temperature (°F)	Exit Velocity (ft/sec)	Stack Diameter (ft)	Emission Rate (lb/hr)
NGFULL	DEFAULT	Nat Gas Full Load	658427.44	3827741.06	5796.10	400.0	129.0	33.0	24.2	1.00
NGMID	DEFAULT	Nat Gas Mid Load	658427.44	3827741.06	5796.10	400.0	111.0	18.0	24.2	0.45

The results of the load analysis are shown in Table 4. The full load resulted in the maximum modeled impacts for all averaging periods. Therefore, the stack parameters and emission rates for that case were used in all subsequent analyses.

Table 4. Load Analysis Results

Load Level	Averaging Period	Maximum Modeled Concentration ($\mu\text{g}/\text{m}^3$)
Full	1-hour	0.1502
Mid		0.0851
Full	3-hour	0.0747
Mid		0.0514
Full	8-hour	0.0508
Mid		0.0347
Full	24-hour	0.0218
Mid		0.0146
Full	Annual	0.0043
Mid		0.0027

5.3 Significant Impact Analysis

In the significant impacts analysis, only the changes due to the Project were modeled. Normally this would entail modeling the change in emissions. However, in this case, the source stack parameters (e.g. exit temperature and exit velocity) are changing as well due to the change in fuel being burned. The change in stack parameters can have an impact on the plume; therefore, for all pollutants except NO_2 , Units 1 and 2 were modeled with their pre-Project stack parameters and negative pre-Project actual emission rates along with their post-Project stack parameters and positive post-Project potential emission rates.

In 2014 EPA published a clarification memo regarding NO_2 modeling⁴. The memo states that: "... all three tiers of NO_2 modeling are classified as screening techniques, and as such, negative emission rates should not be used to account for emission reductions when conducting dispersion modeling to determine net ambient impacts associated with emission changes for comparison to the SILs." Therefore, for NO_2 only, the model was run separately for each fuel type. The NO_2 modeling analyses used the Tier 2 (Ambient Ratio Method, ARM2) method with the EPA default minimum and maximum ratios of 0.5 and 0.9, respectively.



Units 1 and 2 pre-Project actual coal-fired heat input and actual emissions of NO₂ and SO₂ were obtained from Clean Air Markets Program Data (“CAMPD”)². For conservatism, actual CO emissions were assumed to be zero. Actual emissions of PM₁₀ and PM_{2.5} were calculated using an emission factor of 0.02 lb/MMBtu, which is conservatively low in relation to historic stack test data, and heat input in MMBtu/hr from CAMPD. Pre-Project stack exit temperature and exit flow rate came from 2022 stack testing.

Units 1 and 2 post-Project potential heat input, percentage of excess air, and emission factors for 1-hour NO₂ and 8-hour average CO are based on project engineering design information. Potential emissions of PM₁₀, PM_{2.5}, and SO₂ were calculated using the heat input and emission factors from AP-42. Potential emissions of annual NO₂ were calculated using the heat input and a conservatively assumed emission factor of 0.1 lb/MMBtu. Potential hourly CO emissions were conservatively assumed to be double the 8-hour rate. Post-Project stack exit temperature was assumed to be the same as the pre-Project temperature and the exit flow rate was calculated using the heat input, percentage of excess air, exit temperature, and constants from EPA Method 19.

Potential emissions for the auxiliary boiler in the post-Project case were calculated using the highest emission factors between natural gas and fuel oil firing. For CO, there is an increase in emission rate due to the higher emission factor for periods of natural gas firing. For other pollutants, because the emission factor is higher for periods of fuel oil firing, short-term pre- and post-Project emissions will be the same; however, due to the potential increase in annual capacity factor in conjunction with the Project, the post-Project long-term modeled emissions are greater.

For all other sources at CGS (e.g. ash handling, lime handling, coal preparation plant, etc.), emission rates are either not changing due to the Project or will have a decrease

² [Clean Air Markets Program Data \(CAMPD\) | US EPA](#)

in emissions. To be conservative, emissions from these sources were assumed to remain at pre-Project levels and were not included in the significant impact analysis.

Modeled stack parameters used in the significant impact analysis are shown in Table 5, while the emission rates are shown in Table 6.

Table 5. Significant Impact Analysis Stack Parameters

Source ID	Release Type	Source Description	Easting (m)	Northing (m)	Base Elevation (ft)	Stack Height (ft)	Temperature (°F)	Exit Velocity (ft/sec)	Stack Diameter (ft)
UNIT1_C	DEFAULT	Unit 1 – Coal	658427.44	3827741.06	5796.10	400.0	129.0	52.3	24.2
UNIT2_C	DEFAULT	Unit 2 – Coal	658437.80	3827408.07	5797.21	400.0	127.0	55.3	24.3
AUX_C	DEFAULT	Auxiliary Boiler (current operations)	658365.74	3827628.38	5796.75	210.0	718.0	50.0	6.0
UNIT1_NG	DEFAULT	Unit 1 – Natural Gas	658427.44	3827741.06	5796.10	400.0	129.0	33.0	24.2
UNIT2_NG	DEFAULT	Unit 2 – Natural Gas	658437.80	3827408.07	5797.21	400.0	127.0	33.0	24.3
AUX_NG	DEFAULT	Auxiliary Boiler (future operations)	658365.74	3827628.38	5796.75	210.0	718.0	50.0	6.0

Table 6. Significant Impact Analysis Emission Rates

Source ID	Emission Rate (lb/hr)											
	CO 1-hr	CO 8-hr	NO ₂ 1-hr	NO ₂ Annual	SO ₂ 1-hr	SO ₂ 3-hr	SO ₂ 24-hr	SO ₂ Annual	PM ₁₀ 24-hr	PM ₁₀ Annual	PM _{2.5} 24-hr	PM _{2.5} Annual
UNIT1_C	0.00	0.00	1705.66	498.42	-1337.20	-798.70	-143.85	-13.86	-88.34	-41.68	-88.34	-41.68
UNIT2_C	0.00	0.00	1165.52	155.01	-373.20	-241.33	-73.64	-13.97	-91.53	-48.65	-91.53	-48.65
AUX_C	-5.50	-5.50	26.40	2.64	-2.86	-2.86	-2.86	-0.29	-3.63	-0.36	-3.63	-0.36
UNIT1_NG	661.49	330.74	1157.60	413.43	2.43	2.43	2.43	2.43	30.80	30.80	30.80	30.80
UNIT2_NG	661.49	330.74	1157.60	413.43	2.43	2.43	2.43	2.43	30.80	30.80	30.80	30.80
AUX_NG	13.18	13.18	26.40	13.20	2.86	2.86	2.86	1.43	3.63	1.82	3.63	1.82

Maximum modeled concentrations of CO, SO₂, PM₁₀, and PM_{2.5} were compared to the significant impact levels (“SILs”), as defined in 40 CFR 51.165 and A.A.C.

R18-2-401(27).

Net ambient impacts associated with the changes between the pre-Project and post-Project NO₂ emissions were calculated using output plot files from AERMOD. For 1-hour NO₂, the output plot files contain the five-year average of the maximum daily 1-hour modeled concentration at each receptor for each fuel scenario. The pre-Project

concentrations were subtracted from the post-Project concentrations, and the maximum difference was compared to the SIL. For annual NO₂, the output plot files contain the annual average modeled concentration for each year at each receptor for each fuel scenario. The pre-Project concentrations were subtracted from the post-Project concentrations, and the maximum difference was compared to the SIL.

The PSD Class II SILs and modeled concentrations are shown in Table 7. As shown, maximum modeled net impacts for 1-hour and annual NO₂ are greater than their respective SILs and require a NAAQS modeling analysis.

Table 7. Class II Significant Impact Analysis Results

Pollutant	Averaging Time	Maximum Modeled Net Impact (µg/m ³)	Class II Significant Impact Levels (µg/m ³)
CO	1-hour	203.45	2,000
	8-hour	31.63	500
NO ₂	1-hour	17.77	7.5
	Annual	1.42	1
SO ₂	1-hour	0.01	7.8
	3-hour	0.002	25
	24-hour	0.001	5
	Annual	0.006	1
PM ₁₀	24-hour	0.059	5
	Annual	0.03	1
PM _{2.5}	24-hour	0.02	1.2
	Annual	0.022	0.13

5.4 NAAQS Analysis

Following the determination of significant impacts, a refined air quality analysis to determine compliance with the NAAQS was conducted. This analysis was conducted to determine compliance with the NAAQS only for pollutants modeled as having significant impacts in the initial analysis, 1-hour and annual NO₂, using the post-Project emissions and stack parameters for Units 1 and 2, and the auxiliary boiler. The receptors modeled in the NAAQS analyses were limited to those showing a significant impact for each averaging period. Five years of meteorological data was again used in this analysis.

Nearby Source Inventory

Existing non-modified CGS sources and nearby sources were included in the NAAQS analysis. An offsite inventory of sources within 100km was provided by ADEQ. The New Mexico Environment Department’s (“NMED”) MergeMaster Database³ was searched and no NO₂ sources were found within 100km of CGS.

The 20D screening criterion was employed to eliminate sources outside of the SIA that are not likely to influence the analysis. Total facility potential to emit (“PTE”) emissions were used in the 20D evaluation (Table 8). If the total facility PTE was greater than 20 times the distance from the facility to CGS (“D”), the facility’s sources were included in the NAAQS analysis.

Table 8. Nearby Sources 20D Analysis

Facility ID	Facility Name	NOx (tpy) ^a	Distance (km)	SIA	20D	Include in Analysis?
3222	Tucson Electric Power Co. – Springerville	9,629	30.4	50	608	Yes
34839	Novo Biopower LLC	241	97.9	50	1,958	No

a. PTE rates provided by ADEQ.

Tucson Electric Power Co. – Springerville is located inside the SIA and was included in the NAAQS analysis. Novo Biopower LLC is located outside the SIA and has total emissions less than 20D; therefore, it was excluded from the NAAQS analysis.

See Table 9 for a listing of all non-modified CGS sources included in the NAAQS modeling analysis, along with their respective stack parameters. Note that the existing emergency generator, fire pump engines, and booster pump were included in the 1-hour NO₂ modeling at their annualized PTE emission rates (i.e., multiplied by 500 hours/year and divided by 8,760 hours/year) since they are considered to be intermittent sources (operating less than 500 hours per year). Also, the maximum hourly PTE emissions for these units were annualized for the annual NO₂ NAAQS modeling.

³ [MergeMaster Modeling Files](#)

Table 9. Non-Modified CGS Sources in the NO₂ NAAQS Analysis

Source ID	Release Type	Source Description	Easting (m)	Northing (m)	Base Elevation (ft)	Stack Height (ft)	Temperature (°F)	Exit Velocity (ft/sec)	Stack Diameter (ft)
FPA	POINTHOR	Emergency Fire Pump (A)	657913.82	3827748.65	5790.55	9.5	848.0	207.0	0.33
FPB	DEFAULT	Emergency Fire Pump (B)	657934.21	3827766.62	5789.57	20.0	954.0	254.37	0.41
BP	POINTHOR	Booster Pump	658360.16	3827642.73	5796.82	14.0	848.0	207.0	0.62
EG	DEFAULT	Diesel Generator	658356.74	3827642.77	5796.88	15.0	726.0	207.0	0.62

Listings of all nearby sources included in the NAAQS modeling analysis are provided in Tables 10 and 11.

Table 10. Nearby Point Sources in the NO₂ NAAQS Analysis

Source ID	Release Type	Source Description	Easting (m)	Northing (m)	Base Elevation (ft)	Stack Height (ft)	Temperature (°F)	Exit Velocity (ft/sec)	Stack Diameter (ft)
AZ001	DEFAULT	TEP Springerville Unit #1	668888.61	3799019.30	6979.20	500.0	173.0	144.40	20.0
AZ002	DEFAULT	TEP Springerville Unit #2	668805.79	3799017.81	6979.82	500.0	187.0	166.32	20.0
AZ003	DEFAULT	TEP Springerville Unit #3	668686.17	3799015.65	6976.05	495.0	193.0	157.13	20.0
AZ004	DEFAULT	TEP Springerville Unit #4	668686.17	3799015.65	6976.05	500.0	189.0	156.12	20.0

Table 11. Nearby Area Sources in the NO₂ NAAQS Analysis

Source ID	Source Description	Easting (m)	Northing (m)	Base Elevation (ft)	Release Height (ft)	Easterly Length (ft)	Northerly Length (ft)	Angle from North (degrees)
AZ005	TEP Springerville Miscellaneous Small Sources	668962.43	3799009.54	6977.26	10.0	1.0	1.0	0.0

Modeled emission rates of nearby sources were calculated using Table 8-2 from Appendix W. Permit limits for TEP Springerville Units #1 and #2 (TEP #1 and TEP #2) included a short-term emission factor of 0.697 lb/MMBtu and an annual emission factor of 0.22 lb/MMBtu. The permit limit for TEP Springerville Unit 3 (TEP #3) is 1.6 lb/MWh and for TEP Springerville Unit 4 (TEP #4) it is 1.0 lb/MWh. Maximum hourly heat input (MMBtu), annual average hourly heat input (MMBtu), maximum hourly gross load (MWh), and annual average hourly gross load (MWh) were calculated from CAMPD data for the

last two full years of data (October 1, 2023 through September 30, 2025). The permitted emission factors were multiplied by the maximum hourly heat input for TEP #1 and TEP #2, and by the maximum hourly gross load for TEP #3 and TEP #4 to determine the modeled short-term emission rates. To determine the modeled long-term emission rates, the permitted emission factors were multiplied by the annual average hourly heat input for TEP #1 and TEP #2, and by the annual average hourly gross load for TEP #3 and TEP #4. Modeled emissions of the TEP Springerville miscellaneous small sources was conservatively estimated to be twice the maximum actual annual emissions over the past three years. Table 12 contains the emission rates of all nearby sources.

Table 12. Nearby Source Modeled Emission Rates

Source ID	1-hour NO ₂ (lb/hr)	Annual NO ₂ (lb/hr)
FPA	0.47	0.47
FPB	0.08	0.08
BP	1.10	1.10
EG	1.61	1.61
AZ001	2,730.50	506.55
AZ002	2,829.75	474.02
AZ003	726.40	399.19
AZ004	451.00	260.97
AZ005	0.642	0.642

Background Monitor Selection

In November of 2024, EPA released new guidance relating to identification of the most representative monitored background value to use in NAAQS analyses, the Guidance on Developing Background Concentrations for Use in Modeling Demonstrations⁵.

According to this guidance, CGS could be considered an isolated source, especially since the closest source, TEP Springerville, is being explicitly modeled. Monitors in Arizona and New Mexico are listed in Table 13 and shown in Figure 7.

Table 13. NO₂ Monitors

Monitor	AQS ID	Measurement Scale	Monitor Objective
West Phoenix, AZ	04-013-0019	Neighborhood	Population Exposure
Central Phoenix, AZ	04-013-3002	Neighborhood	Highest Concentration
Buckeye, AZ	04-013-4001	Urban Scale	Upwind Background
Thirty-Third, AZ	04-013-4020	Microscale	Source Oriented
Eastwood, AZ	04-013-4021	Microscale	Source Oriented
JLG Supersite, AZ	04-013-9997	Neighborhood	Population Exposure
22nd & Craycroft, AZ	04-019-1011	Neighborhood	Population Exposure
Childrens Park NCORE	04-019-1028	Neighborhood	Highest Concentration
1ZB Bloomfield, NM	35-045-0009	Neighborhood	General/Background
Navajo Dam, NM	35-045-0018	Middle Scale	Regional Transport
Chaco Culture NHP, NM	35-045-0020	Regional Scale	General/Background
1H Substation, NM	35-045-1005	Regional Scale	General/Background
Del Norte High School, NM	35-001-0023	Neighborhood	Population Exposure
South Valley, NM	35-001-0029	Regional Scale	Regional Transport

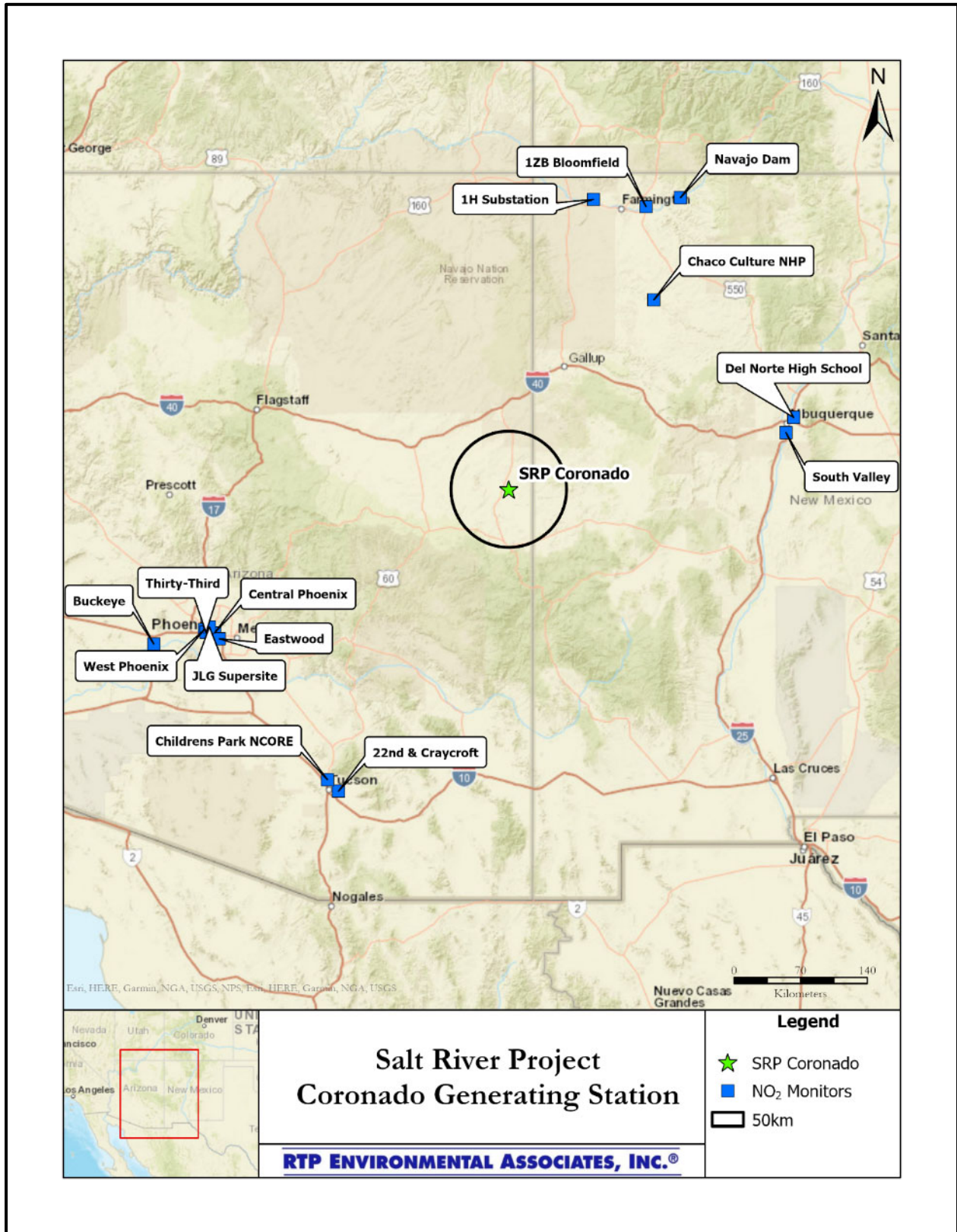


Figure 7. NO₂ Monitors

The most representative monitor will be one that is in a similar dispersion environment compared to that of CGS and should have a regional measurement scale and a monitor objective of General/Background. The representative monitor should not be impacted by many, or any, point source emissions. The main criteria to look for in this case is a monitor that is impacted by similar non-point emissions, mainly mobile emissions.

The monitors located in Phoenix, Tucson, and Albuquerque are located in urban areas with many nearby sources and large concentrations of vehicle traffic. These monitors are not representative of the dispersion environment at CGS. This leaves the four monitors in San Juan County, New Mexico. Of these, two meet the measurement scale and monitor objective criteria, Chaco Culture NHP and 1H Substation. The 2021 land use near these two monitors is shown in Figure 8, with red shades denoting developed areas and roads. 1H Substation is the most representative and conservative of the dispersion environment at CGS due to the location of nearby cities and roads. The 2022-2024 design values for this monitor are 19 ppb ($35.7 \mu\text{g}/\text{m}^3$) for 1-hour and 3 ppb ($5.7 \mu\text{g}/\text{m}^3$) for annual.

NAAQS Compliance Assessment

Ambient background concentrations were then added to assess NAAQS compliance. The modeled and monitored values shown in Table 14 were used for this assessment. The NAAQS results shown in Table 15 indicate compliance with the NAAQS.

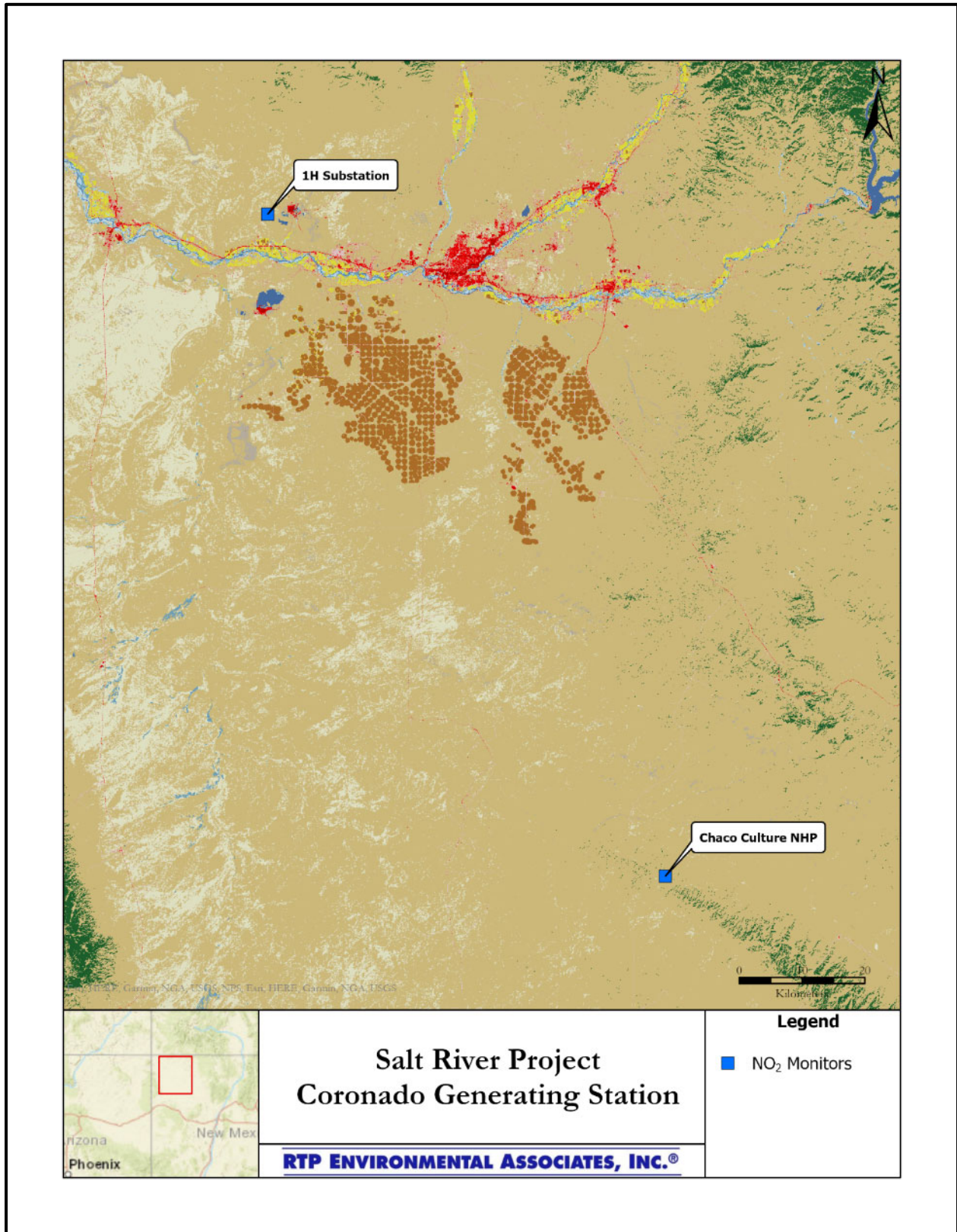


Figure 8. Regional Background NO₂ Monitors

Table 14. Monitored and Modeled Values Used to Assess NAAQS Compliance

Pollutant	Averaging Time	Monitored Value	Modeled Value
NO ₂	1-hour	98 th percentile of the annual distribution of daily maximum 1-hour values averaged over three years	98 th percentile of the annual distribution of daily maximum 1-hour values averaged over five years
	Annual	Maximum annual concentration over three years	Maximum annual concentration over five years

Table 15. NAAQS Analysis Results

Pollutant	Averaging Time	Modeled Impact (µg/m ³)	Monitor Background (µg/m ³)	Total Concentration (µg/m ³)	NAAQS (µg/m ³)
NO ₂	1-hour	130.4	35.7	166.12	188
	Annual	3.5	5.7	9.2	100

REFERENCES

1. Guideline on Air Quality Models. Appendix W of 40 CFR Part 51, 82 FR 5182, November 29, 2024.
2. Air Quality Modeling Guidelines for Arizona Air Quality Permits. Facilities Emissions Control Section, Air Quality Division, Arizona Department of Environmental Quality, November 1, 2019.
3. Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document for Stack Height Regulations (Revised)). EPA-450/4-80-023R, U.S. Environmental Protection Agency, June 1985.
4. Clarification on the Use of AERMOD Dispersion Modeling for Demonstrating Compliance with the NO₂ National Ambient Air Quality Standard. U.S. Environmental Protection Agency, September 30, 2014.
5. Guidance on Developing Background Concentrations for Use in Modeling Demonstrations. EPA-454/R-24-003, U.S. Environmental Protection Agency, November 2024.

EXHIBIT "4"

1 condensers, selective catalytic reduction systems, and cooling towers. Equipment that is no
2 longer needed for operations would be abandoned in place or removed as necessary.

3 4. To supply CGS with natural gas, a new natural gas lateral pipeline and fuel
4 supply yard will be constructed, operated and maintained by a third-party gas supplier. SRP
5 anticipates that the fuel supply yard will be constructed and located within the fence line
6 of the CGS main plant site.

7 5. To connect the fuel supply yard to the plant, SRP will need to construct a
8 pipeline from the fuel supply yard to an interior gas yard for conditioning before piping the
9 natural gas to the boilers.

10 **CGS Repower Project Timeline and Cost**

11 6. SRP is in early phases of the CGS Repower Project as we complete
12 environmental permitting, early-stage engineering design, and coordinate with potential
13 third-party gas suppliers. The anticipated Commercial Operation Date for the project is
14 December 29, 2029, which was established to ensure that CGS could remain in operation
15 as needed into the 2040's while meeting greenhouse gas emissions standards that went into
16 effect in July 2024. Even if the greenhouse gas standards are repealed, SRP is committed
17 to ceasing coal-fired generation by 2032, and as noted above, the Project is essential for
18 SRP to meet its sustainability goals while maintaining reliability and affordability. The
19 construction of the natural gas lateral is anticipated to begin in late 2028, after approval by
20 the Federal Energy Regulatory Commission.

21 7. The cost to construct and modify the CGS plant to convert to natural gas is
22 estimated to cost \$100 million.

23 **Economic Impact**

24 8. As a political subdivision of the State of Arizona, SRP is exempt from local
25 property taxes and is authorized by statute to make voluntary contributions in lieu of

1 property taxes pursuant to A.R.S. § 48-242. Accordingly, SRP voluntarily makes a
2 contribution, comparable to property taxes, which is expected to be approximately \$9
3 million annually throughout the life of the Project.

4 9. The Repower Project will allow SRP to maintain a significant workforce at
5 CGS. SRP expects the CGS facility to require fewer employees than current staffing levels,
6 but SRP will work to support employees who may be impacted throughout the transition.

7 **Public & Stakeholder Outreach**

8 10. SRP completed a comprehensive public involvement program to support the
9 CGS Repower Project and maintain transparency with stakeholders. To reach surrounding
10 residents and agencies, SRP instituted multiple public participation activities, including
11 multiple public meetings, project mailers, a telephone line, an email, newspaper and social
12 media advertisements, a dedicated website, and agency briefings.

13 11. A bilingual dedicated project website was launched on August 20, 2025. The
14 website contains project information, news releases, anticipated timelines, details on the
15 public meetings/open houses and information on how to contact SRP. ([Coronado](#)
16 [Generating Station Repower Project | SRP](#))

17 **Coal Community Transition**

18 12. SRP formed the Coal Community Transition team to address economic and
19 community concerns as SRP transitions away from coal generation. This team has hosted
20 bi-monthly meetings since 2022 to address community concerns and has provided
21 economic support in the form of grants to several Apache County community and non-
22 profit organizations. In addition to these meetings, the Coal Community Transition team
23 hosted an informational booth at the 2025 Apache County Fair (August 20-23, 2025) to
24 inform county residents about the CGS Repower Project and upcoming public meetings.
25 The Apache County Fair hosts approximately 24,000 local attendees each year. During this

1 event, SRP engaged with several thousand community members, introduced them to the
2 project, answered questions and extended invitations to the upcoming September 24, 2025,
3 public meeting. Community members expressed appreciation and positive feedback,
4 noting their enthusiasm to see SRP actively involved in the community.

5 **Public Meetings**

6 13. Three project-specific open houses were held to provide the public with
7 information on the CGS Repower Project and CEC process. First, an in-person and virtual
8 community open house was held on September 24, 2025, at the St. Johns High School
9 Auditorium. This open house drew 69 participants (52 in-person attendees and 17 virtual
10 attendees) and four comments, all of whom supported the project. A second in-person open
11 house was held on December 16, 2025, at the St. Johns High School Library, followed by
12 a virtual open house on December 17, 2025. These combined events had 38 attendees, and
13 six comments were submitted.

14 **Mailings, News Releases, and Social Media Advertisements**

15 14. SRP sent public notification letters to property owners in the Towns of St.
16 Johns, Springerville and Eager, which yielded 4,338 mailing addresses. The notification
17 letters were mailed on September 10 and December 1, 2025, to alert community members
18 of open houses held on September 24, December 16, and December 17, 2025. Additionally,
19 SRP published news releases in the White Mountain Independent on June 24 and December
20 9, 2025, to inform local communities of the public meetings and ran bilingual social media
21 advertisements over two one-week periods in September and December promoting each
22 public open house to social media users within the notification area. In total, the social
23 media ads resulted in 877 website clicks, or interactions.

Stakeholder Outreach

15. In late November 2025, a stakeholder outreach letter was sent to state and local government officials including: the Apache County Planning and Zoning Commission, Board of Directors, Community Development Department; the Town of Saint Johns; the Town of Eagar; the Town of Springerville; and Arizona State House Representatives. A full list of recipients is included in the table below. Several entities responded via email supporting the project. The Towns of Eagar and Springerville submitted a formal letter of support included in Exhibit A, attached hereto. SRP did not receive any comments objecting to the CGS Repower Project.

Contact Name	Title	Jurisdiction/Agency	Response
Matthew Fish	Community Development Director	Apache County	Yes, to provide comment per direction of Apache County BOS
Preston Raban	Economic Development Director	Apache County	Yes, Support
Travis Johnson	P&Z Commission Member	Apache County	No Response to date
Brad Peterson	P&Z Commission Member	Apache County	No Response to date
Bob Pollock	P&Z Commission Member	Apache County	No Response to date
Michael Bragiel	P&Z Commission Member	Apache County	No Response to date
Carey Dobson	P&Z Commission Member	Apache County	No Response to date
Bobby Fite	P&Z Commission Member	Apache County	No Response to date
Brad Jarvis	P&Z Commission Member	Apache County	No Response to date
Kay Hauser	P&Z Commission Member	Apache County	No Response to date
Dan Muth, Chairman	P&Z Commission Member	Apache County	No Response to date
Nelson Davis	Board Member - District III	Apache County	No Response to date
Alton Joe Shepherd	Board Member - District II	Apache County	No Response to date
Dr. Joe Shirley, Jr.	Board Member - District I	Apache County	No Response to date
Ryan Patterson	County Manager	Apache County	No Response to date
Chris Chiesl	Community Development Director	St. Johns	No Response to date
Paul Ramsey	City Manager	St. Johns	No Response to date
Cindy Lee Richins	City Clerk	St. Johns	No Response to date

Contact Name	Title	Jurisdiction/Agency	Response
Spence Udall	Mayor	St. Johns	Yes, Support
Jill Patterson	Vice Mayor	St. Johns	Yes, Support
Tony Raykovitz	Councilman	St. Johns	Yes, Support
Nathan Wengert	Councilman	St. Johns	Yes, Support
Joe Greene	Councilman	St. Johns	Yes, Support
Mandi Huth	Councilwoman	St. Johns	Yes, Support
Brad Jarvis	Councilman	St. Johns	Yes, Support
Kelsi Miller	Town Clerk	Springerville	Yes, forwarded to Mayor and Council
Ted Soltis	Town Manager	Springerville	Yes, Support
Richard Davis	Mayor	Springerville	No Response to date
Doug Henderson	Vice Mayor	Springerville	No Response to date
Florencio Lozoya	Council Member	Springerville	No Response to date
Stormy Palmer	Planning and Zoning Director	Springerville	No Response to date
Terry Shove	P&Z Commission Chairperson	Springerville	No Response to date
Tony Contreras	P&Z Commission	Springerville	No Response to date
Bill Lucas	P&Z Commission	Springerville	No Response to date
Daniel Chavez	P&Z Commission	Springerville	No Response to date
Steve Huggenberger	P&Z Commission	Springerville	No Response to date
Jessica Vaughan	Town Clerk	Eagar	Yes, forwarded to Mayor and Council
Guy Phelps	Mayor	Eagar	Yes, Support
Marsha Tucker	Vice-Mayor	Eagar	Yes, Support
Brandon Slade	Councilman	Eagar	Yes, Support
Bryce Burnham	Councilman	Eagar	Yes, Support
Ray Hamblin	Councilman	Eagar	Yes, Support
William Greenwood	Councilman	Eagar	Yes, Support
Titan Merrill	Councilman	Eagar	Yes, Support
Britney Reynolds	Community Development Director	Eagar	Yes, the town will be sending comments asap
Chelsea Slade	P&Z Commission Member	Eagar	No Response to date
Becky Crosby	P&Z Commission Member	Eagar	No Response to date
JoElla Younkin	P&Z Commission Member	Eagar	No Response to date
Kristi Pendrod	P&Z Commission Member	Eagar	No Response to date
Brenda Ciminski	P&Z Commission Member	Eagar	No Response to date
Debra Seeley	P&Z Commission Member	Eagar	No Response to date

Contact Name	Title	Jurisdiction/Agency	Response
Brannon Eagar	P&Z Commission Member	Eagar	No Response to date
Mae Peshlakai	Representative	AZ House of Reps	No Response to date
Myron Tsosie	Representative	AZ House of Reps	No Response to date
Teresa Hatathile	Senator	AZ Senate	No Response to date
Ginger Ritter	Project Evaluation Program Supervisor	Arizona Game and Fish Department	Yes, a response was provided by her colleague Elizabeth Johnston asking for additional information regarding the natural gas pipeline when available.

Community Support

16. Overall, SRP has carried out a comprehensive public involvement program to support the CGS Repower Project. I personally participated in each activity discussed above, and throughout all activities the project has received overwhelming support from members of the public, local governments, and other stakeholders.

System Impact Study

17. SRP retained Stantec Consulting Ltd. (Stantec) to perform a reliability study for the CGS Repower Project. The study used a base case provided by SRP which includes existing and scheduled SRP facilities and power purchasing agreements. Using the base case, Stantec prepared a pre-project and post-project case and performed five analyses to assess the impact of the CGS Repower Project on the surrounding bulk electric system which encompasses both the SRP and neighboring transmission system. The five analyses conducted were: (1) Power Flow Contingency Analysis (2) Short Circuit and Breaker Duty Analysis (3) Post-Transient Study (4) Transient Stability Study (5) Power Factor Test. For the study, Stantec assumed the conversion would increase the CGS net capacity from 762 MW to 812 MW. Exhibit A hereto, the System Impact Study (SIS), contains Critical

1 Energy/Electric Infrastructure Information or confidential information, and will be
2 provided to ACC Staff upon execution of a protective agreement.

3 18. The reliability study indicated that, overall, minimal impacts to power flow
4 and stability would occur as a result of the CGS Repower Project. The Power Flow
5 Contingency Analysis indicated that the outage of a single transformer in the existing
6 parallel pair of the step-up transformers (500/345 kV) at the main plant site could result in
7 an overload of the remaining transformer. To mitigate this potential impact, SRP is
8 considering the addition of a third transformer. No additional impacts to power flow or
9 stability were identified in the reliability study.

10 I declare under penalty of perjury that the foregoing is true and correct to the best
11 of my knowledge and belief.

12 Dated: 01/12/2026



Hayden Fennell
Senior Project Origination Consultant
Salt River Project Agricultural
Improvement and Power District

EXHIBIT A



December 2, 2025

Salt River Project Agricultural Improvement and Power District
2046 Riverview Auto Drive, Suite 400
Mesa, AZ. 85201

RE: SRP's Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station

To Whom It May Concern,

The Town of Eagar wishes to express our strong support for the conversion at the Coronado Generating Station facility to burn natural gas. We feel this conversion will allow continued stable electricity for the great State of Arizona as we grow as a hub for data centers and many other industries. As we all progress, the Town of Eagar wishes to be able to support industry which will bring stable, family supporting jobs and attract other businesses, industry and tourism to our community. We appreciate the working relationship that has been forged between the Town and SRP and hope to continue to refine it moving forward.

Sincerely,

Mayor Guy Phelps

Titan Merrill

Vice Mayor Marsha Tucker

Bryce Burnham

Ray Hamblin

Brandon Slade

William Greenwood

Where Roads Hit the Trails

P.O. Box 1300 * 22W 2nd Street * Eagar, AZ 85925 *
928-333-4128 * eagaraz.gov



418 E. Main Street, Springerville, AZ 85938 • Phone (928)333-2656

November 25, 2025

Salt River Project Agricultural Improvement and Power District (SRP)
2046 Riverview Auto Drive, Suite 400
Mesa, AZ 85201

RE: SRP's Application to Amend the Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station

Dear Teresa O'Neil:

I am writing to express my strong support for converting the Coronado Generating Station (CGS) facility to burn natural gas. The conversion will allow CGS not only to continue to provide a reliable source of electricity for the area but will also provide jobs for our residents.

Sincerely,



Ted Soltis
Springerville Interim Town Manager

Via Email: Teresa.Oneil@kimley-Horn.com

EXHIBIT B

**The System Impact Study
will be provided to ACC
Staff upon execution of a
Protective Agreement**

EXHIBIT "5"

1 Environmental Policy Act and provides other regulatory oversight.

2 7. As summarized below and more fully detailed in Environmental Narrative
3 Report attached hereto as Exhibit A, the environmental impacts resulting from the CGS
4 Repower Project will be minimal given that the changes occur within the existing main
5 plant site.

6 8. A significant part of the CGS Repower Project requires performing internal
7 changes to the existing boiler systems including installing new burners and igniters.

8 9. The other major change is construction of a natural gas supply yard within
9 the main plant site and a delivery system to transport natural gas from a supply yard to the
10 boilers. The impact of these modifications to the existing plant site is considered in the
11 environmental analysis presented in the Environmental Narrative Report and summarized
12 in this declaration.

13 **Project Location**

14 10. The existing CGS main plant site is located along U.S. Highway 191,
15 approximately 6 miles northeast of St. Johns, in Apache County. The CGS main plant site
16 is within Section 33 of Township 14 North, Range 29 East, Gila-Salt River Principal
17 Meridian, as depicted on the St. Johns North, Arizona, United States (US) Geological
18 Survey 7.5-minute topographic quadrangle. (See Environmental Report, Figure 1)

19 **Land Use and Recreation**

20 11. Kimley-Horn examined the impact of the CGS Repower Project on land use.
21 (See Environmental Narrative Report, Section 3).

1 12. The CGS Repower Project would be constructed within the existing footprint
2 of the CGS main plant site, an existing industrial land use, where no plans for conflicting
3 development exist.

4 13. There are no parks, trails, or recreation facilities located within the CGS main
5 plant site, and the CGS main plant site is not available for recreational purposes. Arizona
6 State Land Department (ASLD) lands to the west of the CGS main plant site are available
7 for recreation opportunities. Access to nearby ASLD lands would not be affected during
8 construction of the CGS Repower Project, and the continued plant operations will not
9 change or alter existing recreational areas in the areas surrounding the plant.

10 14. The CGS Repower Project is compatible with existing and planned land uses,
11 and land use impacts from the CGS Repower Project will be negligible.

12 **Scenic and Visual Resources**

13 15. Kimley-Horn analyzed the potential visual impacts from the CGS Repower
14 Project. (See Environmental Narrative Report, Section 3).

15 16. The main plant site is surrounded by open desert with scattered residences,
16 the nearest of which is located 1.3 miles north of CGS main plant site. St. Johns, the nearest
17 incorporated community located approximately 6 miles southwest of the CGS main plant
18 site. No scenic resources were identified within an approximate one-mile radius of the CGS
19 main plant site.

20 17. CGS is visible as a major industrial feature seen from many locations
21 between St. Johns and CGS, including along US Highway 191 and on ASLD lands, utilized
22 for recreation purposes, adjacent to the CGS main plant site.

23 18. Although the addition of a fuel supply yard and associated infrastructure to
24 bring natural gas to the boilers will add new visual elements to the CGS main plant site,
25 due to the scale of the fuel yard and location within the CGS main plant site, these additions

1 are not anticipated to attract attention from surrounding viewpoints. These additional
2 facilities would be compatible with the form, line, surface colors, and textures of existing
3 structures, much smaller in scale relative to existing objects in view, and visually
4 subordinate to the features of the existing landscape.

5 19. Overall, there is no material visual impact.

6 **Cultural Resources**

7 20. Kimley-Horn oversaw the analysis of potential impact of the CGS Repower
8 Project on cultural resources. See Appendix C of the Environmental Narrative Report.

9 21. As noted above, CGS Repower Project will occur within the existing main
10 plant site.

11 22. Prior to construction of the existing CGS, the main plant site was surveyed
12 for cultural resources, no sites were identified within the main plant site.

13 23. In connection with the CGS Repower Project, a new Class III cultural
14 resources survey was completed for areas within the main plant site which are not currently
15 covered by pavement, buildings, and other infrastructure. The survey did not identify any
16 cultural resource sites.

17 24. The CGS Repower Project will have no impact on cultural resources.

18 **Biological Resources**

19 25. Kimley-Horn analyzed the potential impact to wildlife and plants from the
20 CGS Repower Project. (See Environmental Narrative Report, Section 3).

21 26. The CGS main plant site spans approximately 640 acres, enclosed by a
22 perimeter chain-link fence. Most of CGS main plant site is developed or heavily disturbed.
23 Of the entire main plant site, approximately 120 acres constitutes potential desert habitat
24 within the main plant site, but this habitat is degraded. While the potential exists for the
25 undeveloped portions of the main plant site to be used by migratory birds, bats, and insects,

1 these portions of the CGS main plant site exhibit relatively low value habitat for most
2 wildlife.

3 27. Even if some of this degraded habitat is removed for the CGS Repower
4 Project, undisturbed habitats are available in the open desert areas surrounding the CGS
5 Repower Project that provide suitable habitats for these species to utilize.

6 28. This setting provides minimal habitat for plants and animals including
7 special status species. Special status species would not experience long-term detrimental
8 impacts related to the loss or alteration of vegetative cover within the plant site based on a
9 lack of suitable habitat within the existing facilities.

10 29. Because of the industrialized use of the area and low-value habitat, the
11 Project is not expected to materially impact biological resources.

12 **Conclusion**

13 30. It is my expert opinion that the CGS Repower Project would have no
14 significant environmental impacts. The CGS Repower Project is compatible with existing
15 and planned land uses. The proposed facilities would be compatible with the form, line,
16 surface colors, and textures of existing structures and is not anticipated to attract attention
17 or result in visual contrast. No cultural resource sites were identified within the main plant
18 site. Because the CGS Repower Project is in an industrialized area with degraded, low-
19 value habitat, there will be no material impacts to biological resources. In summary, the
20 CGS Repower Project is environmentally compatible with existing and future land uses,
21 and any environmental resource impacts are negligible.

1 I declare that the foregoing is true and correct to the best of my knowledge,
2 information, and belief.

3 Dated: 01/12/2026

4 

5 _____
6 Teresa O'Neil
7 Environmental Planner
8 Kimley-Horn and Associates
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EXHIBIT A

Coronado Repower Project Environmental Narrative Report

Salt River Project Agricultural Improvement and Power District

Date: January 12, 2026

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Appendix A A-1

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1. Introduction

Arizona Corporation Commission (ACC) Decision on Case No. 16, Docket No. L-00000B-74-0000-00016 dated January 3, 1975, approved a Certificate of Environmental Compatibility (CEC) for the Coronado Generating Station (CGS) granted by the Arizona Power Plant and Transmission Line Siting Committee.

The approved CEC (CEC 16) authorized the construction and operation of the CGS power plant and associated transmission lines. Salt River Project Agricultural Improvement and Power District (SRP or Applicant) is requesting an amendment to CEC 16 for the proposed Coronado Repower Project (Repower Project), a project to convert the existing coal-fired units to natural gas-fired units.

In support of the application to amend CEC 16, Kimley-Horn conducted an environmental review for the Repower Project. This review consisted of:

- review and summary of prior information submitted for the approved power plant and associated facilities;
- review of new information, including spatial and non-spatial data, related to the construction and operation of the Repower Project; and
- compatibility analysis of the Repower Project with existing and future land uses, scenic and visual resources, biological resources, and cultural resources.

2. Project Overview

Project Description

CGS is an existing coal-fired power plant that supplies power to SRP's service territory and provides capacity during times of high electrical demand. Construction of CGS began in 1975 and commercial operation began when Unit 1 was completed in 1979. Construction of Unit 2 was completed in 1980. Each unit includes a boiler that uses high temperatures, driven by coal combustion, to convert water into steam which then drives turbines to produce electricity. While CEC 16 authorized the construction of three units, SRP did not complete the third unit. The two existing units provide 790 megawatts (MW) of nameplate capacity and 762 MW of net generation capacity.

The Repower Project entails converting the existing CGS coal-fired generating units to burn natural gas instead of coal as the fuel source. The conversion would require construction of a natural gas supply yard, a delivery system to transport natural gas from a fuel supply yard to the boilers, and modifications within the existing boilers at the plant. These modifications include installing new burners and igniters. SRP would continue using other existing plant technologies, including but not limited to, the buildings, boilers, generators, condensers, air pollution control systems, and cooling towers. Equipment no longer needed for operations would be abandoned in place or removed as necessary.

To supply CGS with natural gas, a pipeline lateral and fuel supply yard will be constructed, operated, and maintained by a third-party gas supplier. The Federal Energy Regulatory Commission (FERC) is expected to authorize the facilities owned and operated by the third-party gas supplier, and the associated land or easements for these facilities would be obtained by the third-party gas supplier. This report does not assess impacts associated with infrastructure developed by the third-party gas supplier outside of the CGS main plant site.

Location

CGS is located along U.S. Highway 191, approximately 6 miles northeast of downtown St. Johns, in Apache County (Project Site Figure 1). The Repower Project, which is centered on the CGS main plant site (Figure 2), is located within Section 33 of Township 14 North, Range 29 East, Gila-Salt River Principal Meridian.

Figure 1. Project Vicinity Map

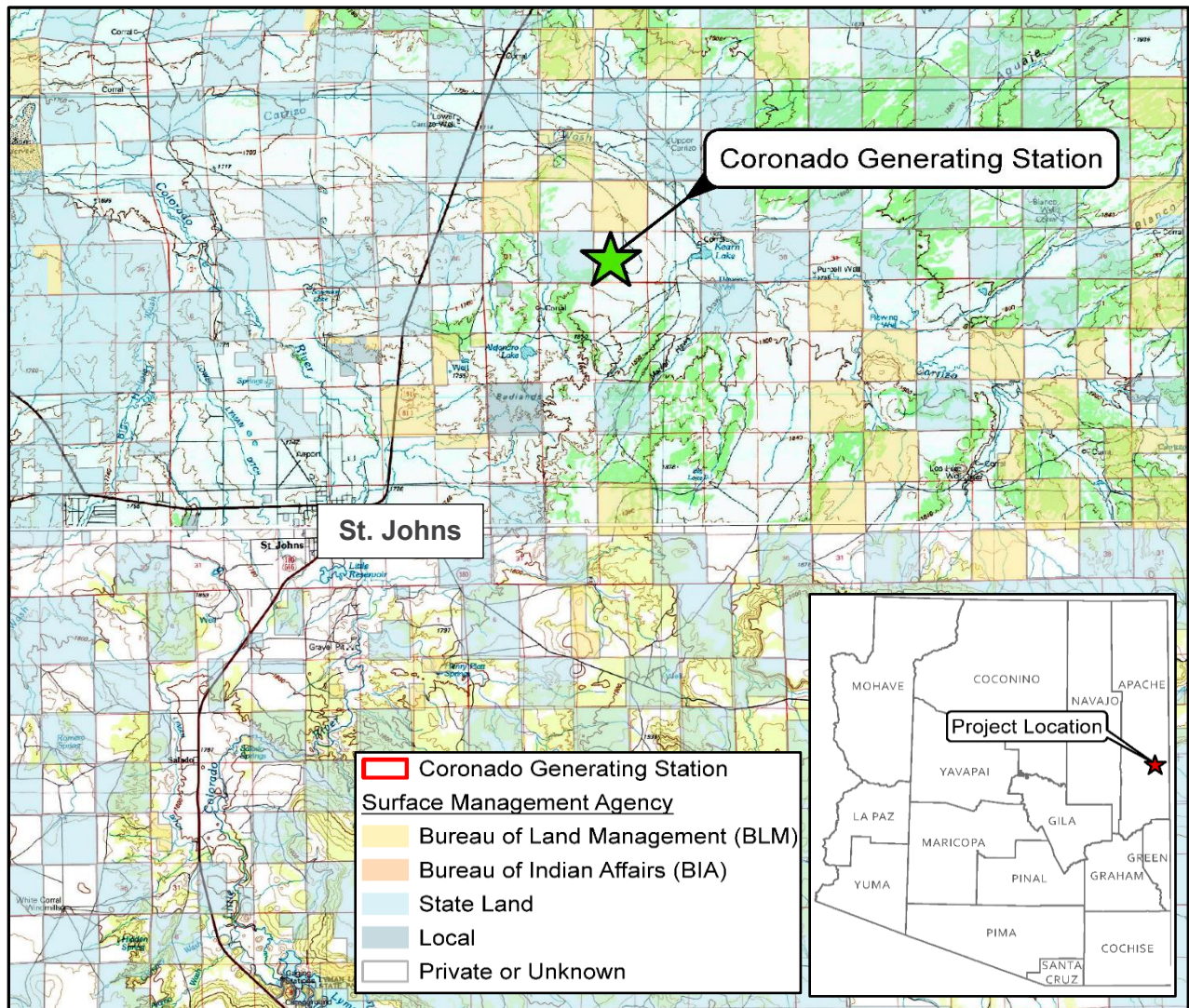
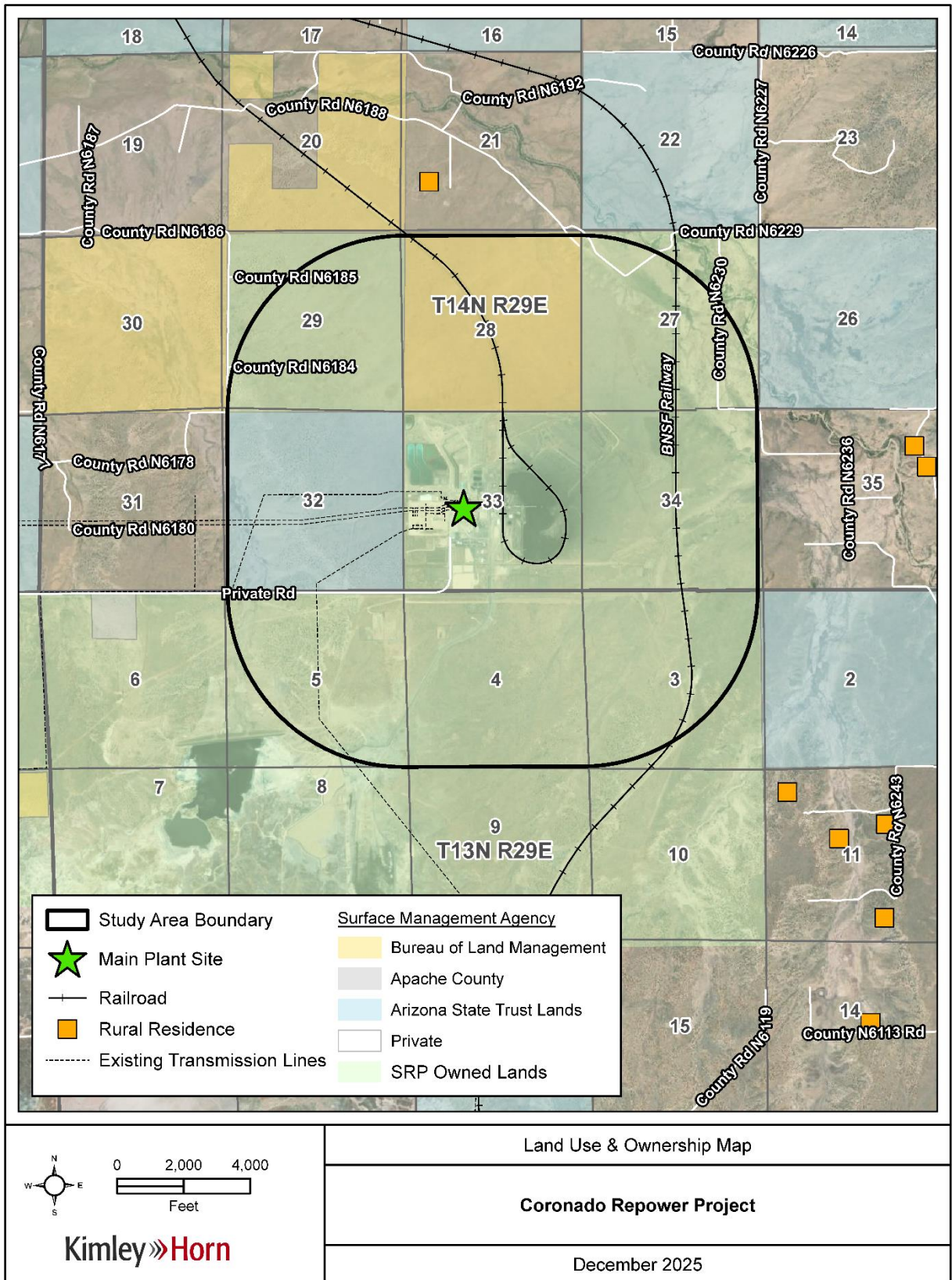


Figure 2. Ownership Map



Summary Table of Facility Information

In support of SRP's application to amend CEC 16, facility information material to the natural gas conversion is provided below:

1. Name and address of the Applicant:

Name: Salt River Project Agricultural Improvement and Power District
Address: PO Box 52025, Phoenix 85072-2025

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

Name: Hayden Fennell
Address: PO Box 52025, Phoenix 85072-2025
Telephone: (602) 236-5387
Fax: (602) 236-3407
Email: hayden.fennell@srpnet.com

3. Description of the proposed facilities:

4.1 With respect to an electric generating plant:

i. Type of generating facilities:

The original CEC certified the construction of steam electric generating units, fueled by coal. SRP's application requests to amend CEC 16 so SRP can fuel the units with natural gas. As part of its request, SRP would fuel the plant with coal until the completion of the Repower Project.

ii. Number and size of proposed units:

CEC 16 authorized the construction of three, 350 MW units with a total capacity of 1,050 MW. Since completion of construction, CGS has constructed and operated two 395 MW units with a total nameplate capacity of 790 MWs. The application to amend seeks authority to convert the two existing coal-fired 395 MW units to two natural gas units. The conversion will not change the nameplate capacity of the units. However, upon completion of the Project and the associated turbine upgrades, CGS is expected to have a net generation capacity of approximately 812MW.

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

To supply CGS with natural gas, a lateral and fuel supply yard would be constructed, operated, and maintained by a third-party gas supplier. The gas lateral and fuel yard would fall under the Federal Energy Regulatory Commission (FERC) jurisdiction, and the associated land or easements would be obtained by the third-party gas supplier. SRP is in early stages of negotiations with natural gas suppliers.

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

Following the conversion of the plant, there will be no material change to the cooling towers or source of water utilized compared to current coal-fired operations.

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

Following the conversion of the plant, there will be no material change to the number of stacks, or stack height, compared to current coal-fired operations.

v. Dates for scheduled conversion and firm operation of each unit and date construction must commence in order to meet schedules:

Unit	Project Construction Start	Commercial Operation Date
1	3 rd Quarter 2029	4 th Quarter 2029
2	3 rd Quarter 2029	4 th Quarter 2029

vi.a Project Operation When converted to natural gas, the plant will be a firm resource that provides capacity during system peaks.

4. Description of the environmental studies the Applicant has performed.

The Applicant contracted with the following consultants to perform environmental studies.

Consultant	Environmental Studies
RTP Environmental Associates, Inc.	Air Quality Modeling Report (See Harbin Declaration, Exhibit A)
Kimley-Horn	Land Use, Scenic and Visual Resources, Cultural Resources, Biological Resources (this Exhibit)

3. Resource Review and Analysis of Impacts

CGS has operated for approximately 45 years as a coal-fired generating station. In this report, the potential for impacts to land use, scenic and visual resources, biological resources, and cultural resources from converting the plant to use natural gas as the fuel source were analyzed and compared to the existing coal-fired operations using a one-mile buffer surrounding the CGS plant site as shown on Figure 2 (Study Area). As detailed below, the Repower Project has negligible impacts to these resources within the Study Area as compared to exiting coal-fired operations.

Impacts from the natural gas conversion to the plant’s air emissions are separately analyzed.

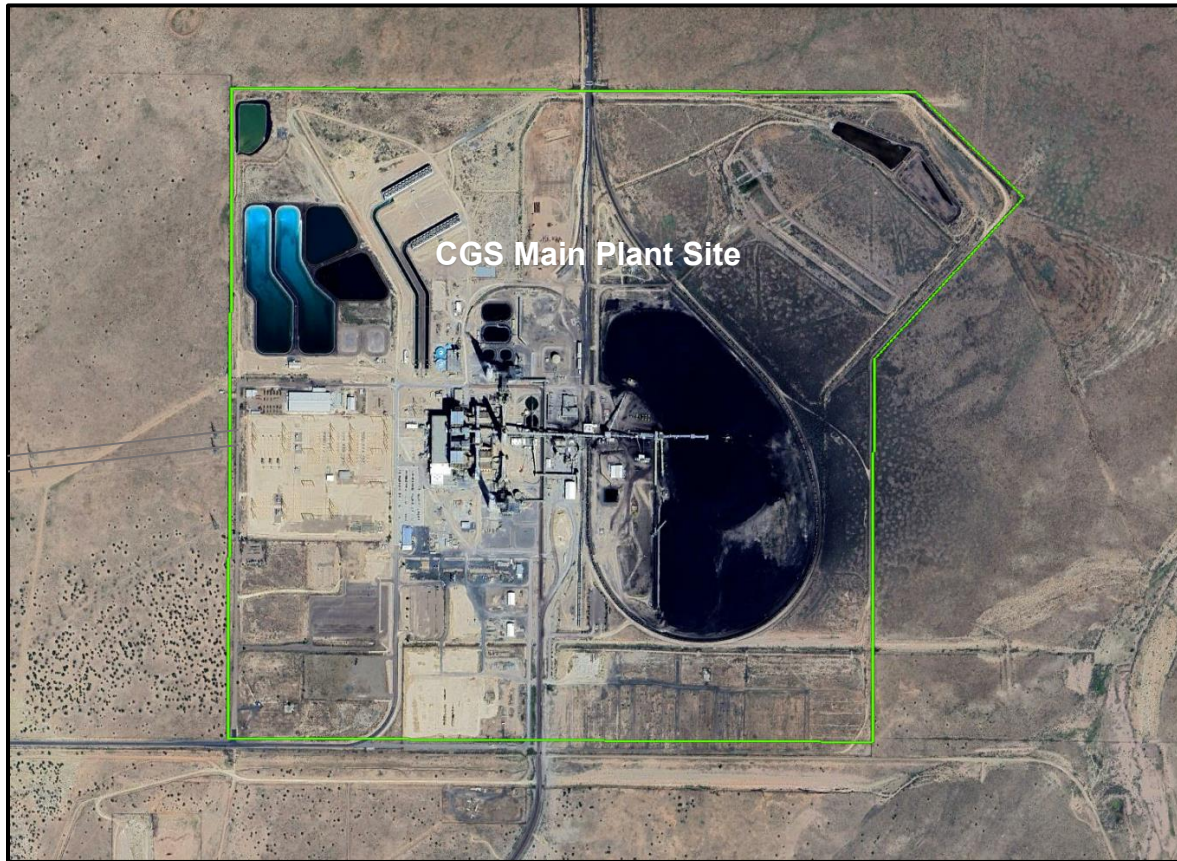
Land Use

Jurisdiction and Land Ownership

Except for the siting and construction of the pipeline needed to supply natural gas to the plant site, modifications needed to convert CGS to natural gas operations will all occur within the main plant site shown on

Figure 3. Specifically, the conversion will consist of construction of a natural gas supply yard within the CGS main plant site, a delivery system to transport natural gas from a supply yard to the boilers, and modifications within the existing boiler systems at the plant. Changes to the existing boiler systems include installing new burners and igniters.

Figure 3. CGS Main Plant Site



Existing Land Use within the Study Area

Existing land uses within the Study Area, shown on Figure 2, include dispersed recreational opportunities (on ASLD land), the existing CGS plant and associated transmission lines, transportation facilities (railroad, plant access road, and unpaved roads), and vacant land. Specific land uses are laid out in detail below.

Recreation- The Arizona State Land Department (ASLD) owns and manages lands adjacent to the CGS property which may be used for recreational hunting of elk, mule deer, or pronghorn antelope. While the Bureau of Land Management (BLM) owns land adjacently north of the CGS main plant site, recreation access is restricted because the area has limited access controlled by railroad easements.

Transportation- Transportation facilities within the Study Area include a mix of local, state, and private roadways as well as the railroad which brings coal to the CGS main plant site.

Utilities- Utility land uses in the Study Area include the existing CGS power plant, associated switchyard, and other buildings of facilities associated with the CGS power plant.

Vacant- A majority of land within the Study Area is vacant, undeveloped land. Most of the vacant land is owned by SRP, however one section is owned by ASLD, and the second section is owned by BLM.

Surrounding Land Use

While there are no residences within the Study Area, dozens of dispersed rural residences are located within a 5-mile radius of the CGS, with the nearest residence located approximately 1.3 miles north of the CGS main plant site.

The nearest city is St. Johns located at the intersection of U.S. Highways 180 and 61/191, 6 miles southwest of the CGS. The incorporated area of St. Johns encompasses approximately 27 square miles, of which only about 20 percent has been developed. Existing development in St. Johns includes residential, commercial, and community facilities.

Apache County Zoning Regulations

Apache County's land-use planning aims to maintain its open, rural character, with specific regulations for development and a focus on managing growth while preserving traditional ranching areas. It also focuses on encouraging community development for its rural communities.

The Apache County Comprehensive Plan (Comprehensive Plan) (Apache County 2019) provides a guide for decisions by the Planning and Zoning Commission and the Board of Supervisors concerning growth and development. It provides an understanding of existing and proposed land use for decision-makers, the public, and developers. According to the Comprehensive Plan, the existing CGS facility is located within an area designated as *Rural Ranch*. The County's stated goal for this designation is ". . . to maintain the open character of land traditionally used for ranching in Apache County" (Apache County 2019:12).

Outreach to Stakeholders

As part of the land use study, the Comprehensive Plan as well as the Apache County interactive web map, were evaluated. Identified land uses and development plans were reviewed and verified with the Apache County Community Development department, which manages planning and zoning applications in Apache County. Representatives from the Arizona legislature, Apache County, and other stakeholders were invited to participate in the Repower Project stakeholder engagement efforts. The purpose of this representation was to ensure consistency with plans and to identify potential issues throughout the environmental and public planning outreach process.

In late November 2025, on behalf of SRP, Kimley-Horn sent letters to state and local government officials listed in

Table **1**, providing information on the Repower Project and requesting new or additional information on plans or planned developments. See Appendix A for a copy of the letter and accompanying map sent to community officials, and letters and emails received in response to the notification letters.

Table 1. List of Community Officials

Contact Name	Title	Jurisdiction/ Agency	Response
Matthew Fish	Community Development Director	Apache County	Yes, to provide comment per direction of Apache County BOS
Preston Raban	Economic Development Director	Apache County	Yes, Support
Travis Johnson	P&Z Commission Member	Apache County	No response to date
Brad Peterson	P&Z Commission Member	Apache County	No response to date
Bob Pollock	P&Z Commission Member	Apache County	No response to date
Michael Bragiel	P&Z Commission Member	Apache County	No response to date
Carey Dobson	P&Z Commission Member	Apache County	No response to date
Bobby Fite	P&Z Commission Member	Apache County	No response to date
Brad Jarvis	P&Z Commission Member	Apache County	No response to date
Kay Hauser	P&Z Commission Member	Apache County	No response to date
Dan Muth, Chairman	P&Z Commission Member	Apache County	No response to date
Nelson Davis	Board Member - District III	Apache County	No response to date
Alton Joe Shepherd	Board Member - District II	Apache County	No response to date
Dr. Joe Shirley, Jr.	Board Member - District I	Apache County	No response to date
Ryan Patterson	County Manager	Apache County	No response to date
Chris Chiesl	Community Development Director	St. Johns	No response to date
Paul Ramsey	City Manager	St. Johns	No response to date
Cindy Lee Richins	City Clerk	St. Johns	No response to date
Spence Udall	Mayor	St. Johns	Yes, Support
Jill Patterson	Vice Mayor	St. Johns	Yes, Support
Tony Raykovitz	Councilman	St. Johns	Yes, Support
Nathan Wengert	Councilman	St. Johns	Yes, Support
Joe Greene	Councilman	St. Johns	Yes, Support
Mandi Huth	Councilwoman	St. Johns	Yes, Support
Brad Jarvis	Councilman	St. Johns	Yes, Support
Kelsi Miller	Town Clerk	Springerville	Yes, forwarded to Mayor and Council
Ted Soltis	Town Manager	Springerville	Yes, Support
Richard Davis	Mayor	Springerville	No response to date
Doug Henderson	Vice Mayor	Springerville	No response to date
Florencio Lozoya	Council Member	Springerville	No response to date
Stormy Palmer	Planning and Zoning Director	Springerville	Yes, forwarded to the zoning commission
Terry Shove	P&Z Commission Chairperson	Springerville	No response to date
Tony Contreras	P&Z Commission	Springerville	No response to date

Contact Name	Title	Jurisdiction/ Agency	Response
Bill Lucas	P&Z Commission	Springerville	No response to date
Daniel Chavez	P&Z Commission	Springerville	No response to date
Steve Huggenberger	P&Z Commission	Springerville	No response to date
Jessica Vaughan	Town Clerk	Eagar	Yes, forwarded to Mayor and Council
Guy Phelps	Mayor	Eagar	Yes, Support
Marsha Tucker	Vice-Mayor	Eagar	Yes, Support
Brandon Slade	Councilman	Eagar	Yes, Support
Bryce Burnham	Councilman	Eagar	Yes, Support
Ray Hamblin	Councilman	Eagar	Yes, Support
William Greenwood	Councilman	Eagar	Yes, Support
Titan Merrill	Councilman	Eagar	Yes, Support
Britney Reynolds	Community Development Director	Eagar	Yes, forwarded to Mayor and Council
Chelsea Slade	P&Z Commission Member	Eagar	No response to date
Becky Crosby	P&Z Commission Member	Eagar	No response to date
JoElla Younkin	P&Z Commission Member	Eagar	No response to date
Kristi Pendrod	P&Z Commission Member	Eagar	No response to date
Brenda Ciminski	P&Z Commission Member	Eagar	No response to date
Debra Seeley	P&Z Commission Member	Eagar	No response to date
Brannon Eagar	P&Z Commission Member	Eagar	No response to date
Mae Peshlakai	Representative	AZ House of Reps	No response to date
Myron Tsosie	Representative	AZ House of Reps	No response to date
Teresa Hatathile	Senator	AZ Senate	No response to date
Ginger Ritter	Project Evaluation Program Supervisor	Arizona Game and Fish Department	Yes, recommended future coordination with AZGFD for natural gas pipeline lateral*

Note: The future natural gas pipeline will be permitted and developed by a third-party gas supplier.

Land Use Conclusion

The Repower Project will be constructed within the existing footprint of the CGS main plant site, an established industrial area, on private property, used for ongoing electric generation, where no plans for conflicting development exist. The Repower Project is compatible with existing and planned land uses. Land use impacts from the Repower Project will be negligible.

Scenic and Visual Resources

Scenic Areas Analysis Approach

The purpose of the scenic areas analysis is to identify and characterize the level of visual modification in the landscape that would result from the conversion of CGS to natural gas. Modification of the landscape is described in levels of visual contrast, which can potentially affect both landscape scenery (i.e., scenic quality) and sensitive viewers.

Visual Character of Project

The project description, purpose and need statements, public involvement documents, and other studies were reviewed for a general understanding of the visual character of the Repower Project and its basic design features.

Viewer Sensitive

Sensitive viewers are defined as individuals who may observe the Project and have concerns regarding possible alterations to their surrounding visual environment. Regarding sensitive viewers, viewer exposure is dependent on several factors, including viewing distance, extent, and duration.

Residential and recreational viewer groups are typically considered to have high sensitivity to visual changes in the landscape, while viewers moving along travel routes are considered to have low to moderate sensitivities to visual changes (unless traveling along a designated scenic travel route or more natural appearing areas).

Visual Contrast

The methodology used to evaluate the visual impacts of the Repower Project focus on the level of visual modification in the landscape that would result from the conversion of the existing power plant. Modification of the landscape is typically described in terms of the degree of visual contrast, which can potentially affect both scenic quality and sensitive viewers. While scenic quality refers to the general characteristics and inherent aesthetic value of the landscape as a resource regardless of specific viewers, the term sensitive viewers refer to specific viewers and/or groups of viewers whose views could be affected by potential changes to the landscape.

Impacts to both scenic quality and sensitive viewers are determined, in part, by evaluating the visual contrast the proposed facilities would have with the existing landscape. Visual contrast refers to the degree that proposed project features would either match/repeat existing features in the landscape or contrast with features of the existing landscape. The degree of visual contrast considers the existing landforms, vegetation, and built features present in the landscape and is

described in terms of the degree of perceptible change in the basic design elements of form, line, color, and texture that would be evident by the introduction of the Repower Project in the landscape.

The impact thresholds for this assessment are categorized as follows:

- High: Project features would result in a strong degree of contrast and would appear as dominant features within the existing landscape.
- Moderate: Project features would result in a moderate degree of contrast and would appear as codominant features within the existing landscape.
- Low: Project features would result in a weak degree of contrast and would be subordinate to the features of the existing landscape.

Setting

No scenic resources were identified within the Study Area. Dispersed residence, residential neighborhoods, parks, other community areas, and travel routes are typically considered to be of high sensitivity. The nearest residence is located approximately 1.3 miles north of the CGS main plant site. CGS is a major industrial feature which can be seen from select locations throughout St. Johns, along US Highway 191, and ASLD lands, and areas surrounding the main plant site that are used for recreation purposes. Open desert terrain east of St. Johns provides wide horizons where CGS's exhaust stacks stand out against the sky.

Dominant visual elements of CGS include:

- Three tall, cylindrical exhaust stacks, pale in color, which rise prominently above the plant.
- Two boxy steel-clad buildings which house the generating units in muted tones.
- Angular, mechanical, coal handling equipment conveyors and associated structures.

Figure 4 represents a view of CGS from the north. The open desert allows for view to the existing facilities of the administration building, which is approximately 60 feet in height. The administration building appears relatively low profile and unobtrusive at this distance, while the 500 feet tall stacks and associated plumes attract more attention.

Figure 4. View of Existing Facility from 0.75 miles to the North



Note: See Figure 7 and Figure 8. Facilities as tall as 60 feet appear relatively low profile from this distance.

Figure 5 represents a view of CGS from dispersed residences located to the east and southeast of the existing main plant site, where local terrain screens all but the tip of the 500 foot tall stack. **Error! Reference source not found.** Figure 6 illustrates views from US Highway 191 and the entrance road to CGS, in which, again the 500 feet tall stacks and associated plumes attract attention, while the lower profile elements are relatively indistinguishable.

Figure 5. View of Existing Facility from 1 mile to the East



Note: Only the tip of the 500-foot-tall stack and plumes are visible from this vantage point.

Figure 6. View of Existing Facility from 3.3 miles to the West



Note: See Figure 7 and Figure 8 illustrating scale of existing elements associated with CGS. Facilities as tall as 200 feet are indiscernible from this distance.

Figure 7. Illustration & Scale of Existing CGS Facilities



Figure 8. Photo & Scale of Existing CGS Facilities



Scenic Area Conclusion

The modifications required for conversion of plant equipment to utilize natural gas will occur within the existing footprint of the CGS main plant site and will be viewed in context of this existing industrial complex (see Figure 7 and Figure 8). The major modifications involve replacing burners within boilers which are located within an existing building and the construction of a new natural gas fuel yard and delivery system within the existing plant site. While replacement of burners would not be visible, the addition of a fuel supply yard and associated infrastructure to bring natural gas to the boilers would add new visual elements to CGS. Fuel yards vary in size and configuration but may cover several acres; they are cleared of vegetation, graded, and typically surfaced with gravel. Typically fuel yards are enclosed within perimeter fencing and include a variety of low profile, metal structures, pipes and storage equipment and may be punctuated by control buildings, light poles, and vent stacks. Overall, fuel yards present a visually complex and “industrial” appearance. Due to the scale of the fuel yard and location within the CGS main plant site these additions are not anticipated to attract attention from surrounding viewpoints.

The proposed facilities would be compatible with the form, line, surface colors, and textures of existing structures, would be much smaller in scale relative to existing objects in view, and would appear visually subordinate to the features of the existing landscape.

Cultural Resources

Prior Cultural Resources Information

Construction activities for the CGS commenced in 1975, resulting in substantial disturbance of all land within the boundaries of the main plant site. In addition to the construction of the power plant’s facilities, extensive site preparation and grading to establish proper drainage patterns and

accommodate the installation of an evaporation pond, wastewater ponds, and detention ponds, resulted in substantial disturbance of all land within the boundaries of the main plant site. The facility achieved operational status in 1979 and has remained in continuous service since that time.

A records search identified sixteen previous cultural resource surveys conducted within a 1-mile radius of the CGS main plant site, one of which was conducted in 1974 and covered 100 percent of the main plant site. This survey identified a few sites in the vicinity of the CGS, none of which were identified within the main plant site.

Current Cultural Resources Information

A Class III Cultural Resources survey of 253 acres of undeveloped lands within the main plant site was performed December 18 through December 20, 2025. The survey identified four isolated occurrences, which consisted of three flaked stone artifacts and one prehistoric ceramic sherd. None of these isolated occurrences are considered eligible for listing in the National Register of Historic Places. See Appendix B for the Class III Cultural Resources study. Certain pages of the study have been redacted due to the confidential nature. Unredacted pages of this report will be provided to ACC Staff upon execution of a protective agreement.

Cultural Resources Analysis and Conclusion

The Repower Project will have no effect on cultural resources.

Biological Resources

The Repower Project will have no effect on biological resources given that the natural gas conversion will occur within the boundaries of the main plant site – an already disturbed industrial site used for power generation. Nonetheless, biological resources were analyzed as described below.

Biological Resources Information

The Study Area is within the Plains Grassland biotic community and the Great Basin Conifer Woodland subdivision (Brown 1994). The list of special status species considered in the biological resources analysis was developed from the following sources: (1) federally listed, proposed, and candidate species provided by the United States Fish and Wildlife Service (USFWS), (2) a list of sensitive species provided by the Arizona Game and Fish Department (AZGFD) Heritage Data Management System, and (3) the Native Plant Law (enforced by the Arizona Department of Agriculture). The potential for the occurrence of special status species in the Study Area was evaluated based on (1) existing publicly available data, (2) qualitative comparisons between known habitat requirements for each species and biotic and abiotic conditions found within the Study Area, and (3) experiences from similar evaluations conducted by Kimley-Horn biologists.

The USFWS Information for Planning and Consultation (IPaC) identified four federally listed species that may have the potential to occur within the Study Area (Table 2). The IPaC did not

list any critical habitats, National Wildlife Refuge Lands, or fish hatcheries in the Study Area, but it did identify possible freshwater pond and lake wetlands within CGS (USFWS 2025). These potential wetland areas are identified on National Wetlands Inventory maps but do not provide suitable habitat for special-status species. See Appendix C for the IPaC and AZGFD Environmental Review Tool (ERT) reports.

Table 2. Special Status Species with the Potential to Occur within the Study Area

Species	Status	Habitat Requirements	Habitat Suitability
Mammals			
Pale Townsend's big-eared bat <i>Corynorhinus townsendii pallescens</i>	SGCN-1	In Arizona, summer day roosts are found in caves and mines from desertscrub up to woodlands and coniferous forests. Night roosts may occur in abandoned buildings.	There are no suitable roosts within the Study Area. Pale Townsend's big-eared bats may be observed foraging within the Study Area; however, due to availability of suitable habitat outside the CGS facility, the Repower Project will not lead to declines in foraging habitat or populations.
Gunnison's prairie dog <i>Cynomys gunnisoni</i>	SGCN-1	In communal burrows in desert grasslands, short and midgrass prairies, meadows, and scrublands, at an altitude of 6,000 to 10,000.	No suitable habitat occurs within the Study Area. The species is known to inhabit eastern Arizona; however, the habitat within the Study Area does not support prairie dogs due to the presence of juniper which acts as a deterrent for the species.
Birds			
Yellow-billed cuckoo <i>Coccyzus americanus</i>	ESA-LT	This bird utilizes large contiguous patches of multi layered riparian habitat, such as cottonwood-willow gallery forests along rivers and streams below 6600 feet.	No suitable habitat occurs within Study Area. While water is present at the site, the manmade stormwater, sewer treatment, and cooling ponds do not provide the necessary riparian habitat to support yellow-billed cuckoos.
American peregrine falcon <i>Falco peregrinus anatum</i>	SGCN-1	Steep, sheer cliffs overlooking woodlands, riparian areas, or other habitats supporting avian prey species in abundance.	The Study Area is outside the known range of this species.

Species	Status	Habitat Requirements	Habitat Suitability
Western burrowing owl <i>Athene cunicularia hypugaea</i>	SGCN-2	Open, well-drained grasslands, steppes, deserts, prairies, and agricultural lands, often associated with burrowing mammals.	Sufficient native habitat does not occur within the Study Area that would be suitable for burrowing or foraging.
Golden eagle <i>Aquila chrysaetos</i>	BGEPA	Open and barren areas, in prairies and wooded areas, especially in hilly in mountainous regions. Nesting on rock ledges, cliffs, or in large trees.	No suitable nesting habitat occurs within the Study Area. There is suitable foraging habitat within the Study Area but not within the main plant site. Golden eagles may be observed foraging within the Study Area; however, due to availability of suitable habitat outside the CGS facility, the Repower Project will not lead to declines in golden eagle foraging habitat or populations.
Amphibians			
Northern leopard frog <i>Rana pipiens</i>	SGCN-1	Grasslands, brushlands, woodlands, and forests ranging from high into mountains usually in permanent water with rooted aquatic vegetation. Frequents ponds, canals, marshes, springs, streams, stock tanks, and borrow pits.	No suitable habitat occurs within the Study Area. While water is present at the site, the manmade ponds do not provide the appropriate riparian habitat.
Lowland leopard frog <i>Rana yavapaiensis</i>	SGCN-1	Desert grasslands to pinyon-juniper in a variety of natural and manmade aquatic systems including rivers, streams, pools, ponds, cinegas, springs, cattle tanks, livestock drinkers, and wells.	No suitable habitat occurs within the Study Area. While water is present at the site the manmade ponds do not provide the appropriate riparian habitat.
Fishes			
Little Colorado spinedace <i>Lepidomeda vittata</i>	ESA-T	Slow to moderate water currents, over fine gravel bottoms. Avoids deep, heavily shaded pools and shallow open areas. Prefers unshaded pools with rocks or undercut banks for cover.	No suitable habitat occurs within Study Area. While water is present at the site the manmade ponds do not provide the appropriate riparian habitat.

Species	Status	Habitat Requirements	Habitat Suitability
Insects			
Monarch butterfly <i>Danaus plexippus</i>	ESA-PT	Breeding and migratory monarch butterfly populations occur throughout Arizona habitats include riparian areas, native desert habitats, and urban habitats concentrated on parks. An abundance of milkweed is critical for this species. Additional plant species monarchs are known to utilize include dogbane alfalfa thistles seep willow sunflowers groundsel and cloves.	Although the manmade ponds within the facility could provide necessary water during the summer months, suitable plant species most associated with the monarch butterfly are not likely to occur in abundance in the Study Area. Therefore, the monarch butterfly has the potential to forage within the Study Area, but due to the availability of suitable habitat outside of the CGS facility, the Repower Project will not lead to declines in the species.
Suckley's cuckoo bumble bee <i>Bombus suckleyi</i>	ESA-PE	Requires suitable nesting sites for host colonies, nectar and pollen resources during the colony and rearing period. primarily underground cavities that have been created naturally or by other animals such as abandoned rodent nests.	Although the manmade ponds within the facility could provide necessary water during the summer months, suitable plant species most associated with Suckley's Cuckoo bumble bee are not likely to occur in abundance within the Study Area. Therefore, Suckley's cuckoo bumble bee has the potential to forage within the Study Area, but due to the availability of suitable habitat outside of the CGS facility, the Repower Project will not lead to declines in the species.

Status: ESA-E = Endangered Species Act Endangered; ESA-T = Threatened; ESA-PE = Proposed Endangered; ESA-PT = Proposed Threatened; BGEPA = Bald and Golden Eagle Protection Act; SGCN-1/2 = AZGFD Species of Greatest Conservation Need.

Analysis

Landcover in the Study Area is comprised of existing industrial power plants surrounded by open desert. Vegetation in the Study Area is dominated by desert scrub and desert grassland plants, characterized by grasses, succulents, and scattered shrubs. For the past 150 years human activities have influenced the St. Johns area resulting in considerable changes in ecology. The broad expanse of grass that once covered most of Apache County has deteriorated under heavy grazing pressure and become overrun with snakeweed and rabbitbrush. The decrease of range fires due to modern controls and the lack of dry grass fuel has allowed a steady invasion of juniper into the grasslands.

Since the majority of the CGS main plant site is developed, it does not constitute suitable habitat for wildlife. There are approximately 120 acres of degraded desert habitat within the main plant site that could be utilized by migratory birds, bats, and insects. Even if some of the minimally suitable habitat within the main plant site is removed as a result of the Repower Project, undisturbed areas are available in the open desert areas surrounding the main plant site that provide more suitable habitats for these species to utilize.

Biological Conclusion

The Repower Project would occur on pre-disturbed lands of the CGS main plant site that provide minimal habitat for special status species. Special status species would not experience long-term detrimental impacts related to the loss or alteration of vegetative cover within the CGS main plant site based on a lack of suitable habitat in areas within the existing facilities. The Repower Project would not contribute to a loss of native vegetation that would result in declines in any native plant or wildlife species. Because of the industrialized use of the area and low-value habitat, the Repower Project is not expected to materially impact biological resources.

4. Summary of Environmental Conclusions

In conclusion, the Repower Project would have no major environmental impacts. The Repower Project would not remove suitable habitat or impact special status species. The Repower Project would be compatible with the form, line, surface colors, and textures of existing structures and is not anticipated to attract attention or result in visual contrast. There are no designated scenic resources within the Study Area, therefore, no impacts are anticipated. The Repower Project will have no effect on cultural resources.

The Repower Project is environmentally compatible with existing and future land uses and any environmental resource impacts are negligible.

5. References

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https://www.apachecountyaz.gov/accnt_591117/site_591118/Documents/Comprehensive-Plan-Final-June-2019.pdf. Accessed December 2024.
- Apache County. 2019. Zoning Ordinance of Apache County. Available at:
https://www.apachecountyaz.gov/accnt_591117/site_591118/Documents/Apache-County-Zoning-Ordinance-amended.pdf. Accessed December 2024.
- Baker, Jeffrey. 2025. A Class III Cultural Resource Survey of 254 Acres within the Salt River Project Coronado Generating Station, St. Johns, Apache County, Arizona.
- Bradford, James. 1980. The Coronado Project Archaeological Investigations: The Coronado Generating Station Plant Site and Access Road.
- EORT from Arizona Game and Fish Department's Heritage Data Management System (HDMS) and Project Evaluation Program (PEP) accessed online ([Home](#) | [Arizona Environmental Review Tool](#))
- IPAC: Information for Planning and Consultation. IPaC: Home, United States Fish and Wildlife Service, <http://ecos.fws.gov/ipac/>.
- Keller, D.R. and D. Spalding. 1983 Site Card for Site AZ Q:7:54(ASM). Document on file with the Arizona State Museum, Tucson.
- National Wetlands Inventory - Surface Waters and Wetlands. United States Fish and Wildlife Service, National Wetlands Inventory, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

Appendix A

Notification Letter Sent to State and Local Government Officials & Responses

Figure 9. Example Notification Letter

November 22, 2025

Preston Raban
Economic Development Director
75 W. Cleveland
PO Box 238
St Johns, AZ 85936

Subject: SRP's Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station

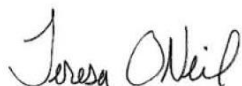
Dear Director Raban:

Salt River Project Agricultural Improvement and Power District (SRP) plans to apply to the Arizona Corporation Commission (ACC) for an amendment to the Certificate of Environmental Compatibility (CEC) for Case No. 16 to convert the Coronado Generating Station (CGS) facility to burn natural gas instead of coal as its fuel source. CGS's capacity plays an integral role in meeting the peak energy demand for the greater Phoenix metropolitan area, which is expected to increase 50% by 2035. The proposed project would allow for grid flexibility and provide a bridge to the mid-2040s, when other generating technology in development may be available for implementation at the CGS site. SRP expects to submit an application to the ACC in January 2026.

Your organization is invited to provide information or written comment regarding development plans in the vicinity of CGS, which is located along U.S. Highway 191, approximately 6 miles northeast of downtown St. Johns, in Apache County (See attachment).

To allow your information to be included in SRP's Application to Amend CEC No. 16 please forward your written comments to me by Friday, December 19, 2025, via email at Teresa.Oneil@Kimley-Horn.com or physical mail at 2046 Riverview Auto Drive, Suite 400, Mesa, AZ 85201. Additional project information, including the times and locations of public meetings, can be found on the project website at srp.net/Coronado-generating-station.

Sincerely,



Teresa O'Neil
Environmental Planner
Kimley-Horn

CC: Hayden Fennell, SRP

Enclosure

Figure 10. Map Accompanying Notification Letter

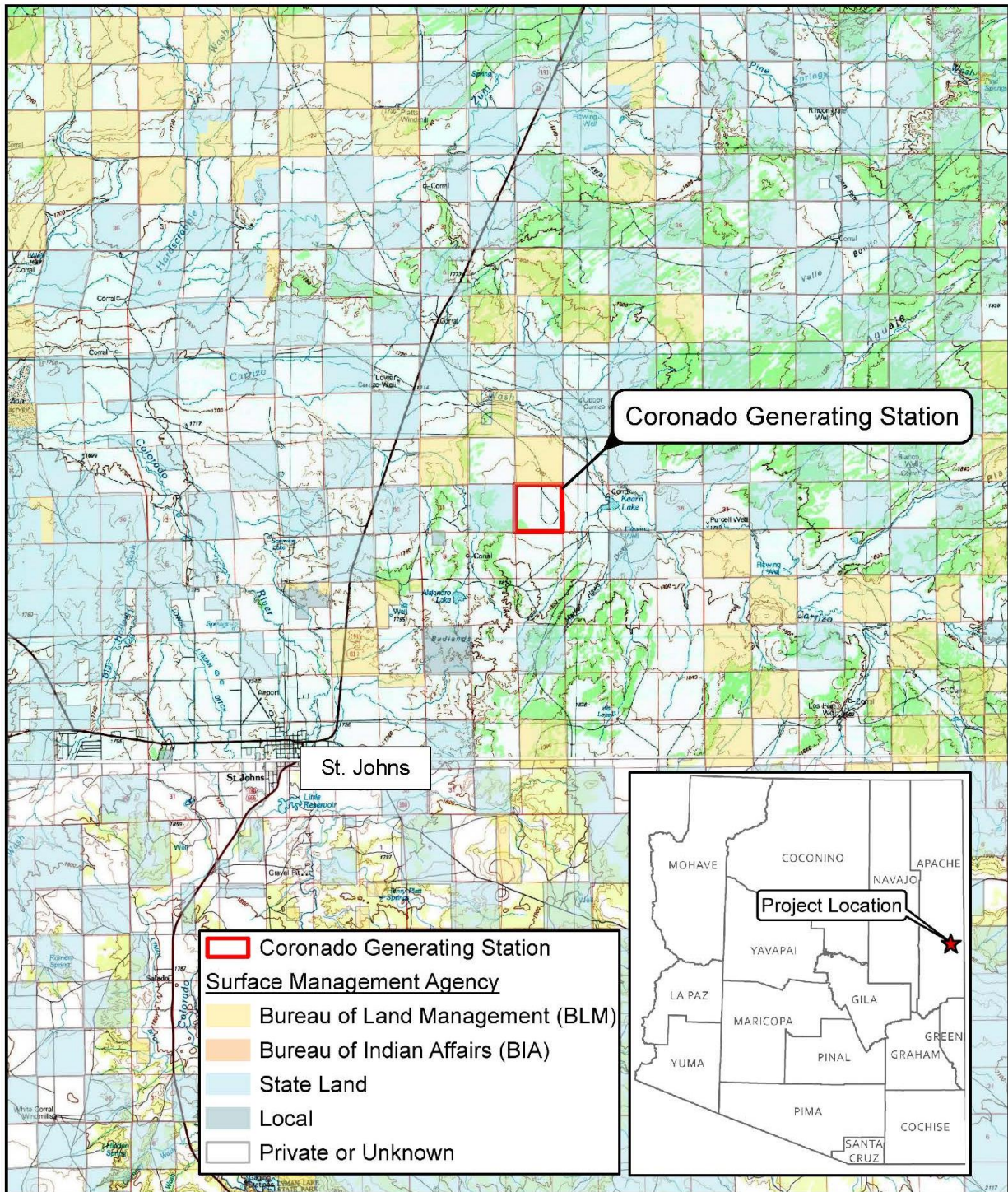


Figure 11. Response from St. Johns Mayor, Vice-Mayor, and Town Council



P.O. Box 455 • St. Johns, Arizona 85936 • (928) 337-4517 • fax (928) 337-2195 • www.sjaz.us

December 16, 2025

Salt River Project Agricultural Improvement and Power District
2046 Riverview Auto Drive, Suite 400
Mesa AZ, 85201

RE: SRP's Application to amend Arizona Corporation Commission Certificate of Environmental Compatibility Case N. 16, Coronado Generating Station

To Whom It May Concern,

The City of St. Johns and the St. Johns City Council express our strong support for the conversion of the Coronado Generating Station from coal to natural gas.

Coronado Generating Station has been a cornerstone of our community for decades. This conversion is a responsible and forward-looking action that helps preserve high-quality local jobs, sustains the tax base that supports essential city services, and keeps the facility operating with a skilled local workforce.

The City and Council view this project as a practical transition that balances reliability, environmental improvement, and economic stability. It allows Coronado to continue providing dependable power while adapting to current energy standards without abandoning the community that has supported the plant for generations.

In addition, the natural gas pipeline associated with this conversion offers future opportunities for the City of St. Johns. Expanded access to natural gas could support economic development, attract new businesses, and provide additional options for residential and commercial growth over time.

The City of St. Johns and the St. Johns City Council strongly support this conversion and believe it serves the long-term interests of our community, our workforce, and the region.

Sincerely,

Mayor Spence Udall

Vice Mayor Jill Patterson

Tony Raykovitz

Joe Greene

Mandi Huth

Brad Jarvis

Nathan Wengert

"The City of St. Johns is an Equal Opportunity Employer and Provider."

Figure 12. Response from Eagar Mayor, Vice-Mayor, and Town Council



December 2, 2025

Salt River Project Agricultural Improvement and Power District
2046 Riverview Auto Drive, Suite 400
Mesa, AZ. 85201

RE: SRP's Application to Amend Arizona Corporation Commission Certificate of
Environmental Compatibility Case No. 16, Coronado Generating Station

To Whom It May Concern,

The Town of Eagar wishes to express our strong support for the conversion at the Coronado Generating Station facility to burn natural gas. We feel this conversion will allow continued stable electricity for the great State of Arizona as we grow as a hub for data centers and many other industries. As we all progress, the Town of Eagar wishes to be able to support industry which will bring stable, family supporting jobs and attract other businesses, industry and tourism to our community. We appreciate the working relationship that has been forged between the Town and SRP and hope to continue to refine it moving forward.

Sincerely,

Mayor Guy Phelps

Titan Merrill

Vice Mayor Marsha Tucker

Bryce Burnham

Ray Hamblin

Brandon Slade

William Greenwood

Where Roads Hit the Trails

P.O. Box 1300 * 22W 2nd Street * Eagar, AZ 85925 *
928-333-4128 * eagaraz.gov

Figure 13. Response from Springerville Town Manager



418 E. Main Street, Springerville, AZ 85938 • Phone (928)333-2656

November 25, 2025

Salt River Project Agricultural Improvement and Power District (SRP)
2046 Riverview Auto Drive, Suite 400
Mesa, AZ 85201

RE: SRP's Application to Amend the Arizona Corporation Commission Certificate of Environmental
Compatibility Case No. 16, Coronado Generating Station

Dear Teresa O'Neil:

I am writing to express my strong support for converting the Coronado Generating Station (CGS) facility to burn natural gas. The conversion will allow CGS not only to continue to provide a reliable source of electricity for the area but will also provide jobs for our residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Soltis", is written over a horizontal line.

Ted Soltis
Springerville Interim Town Manager

Via Email: Teresa.Oneil@kimley-Horn.com

Figure 14. Response from Apache County's Community Development Director



Figure 15. 2nd Response from Apache County's Economic Development Director

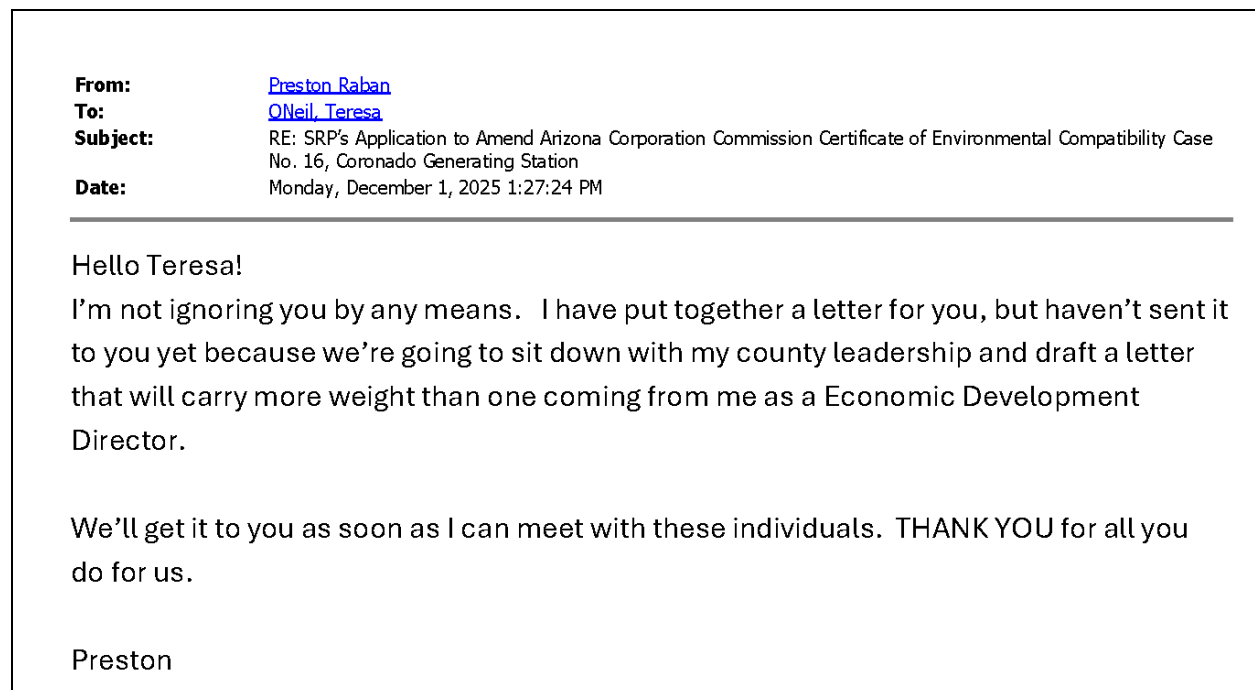


Figure 16. 1st Response from Apache County's Economic Development Director

From: [Preston Raban](#)
To: [O'Neil, Teresa](#)
Subject: RE: SRP's Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station
Date: Monday, November 24, 2025 11:56:20 AM

Absolutely... Hang tight Teresa, and we'll put something together for you. Thanks for giving us the opportunity to give our \$.02 worth... we're you biggest fans!

Preston

Figure 17. Response from Eagar Town Clerk

From: [Jessica Vaughan](#)
To: [O'Neil, Teresa](#)
Cc: [Hayden Fennell](#)
Subject: Re: SRP's Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station
Date: Monday, November 24, 2025 1:41:52 PM

Hello Ms. O'Neil,

Thank you for getting this to me, I will get it out to my Mayor and Council.

Jessica Vaughan, MMC, CPM

Town Clerk / Event Coordinator

22 W 2nd Ave / P.O. Box 1300

Eagar, AZ 85925

*928-333-4128 * 231*



Figure 18. Response from Eagar Community Development Director



Figure 19. Response from Springerville Town Clerk

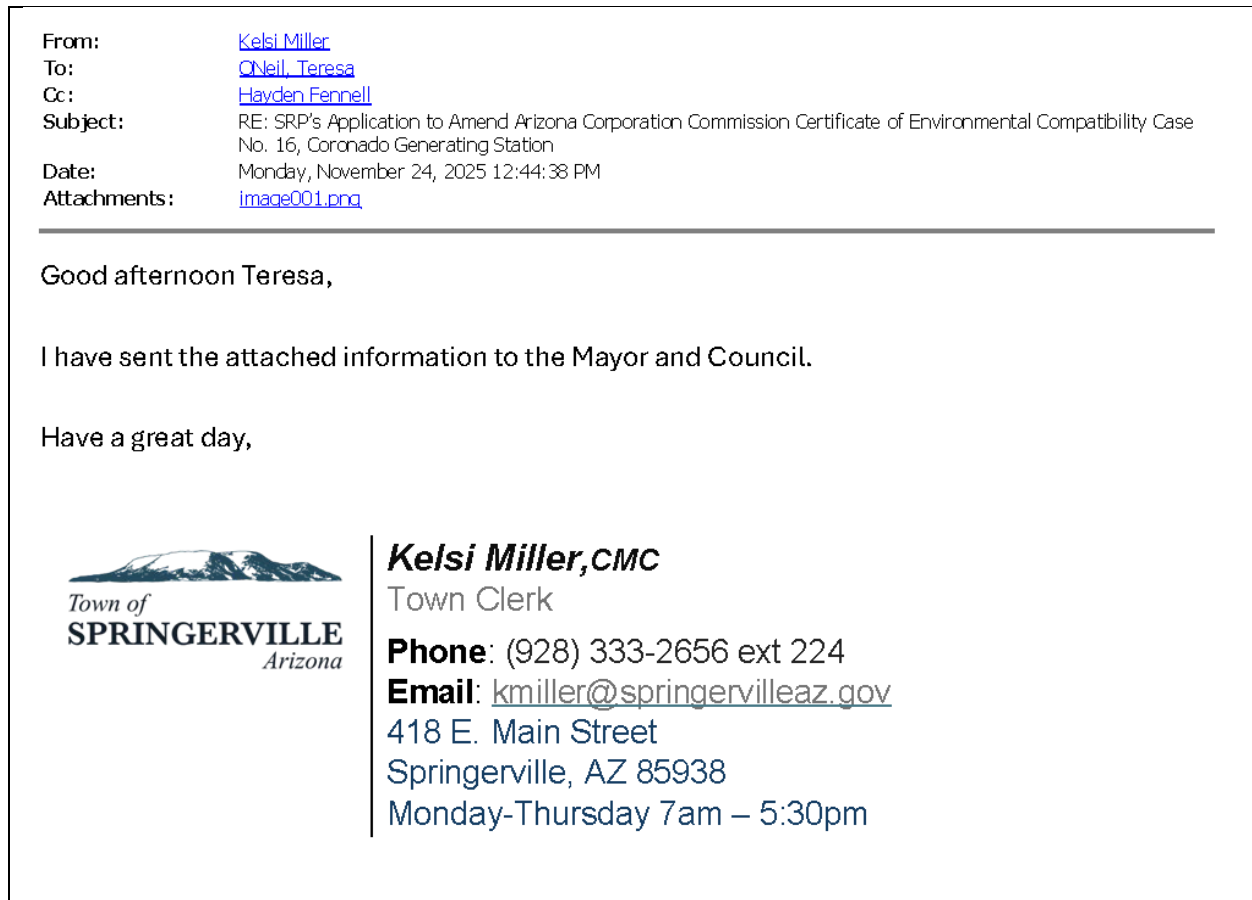


Figure 20. Response from the Arizona Game and Fish Department



December 19, 2025

Ms. Teresa O'Neil
Senior Environmental Planner
Kimley-Horn
1001 West Southern Avenue, Suite 131
Mesa, AZ 85210

Electronically submitted to: Teresa.ONeil@Kimley-Horn.com

RE: SRP's Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station

Dear Ms. O'Neil:

The Arizona Game and Fish Department (Department) understands that the Salt River Project Agricultural Improvement and Power District (SRP) plans to apply to the Arizona Corporation Commission for an amendment to the Certificate of Environmental Compatibility for Case No. 16 to convert the Coronado Generating Station facility, located approximately 6 miles northeast of downtown St. Johns, in Apache County, to burn natural gas instead of coal as its fuel source.

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

The Department recognizes the importance of planning efforts to develop energy infrastructure that contributes to regional and state economic growth needs and would like to work closely with Kimley-Horn and the SRP during the planning and development of this project. The Department recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and wildlife-related recreational access during development and operation of the facilities.

If SRP proceeds with the construction of a natural gas pipeline, the Department would appreciate an opportunity to review construction plans when available. Following that review, the Department would welcome the opportunity to meet and discuss the plans and provide recommendations based on the agency's special expertise related to wildlife, their habitats, and wildlife-related recreation.

Response from the Arizona Game and Fish Department (Continued)

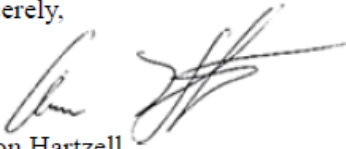
AZGFD – SRP’s Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station

December 19, 2025

Page 2

Thank you for the opportunity to provide input on the SRP’s Application to Amend Arizona Corporation Commission Certificate of Environmental Compatibility Case No. 16, Coronado Generating Station. For further coordination, please contact Elizabeth Johnston at ejohnston@azgfd.gov or 928-532-3683.

Sincerely,



Aaron Hartzell
Regional Supervisor, Region I

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

AZGFD #M25-12015725

**Appendix B
Class III Cultural Resources Survey Report**



CHRONICLE™
HERITAGE

Class III Cultural Resources Survey of 253.2 Acres of Salt River Project Land in Support of the Coronado Generating Station, Apache County, Arizona

Sophie Husslein, B.A., RPA

January 9, 2026



Section 1. Report Title

- 1a. Report Title:** Class III Cultural Resources Survey of 253.2 Acres of Salt River Project Land in Support of the Coronado Generating Station, Apache County, Arizona
- 1b. Report Author(s):** Sophie Husslein, B.A., RA
- 1c. Date:** January 9, 2026
- 1d. Report No.:** 25-504

Section 2. Project Registration/Permits

- 2a. ASM Accession Number:** Pending; ASM Job No. 12592
- 2b. AAA Permit No.:** 2025-016bl
- 2c. ASLD Lease Application No.:** N/A
- 2d. Other Permit Number(s):** N/A

Section 3. Organization/Consulting Firm

- 3a. Name:** Chronicle Heritage
- 3b. Internal Project Number:** 25-PC-08251
- 3c. Internal Project Name:** SRP Coronado Generating Station Class III
- 3d. Contact Name:** Angela Huster
- 3e. Contact Address:** 2025 North 3rd Street, Suite 157, Phoenix, Arizona 85004
- 3f. Contact Phone:** (541)979-3078
- 3g. Contact Email:** ahuster@chronicleheritage.com

Section 4. Sponsor/Lead Agency

- 4a. Sponsor:** Salt River Project (SRP)
- 4b. Lead Agency:** Arizona Corporation Commission
- 4c. Agency Project Number(s):** IO 1000055487
- 4d. Agency Project Name:** Task 3 - Coronado Generating Station Class III
- 4e. Funding Source(s):** SRP
- 4f. Other Involved Agencies:** N/A
- 4g. Applicable Regulations:** Arizona Antiquities Act (AAA; Arizona Revised Statute [A.R.S.] 41-841 et seq.), Arizona State Historic Preservation Act (SHPA; A.R.S. 41-861 to 864)

Section 5. Description of Project

Salt River Project (SRP; Client) is conducting environmental work in anticipation of converting the existing Coronado Generating Station (CGS) to run on natural gas. Potential ground disturbance will occur within the existing footprint of the CGS main plant site. The major modifications involve replacing burners within boilers which are located within an existing building and the construction of a new natural gas fuel yard and delivery system within the existing plant site. A typical fuel yard is cleared of vegetation, graded, and surfaced with gravel.

SRP contracted Chronicle Heritage to conduct a Class III cultural resource survey of 253.2 acres of SRP land for the Project.

Section 6. Project Area

The Project area, labeled as the Main Plant Site for the remainder of the report, is 6.31 miles to the northeast of the town of St. Johns, Apache County, Arizona, and is accessible via an unnamed, improved road off US Highway 191, which runs 3.75 miles east-west to the plant. The Main Plant Site consists of the current SRP Coronado Generating Plant property, which is an irregular square shaped 670-acre (ac) parcel. The Main Plant Site is approximately 1,660 m north-south by 1,830 m east-west at its furthest extents.

The Survey area includes the undeveloped portions of the main plant subject to the current archaeological investigations, which consist of five discontinuous, irregularly shaped parcels around the current SRP Coronado Generating Station Main Plant and entirely within the Main Plant Site. The NE Block is 124.4 ac and is approximately 1,360 m north-south by 840 m east-west at its furthest extents. The NW Block is 52.1 ac and is approximately 470 m north-south by 875 m east-west at its furthest extents. The SW (A) block is 15.1 ac and is approximately 255 m north-south by 340 m east-west at its furthest extents. The SW (B) block is 13.6 ac and is approximately 220 m north-south by 370 m east-west at its furthest extents. The SE Block is 47.9 ac and is approximately 255 m north-south by 805 m east-west at its furthest extents. The entire Main Plant Site area forms an irregular square shape, totaling approximately 1,580 m east-west by 1,635 m north-south and 253.2 ac of SRP land.

Section 7. Project Area Information

7a. Address:	East of US Highway 191, St. Johns, Arizona
7b. Route:	N/A
7c. Mileposts Limits:	N/A
7d. Nearest City/Town:	St. Johns, Arizona
7e. County:	Apache
7f. Project Locator UTM's:	NAD 83, Zone 12 658660 mE 3827596 mN
7g. Baseline & Meridian:	Gila and Salt River Baseline & Meridian
7h. USGS Quadrangle(s):	USGS 7.5' Saint Johns North, AZ (1985)
7i. Legal Description(s):	Sections 33 and 34 Township (T) 14 North (N), Range (R) 29 East (E)

Section 8. Survey Area

8a. Total Acres: 253.2

8b. Survey Area Summary:

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
SRP	253.2	N/A	N/A

Section 9. Environmental Contexts

9a. Landform: Flat plateau surrounded by ridges

9b. Elevation: 5,775 feet (ft) to 5,835 ft above mean sea level

9c. Surrounding Topographic Features: The Main Plant Site is immediately surrounded by several unnamed ridges, canyons, mesas, and small hills. Named topographic features include the “Badlands” approximately 3.3 miles (mi) to the southwest of the Main Plant Site and Valle Bonito 7.1 mi to the northeast.

9d. Nearest Drainage: The Corrizo Wash is 1.9 mi to the north of the Main Plant Site, the Little Colorado River is 6.4 mi to the southwest, and Kearn Lake is 1.1 mi to the east. No drainages cross the Main Plant Site, however, there are several minor draws and washes surrounding the landform.

9e. Local Geology: Surface geology consists of Pliocene to Middle Miocene (2-16 Ma) deposits comprised of moderately to strongly consolidated conglomerate and sandstone deposited in basins during and after late Tertiary faulting. These deposits are typically light gray or tan and include mudstone, siltstone, limestone, and gypsum, forming high rounded hills and ridges (Arizona Geological Survey 2025).

9f. Vegetation: The Main Plant Site is within the Northeast Arizona Shrub-Grassland Ecoregion, characterized by lower elevations, drier and warmer weather, and low precipitation compared to surrounding regions (Griffith et al. 2014). The biotic community is characterized as the Plains and Great Basin Grassland, including primarily shrub and grassland vegetation such as blue grama grass, buffalograss, Indian ricegrass, galleta grass, saltbush, snakeweed, juniper, pinyon pine, big sagebrush, rabbitbrush, shadscale, Mormon tea, blackbrush, black grama grass, galleta, and alkali sacaton among other grasses and forbs (Brown 1994).

Due to previous development and the construction of the CGS facilities within the Main Plant Site, little native vegetation remains. Chronicle Heritage observed limited grasses and small shrubs such as Russian thistle, bunchgrass, wolfberry, fourwing saltbush, as well as yucca, tamarisk, chamisa, and juniper trees.

9g. Soils/Deposition: Soil within the Main Plant Site is Clovis loamy sand (0-8 percent slopes) which derives from eolian sands and/or gravelly alluvium from metamorphic and sedimentary rock and forms on plains (Soil Survey Staff 2025).

9h. Buried Deposits: Not likely

9i. Justification: The generating station main plant has previously been subject to archaeological survey in 1974, which identified one archaeological site minimally intersecting the southwest corner of the Main Plant Site, and outside of the current Survey area. This site was a historic trash scatter, a site type that is unlikely to contain a buried component or to indicate the presence of other subsurface archaeological remains. The Main Plant Site itself has been developed and continually in use as a power generation facility since 1979 and any soil within the plant boundary has likely been disturbed. The current survey identified areas of miscellaneous modern trash dumping and large portions of the Survey area (~33%) have been artificially raised because of nearby pond excavation as well as grading below modern ground surface. Therefore, the likelihood of intact cultural deposits is low.

Section 10. Built Environment

The area within and immediately surrounding the Main Plant Site has been largely developed in association with the current Coronado Generating Station. This includes structures and associated facilities within the Main Plant Site, and 10+ improved and unimproved roads, and a railroad leading to the power plant. All these facilities were constructed ca. 1980 (Salt River Project 2023). The remaining area between the Main Plant Site and the town of St. Johns remains relatively undeveloped (Nationwide Environmental Title Research Online [NETROnline] 2026).

Section 11. Inventory Class Completed

- 11a. Class I Inventory:**
- 11b. Researcher(s):** Sophie Husslein, B.A., RA
- 11c. Class II Survey:** N/A
- 11d Sampling Strategy:** N/A
- 11e. Class III Inventory:**

Section 12. Background Research Sources

- 12a. AZSITE:**
- 12b. ASM Archaeological Records Office:**
- 12c. SHPO Inventories and/or SHPO Library:**
- 12d. NRHP Database:**
- 12e. ADOT Portal:**
- 12f. GLO Maps:** Plat 00602 (filed 1/25/1883) and Plat 00559 (filed 1/25/1883): Historic GLO maps depict one unimproved road, labeled "Road" oriented east-west intersecting the Survey area; no additional resources are within the study area. This 1883 road

follows the same alignment as the current power plant access road, oriented east-west which presently connects to US Highway 191 (BLM GLO 2025).

12g. Land-Managing Agency Files: SRP tDar.org Library

12h. Tribal Cultural Resources Files: N/A

12i. Local Government Websites: N/A

12j. Other: USGS 1:250,000 St Johns, AZ (1886, 1892), USGS 1:250,000 Saint Johns, AZ (1954, 1957, 1958, 1962), USGS 7.5' St Johns North, AZ (1974)

Depicts two unimproved roads (1954, 1957, 1958, 1962, 1974) within the study area. The 7.5' St Johns North, AZ (1974) map was revised in 1984 based on 1982 aerial imagery and depicts two railroads, the power plant, a transmission line, and 5+ unimproved roads within the Survey area and 1-mi study area radius, however since the map was revised in 1984, these are not considered historic resources (USGS 2025).

Section 13. Background Research Results

13a. Previous Projects Within the Project Area

1. Project Reference No.	2. Project Name	3. Author(s)	4. Year
1.60.SHPO	Coronado Project Archaeological Investigations (224R)	Bradford	1980
1986-216.ASM	SRP Greer Well Field/Pipeline	Stone	1986

13b. Previously Recorded Cultural Resources Within the Project Area

1. Site No./ Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)	6. Intersects Survey Area?
NA12740/ Ariz Q:7:16(MNA)*	Historic, Euro-American (ca. A.D. 1950's-1960's)	Trash dump	Not evaluated by recorder	Siegel and Bradford 1974	No

*This site was collected during the original recording, and could not be found during the 2002 resurvey of the adjacent section (Davis et al. 2002), where most of the site was located, suggesting that either collection was comprehensive enough to remove all evidence of the site, or that it was removed as litter at some time between the 1974 and 2002.

13c. Historic Buildings/Districts/Neighborhoods Within the Project Area

1. Property Name or Address	2. Year	3. Eligibility Status
N/A	N/A	N/A

13d. Historic USGS Map and GLO Properties Within the Project Area

1. Property Description	2. Map Year
N/A	N/A

13e. Background Research Narrative:

Chronicle Heritage examined records in AZSITE, the ASM ARO, and the National Register Information System (NRIS). The records search aimed to determine the location of any previously conducted archaeological projects and previously recorded archaeological sites within 1.0 mi of the Survey area. In addition, historic GLO plats, historic USGS maps, and historic aerial imagery were also consulted.

The record search identified a total of 16 previous projects completed within the 1.0-mi study area. Previous projects were conducted in support of the generating station, pipelines, access roads, wells, and disposal facilities. While two previous projects intersect the current Main Plant Site, 1.60.SHP0 and 1986-216.ASM, only 1.60.SHP0 intersects the Survey area. Due to improvements in survey methods and the moving 50-year window for eligibility for inclusion in the National Register of Historic Places (NRHP), jurisdictions within Arizona vary in how long they consider an archaeological survey to remain valid. The survey of the Main Plant Site was conducted in 1974 and was not completed according to current ASM and SHPO standards. This survey encompasses 253.2 ac (100 percent) of both the overall Main Plant Site and the Survey area - based on the original project maps (Bradford 1976), the AZSITE data for this project appears to be slightly misplotted. As a result, this survey project appears to have covered the entire Main Plant Area.

71 archaeological sites have been documented within the 1.0-mi study area, of which no sites intersect the current Survey area. One site intersects the Main Plant Site, site NA12740/ Ariz Q:7:16(MNA), a historic trash dump that was not evaluated by the recorder. Attempts to relocate this site in 2002 were unsuccessful (Davis et al. 2002), suggesting that either the collection noted during the original recording was comprehensive enough to largely remove evidence of the site, or that it was removed as litter at some point between the two recordings. Under current ASM policy concerning historic waste scatters (Arizona State Museum [ASM] 2021), this site - as originally described - would likely now be considered an IO, rather than a site. Note that in Figure 2, site NA12740/ Ariz Q:7:16(MNA) appears to not intersect the Main Plant Site; however, the official site card on file shows the site boundary extending into the same Township and Range section as the Main Plant Site boundary. One additional site, AZ Q:7:54(ASM)/AZ Q:7:113(MNA)/NA 17334 was projected by AZSITE digital records to intersect the Survey Area, however based on the sketch map on the original site card, this site is located approximately 875 m to the west of the Survey area and overall Main Plant Site (see Keller 1983; Keller and Spalding 1983).

No National Register listed properties are located within a 1-mi study area radius of the Survey area.

Historic GLO maps (Plat 00602 [filed 1/25/1883] and Plat 00559 [filed 1/25/1883]) depict one unimproved road, labeled "Road" oriented east-west intersecting the Survey area, but no additional resources are within the study area. This 1883 road follows the same alignment as the current power plant access road, oriented east-west which presently connects to US Highway 191 (BLM GLO 2025).

The following historic USGS maps were consulted: USGS 1:250,000 St Johns, AZ (1886, 1892), USGS 1:250,000 Saint Johns, AZ (1954, 1957, 1958, 1962), USGS 7.5' St Johns North, AZ (1974). The maps depict two unimproved roads (1954, 1957, 1958, 1962, 1974) within the study area, but no historic resources intersect the Survey area. The 7.5' St Johns North, AZ (1974) map was revised in 1984 based on 1982 aerial imagery, and depicts two railroads, the power plant, a transmission line, and 5+ unimproved roads within the Survey area and 1-mi radius (USGS 2025).

The earliest available historic aerial image is from 1972, which depicts one unimproved road immediately south of the Survey area, and no additional development within the Survey area or 1-mi study area. The next available image from 1983 shows the current generating station within the Main Plant Site, and a series of 10+ improved and unimproved roads and railroad lines in association with the powerplant. The Main Plant Site and the Survey area remain relatively unchanged between 1983 to the present.

Section 14. Cultural Contexts

- 14a. Prehistoric Culture:** Archaic, Ancestral Puebloan, Navajo
14b. Protohistoric Culture: Apache, Navajo, Hopi, Zuni
14c. Indigenous Historic Culture: Apache, Navajo, Hopi, Zuni
14d. Euro-American Culture: New Spain, Arizona Territory, State of Arizona

Section 15. Field Survey Personnel

- 15a. Principal Investigator:** Angela Huster
15b. Field Supervisor: Justin Parks
15c. Crew: Seth Allison and Heather Hoang
15d. Fieldwork Date(s): December 18-21, 2025

Section 16. Survey Methods

- 16a. Transect Intervals:** 20 m apart
16b. Coverage (%): 100%
16c. Site Recording Criteria: Fish (1995)
16d. Ground Surface Visibility: 70-80%
16e. Observed Disturbances: Miscellaneous modern trash dumping. Large portions of the Survey area (~33%) have been artificially raised because of nearby pond excavation as well as grading below modern ground surface.

Section 17. Field Survey Results

- 17a. No Cultural Resources Identified:**
17b. Historical In-Use Structures (IUs) Identified: Forms Attached:
 Number of IUs Recorded: 0
17c. Number of Isolated Occurrences (IOs) Recorded: 4

17d. Table of IOs:

1. IO No.	2. Description	3. Date Range	4. UTM's	
			Easting	Northing
1	1 white chert tertiary flake	Unknown prehistoric (12,000 B.C.-A.D. 1850)	██████	██████
2	1 Tularosa Black-on-white jar sherd	Ancestral Puebloan (A.D. 1150-1325; (Hays-Gilpin and Van Hartesveldt 1998)	██████	██████
3	1 gray chert tertiary flake	Unknown prehistoric (12,000 B.C.-A.D. 1850)	██████	██████

1. IO No.	2. Description	3. Date Range	4. UTM's	
			Easting	Northing
4	1 petrified wood tertiary flake	Unknown prehistoric (12,000 B.C.- A.D. 1850)		

Section 18. Comments/Recommendations

SRP contracted Chronicle Heritage to conduct a Class III cultural resource survey of 235.2 ac of the CGS Main Plant Site in support of conversion of the existing CGS plant to run on natural gas. Potential ground disturbance will occur within the existing footprint of the CGS main plant site. The major modifications involve replacing burners within boilers which are located within an existing building and the construction of a new natural gas fuel yard and delivery system within the existing plant site. A typical fuel yard is cleared of vegetation, graded, and surfaced with gravel.

The entire Main Plant Site was surveyed in the late 1970s, prior to the construction of the current generating station. One previously recorded site, historic trash scatter NA12740/ Ariz Q:7:16(MNA) was plotted as minimally intersecting the southwest corner of Main Plant Site. Under current ASM site definition standards, this site would likely be classified as an IO, rather than a site. Attempts to relocate the site during the survey of an adjacent section in 2002 were unsuccessful (Davis et al. 2002), suggesting that it is likely no longer extant.

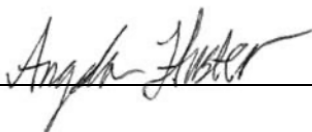
Chronicle Heritage archaeologists completed the Class III survey of the 253.2-ac Survey area within the CGS facility. The survey identified four IOs, all of which are prehistoric, and which consist of three flaked stone artifacts and one prehistoric ceramic sherd. No other cultural resources were identified within or adjacent to the Survey area beyond the four identified IOs. Chronicle Heritage recommends that none of the identified IOs are eligible for listing in the NRHP and that no further archaeological work is necessary prior to ground disturbing activities.

Section 19. Attachments

- 19a. Project Location Map:** Figure 1
- 19b. Land Jurisdiction Map:** Figure 1
- 19c. Background Research Map(s):** Figure 2
- 19d. GLO Map(s):** Figure 3
- 19e. Results of Survey Map:** Figure 4
- 19e. Survey Area Photograph(s):** Figure 5; Figure 6; Figure 7
- 19f. References:**

Section 20. Consultant Certification

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.


 _____ January 8, 2026

Signature

Date

Title: **Angela Huster, Ph.D., RPA** | Principal Investigator

Section 21. Discovery Clause

In the event that previously unreported cultural resources are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (m)(100 ft) until a qualified archaeologist has documented the discovery in consultation with the Arizona State Museum and SRP. Work must not resume within the Main Plant Site without approval of SRP.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 m (100 ft) of the encounter. All encounters will be treated in accordance with A.R.S. § 41-844, and work must not resume in this area without proper authorization.

State Historic Preservation Office | Survey Report Summary Form
 Class III Cultural Resources Survey of 253.2 Acres of Salt River Project Land in Support of the
 Coronado Generating Station, Apache County, Arizona

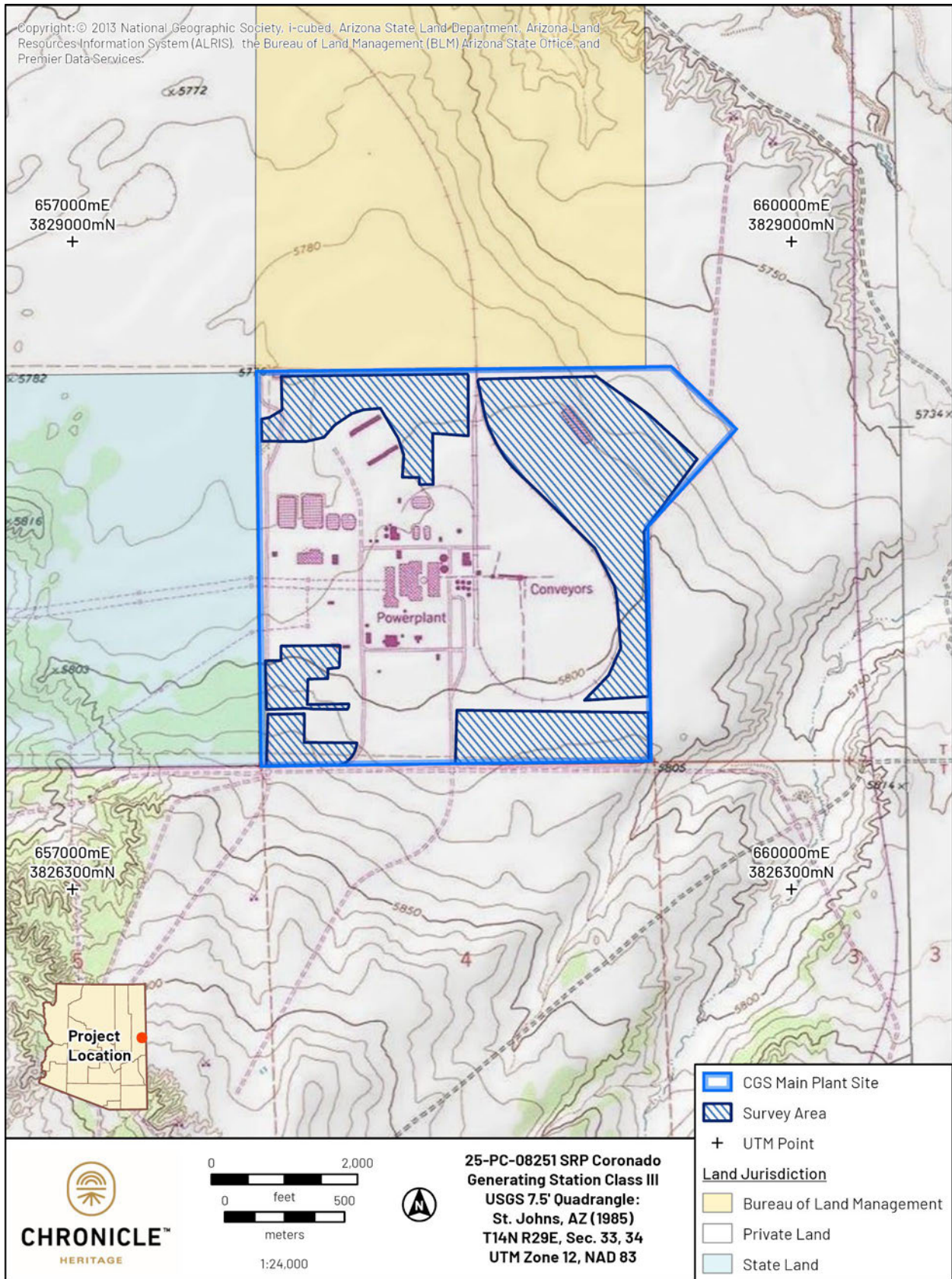


Figure 1. Main Plant Site and Survey area location map showing land jurisdiction.

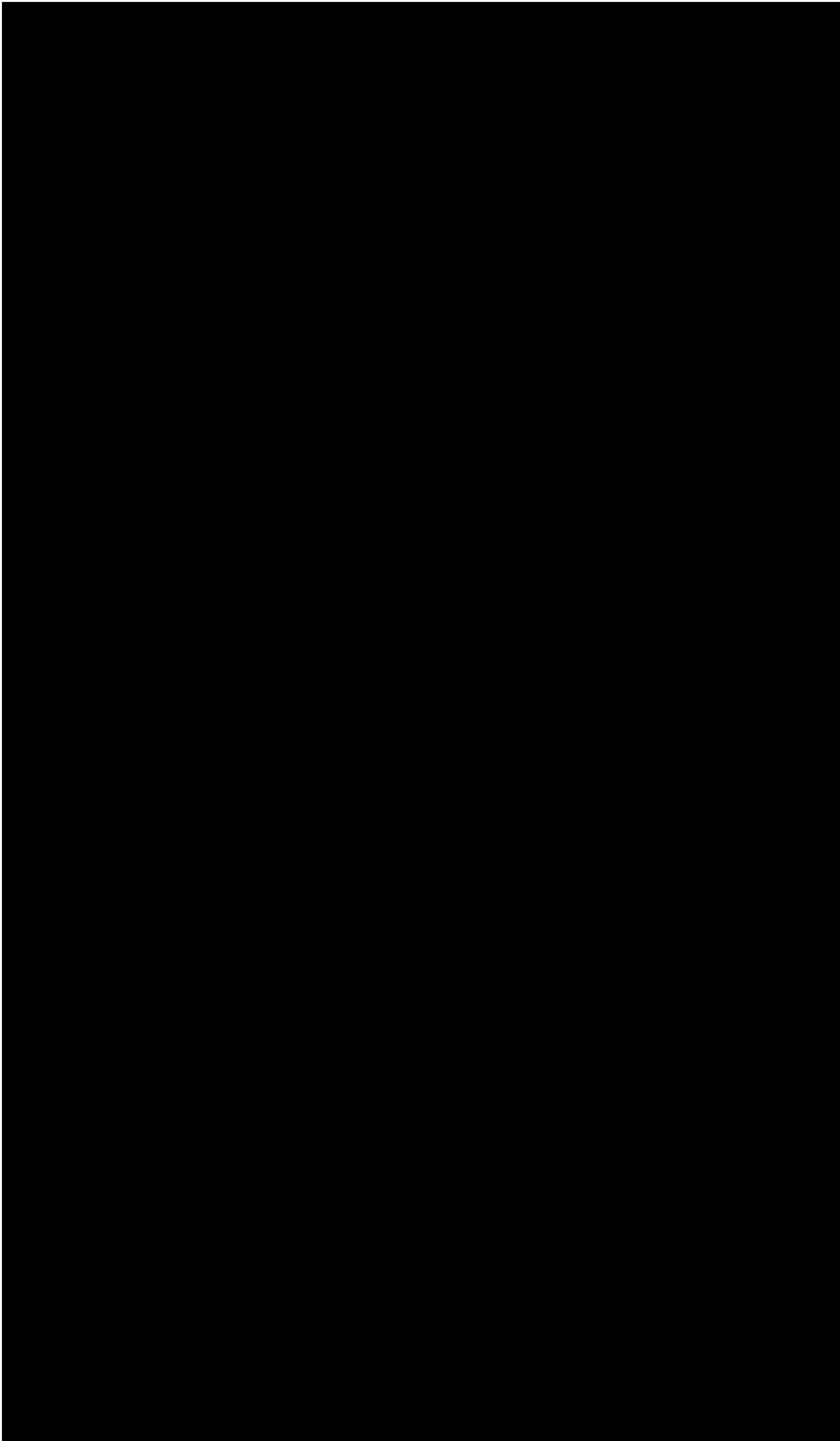


Figure 2. Main Plant Site and Survey area map showing previously recorded sites and projects within a 1-mi study area.

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State Historic Preservation Office | Survey Report Summary Form
 Class III Cultural Resources Survey of 253.2 Acres of Salt River Project Land in Support of the
 Coronado Generating Station, Apache County, Arizona

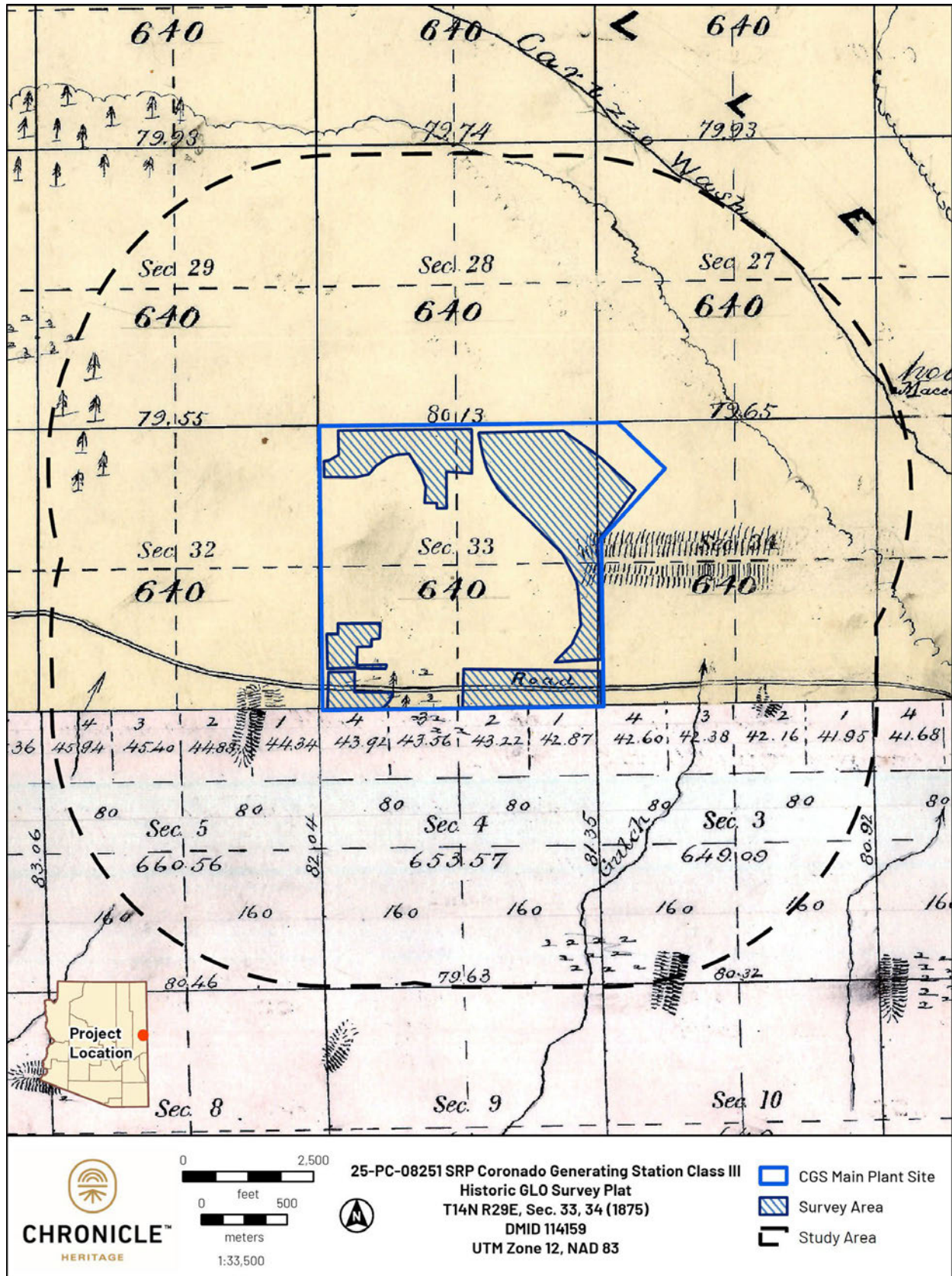


Figure 3. Main Plant Site and Survey area map showing historic GLO plats and resources.

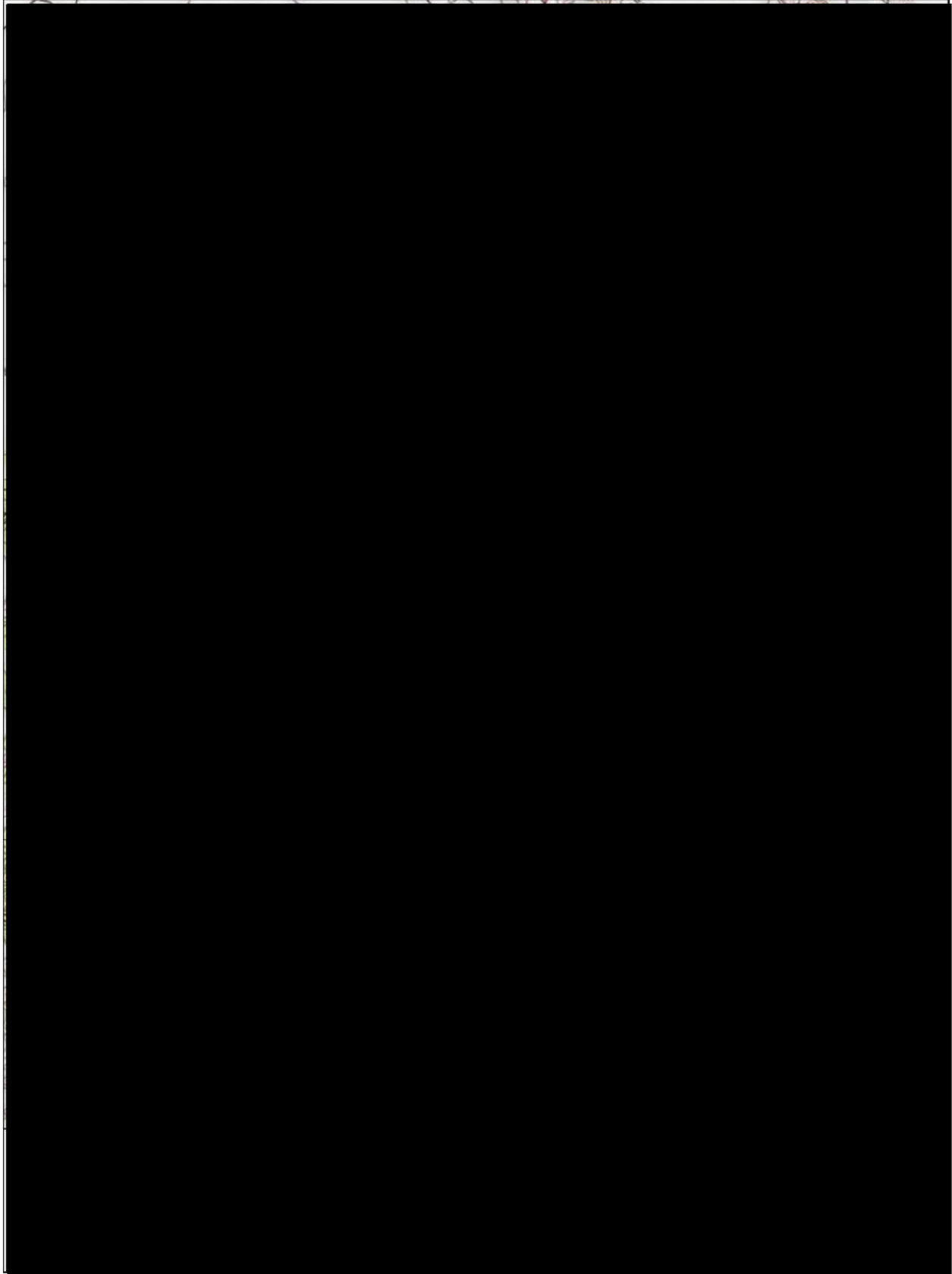


Figure 4. Main Plant Site and Survey area map showing the results of survey.



Figure 5. Overview photograph of Survey area, facing east.



Figure 6. Overview photograph of raised area, facing east.



Figure 7.102 (ceramic), plan view.

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For General Inquiries:

T: (886) 563-2536

T: (602) 254-6280

info@chronicleheritage.com



**Appendix C
USFWS IPaC and AZGFD ERT**



United States Department of the Interior



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

In Reply Refer To:
Project Code: 2026-0007056
Project Name: Coronado Repower

10/21/2025 21:14:06 UTC

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

To Whom It May Concern:

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

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

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

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

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

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

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

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

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

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

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

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

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

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

OFFICIAL SPECIES LIST

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

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2026-0007056
Project Name: Coronado Repower
Project Type: Power Gen - Natural Gas
Project Description: SRP Coal to natural gas
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.5783454,-109.27101772671949,14z>



Counties: Apache County, Arizona

ENDANGERED SPECIES ACT SPECIES

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

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

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

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

BIRDS

NAME	STATUS
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

FISHES

NAME	STATUS
Little Colorado Spinedace <i>Lepidomeda vittata</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6640	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885	Proposed Endangered

CRITICAL HABITATS

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

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

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

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

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

BALD & GOLDEN EAGLES

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

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

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

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

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

NAME	BREEDING SEASON
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Dec 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

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

Probability of Presence (■)

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

Breeding Season (■)

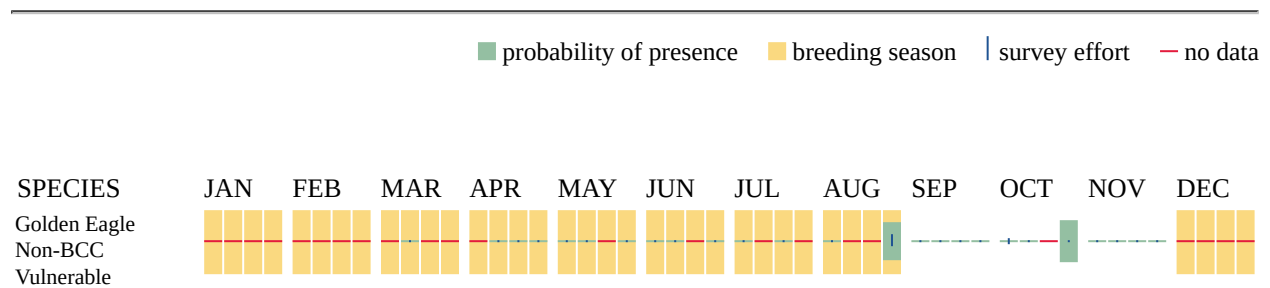
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

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

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>

- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

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

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

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

NAME	BREEDING SEASON
Broad-tailed Hummingbird <i>Selasphorus platycercus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11935	Breeds May 25 to Aug 21
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Dec 1 to Aug 31
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Olive-sided Flycatcher <i>Contopus cooperi</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31

NAME	BREEDING SEASON
Pectoral Sandpiper <i>Calidris melanotos</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Virginia's Warbler <i>Leiothlypis virginiae</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9441	Breeds May 1 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

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

Probability of Presence (■)

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

Breeding Season (■)

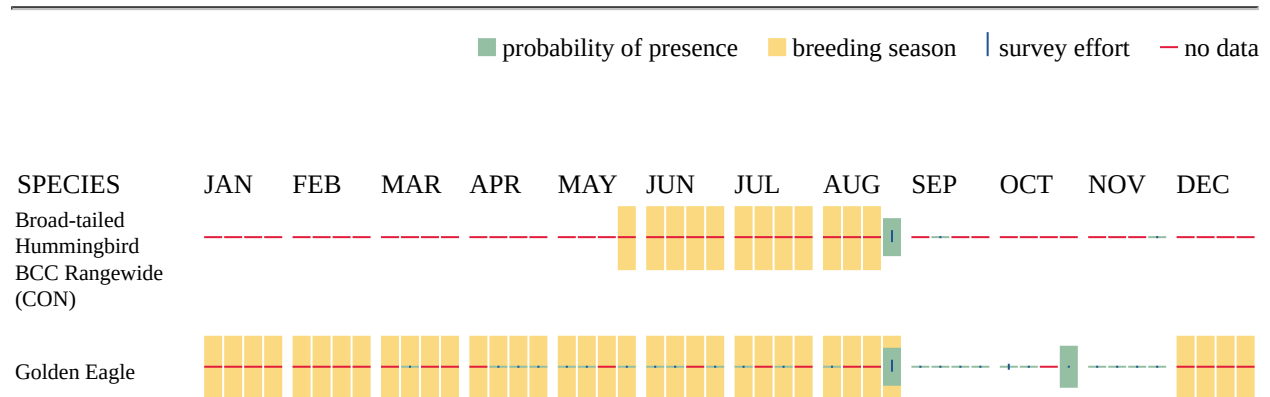
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

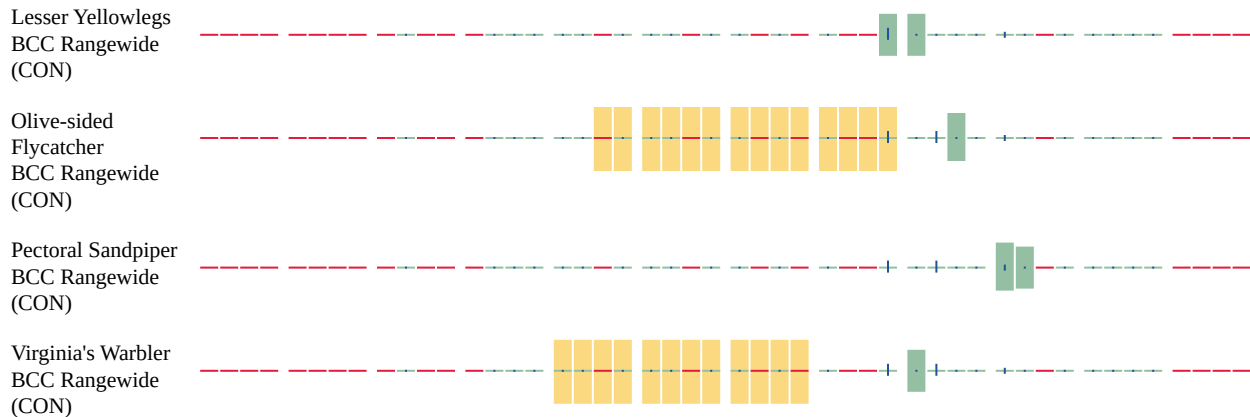
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.



Non-BCC
Vulnerable



Additional information can be found using the following links:

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

WETLANDS

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

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

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

LAKE

- L2UBH

FRESHWATER POND

- PUBF

IPAC USER CONTACT INFORMATION

Agency: Kimley Horn
Name: Emily Curci
Address: 1001 West Southern Ave Suite 131
City: Mesa
State: AZ
Zip: 85210
Email: emily.curci@kimley-horn.com
Phone: 6026783442

Arizona Environmental Online Review Tool Report



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

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

Project Name:

Coronado Repower

Project Type:

Energy Production/Storage/Transfer, Energy Production (generation), gas power plant
(maintenance/modification)

Project ID:

HGIS-26562

Project Description:

SRP Coal to Natural Gas

Contact Person:

Emily Curci

Organization:

Kimley Horn

On Behalf Of:

CONSULTING

Disclaimer:

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

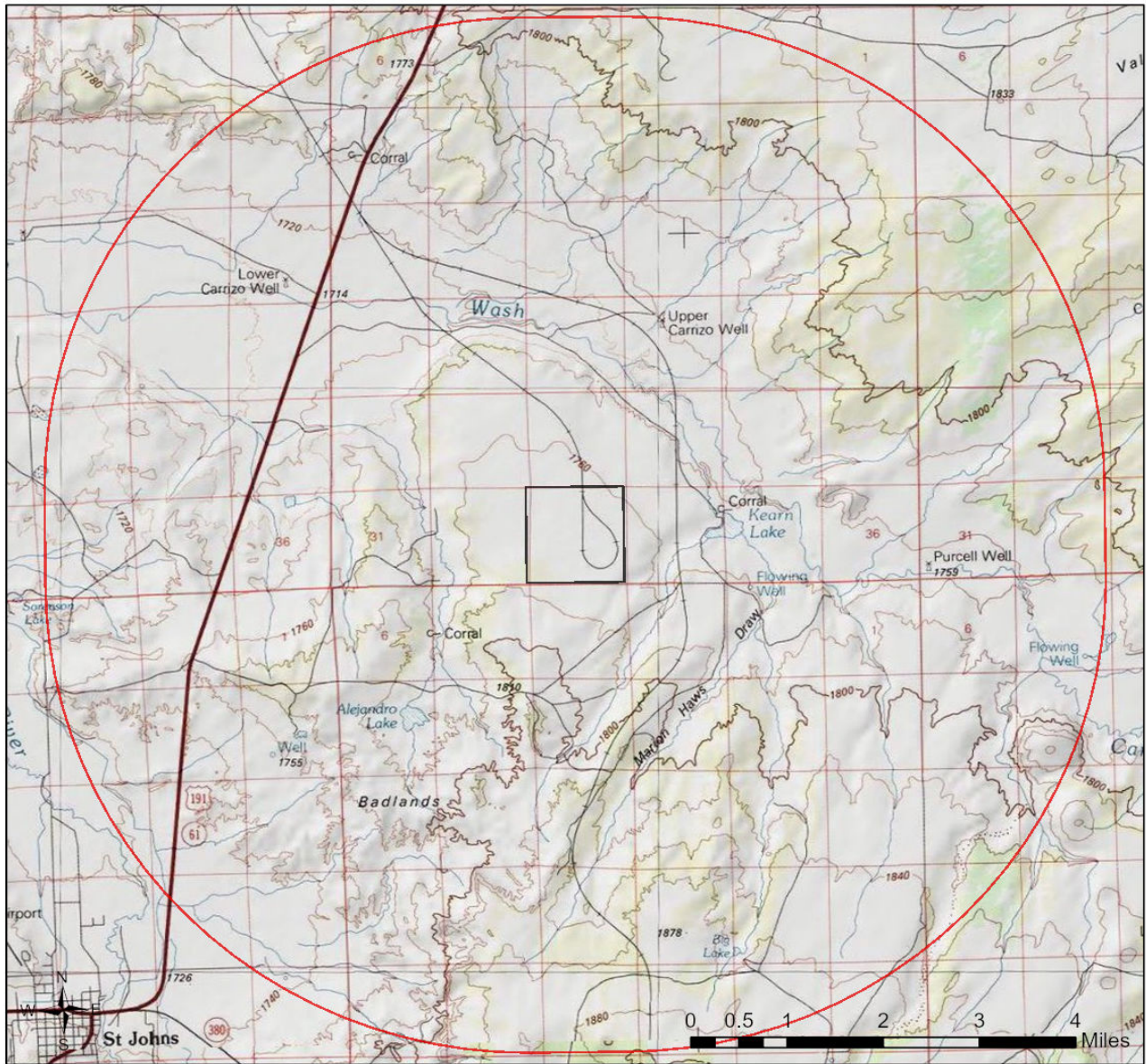
Locations Accuracy Disclaimer:

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

Recommendations Disclaimer:

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

Coronado Repower USA Topo Basemap With Locator Map



- Buffered Project Boundary
- Project Boundary

Project Size (acres): 661.43

Lat/Long (DD): 34.5783 / -109.2710

County(s): Apache

AGFD Region(s): Pinetop

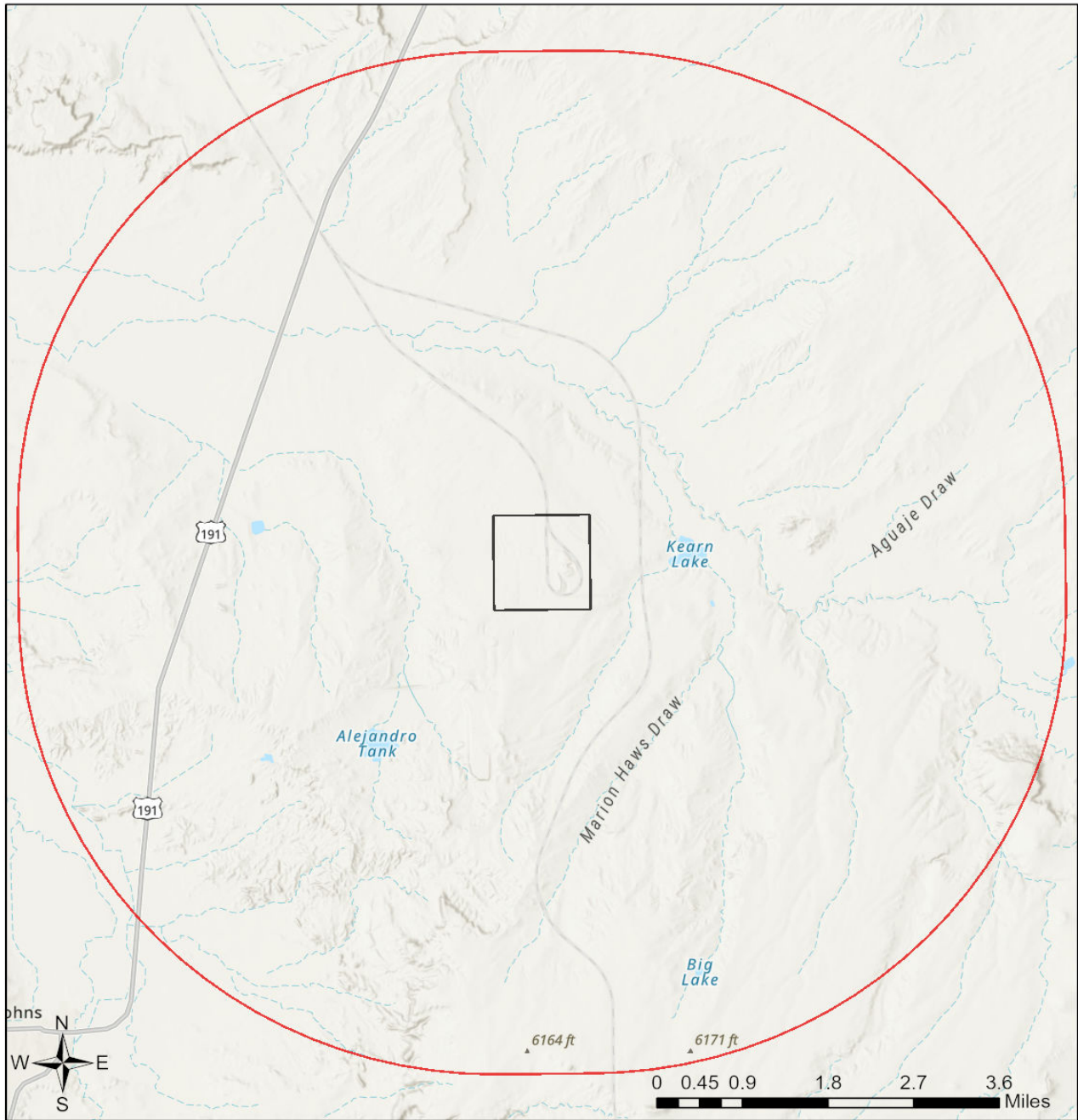
Township/Range(s): T13N, R29E; T14N, R29E

USGS Quad(s): SAINT JOHNS NORTH

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



Coronado Repower Important Areas

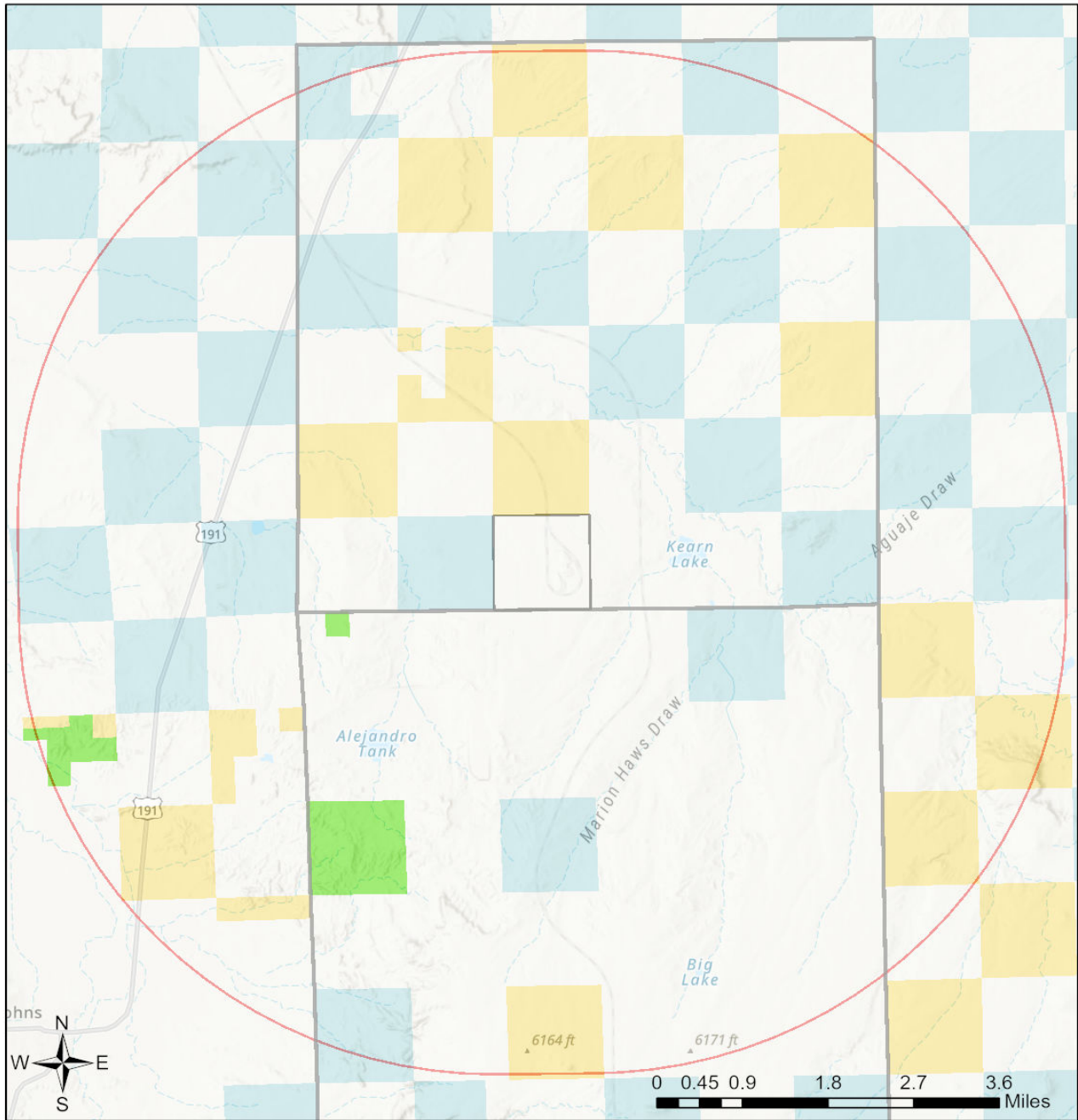


- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Wildlife Connectivity

Project Size (acres): 661.43
 Lat/Long (DD): 34.5783 / -109.2710
 County(s): Apache
 AGFD Region(s): Pinetop
 Township/Range(s): T13N, R29E; T14N, R29E
 USGS Quad(s): SAINT JOHNS NORTH

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

Coronado Repower Township/Ranges and Land Ownership



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

Project Size (acres): 661.43
 Lat/Long (DD): 34.5783 / -109.2710
 County(s): Apache
 AGFD Region(s): Pinetop
 Township/Range(s): T13N, R29E; T14N, R29E
 USGS Quad(s): SAINT JOHNS NORTH

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

Special Status Species Documented within 5 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Aphelocoma woodhouseii	Woodhouse's Scrub-Jay					2
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Chordeiles minor	Common Nighthawk					2
Eremophila alpestris	Horned Lark					2
Gymnorhinus cyanocephalus	Pinyon Jay	UR		S		2
Melospiza fusca	Canyon Towhee					2
Vireo vicinior	Gray Vireo		S			2

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

No Special Areas Detected

No special areas were detected within the project vicinity.

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Antilocapra americana americana	American Pronghorn					2
Aquila chrysaetos	Golden Eagle	BGA		S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					3
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Baeolophus ridgwayi	Juniper Titmouse					3
Buteo regalis	Ferruginous Hawk			S		2
Calcarius ornatus	Chestnut-collared Longspur					2
Chordeiles minor	Common Nighthawk					2
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat		S	S		1
Cynomys gunnisoni	Gunnison's Prairie Dog			S		1
Empidonax wrightii	Gray Flycatcher					2
Euderma maculatum	Spotted Bat		S	S		2
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon		S	S		1
Falco sparverius	American Kestrel					2
Icterus bullockii	Bullock's Oriole					2
Lanius ludovicianus	Loggerhead Shrike					2
Lasiurus cinereus	Hoary Bat					2
Myotis yumanensis	Yuma Myotis					2
Neotamias cinereicollis	Gray-collared Chipmunk					2
Neotamias minimus	Least Chipmunk		S			2
Neotoma stephensi	Stephen's Woodrat					2
Nyctinomops macrotis	Big Free-tailed Bat					2
Oreoscoptes montanus	Sage Thrasher					2

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Perognathus flavus goodpasteri	Springerville Pocket Mouse		S			2
Poocetes gramineus	Vesper Sparrow					2
Rallus limicola	Virginia Rail					3
Rana pipiens	Northern Leopard Frog		S	S		1
Rana yavapaiensis	Lowland Leopard Frog		S	S		1
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Toxostoma bendirei	Bendire's Thrasher					2
Vireo vicinior	Gray Vireo		S			2

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Antilocapra americana americana	America Pronghorn					
Callipepla squamata	Scaled Quail					
Odocoileus hemionus	Mule Deer					
Zenaida macroura	Mourning Dove					

Project Type: Energy Production/Storage/Transfer, Energy Production (generation), gas power plant (maintenance/modification)

Project Type Recommendations:

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

Minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects and pathogens. Precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at <https://www.invasivespeciesinfo.gov/> and the Arizona Native Plant Society <https://aznps.com/invas> for recommendations on how to control these species. To view a list of documented invasive species or to report invasive species in or near your project area visit [iMapInvasives](https://imap.naturereserve.org/imap/services/page/map.html) - a national cloud-based application for tracking and managing invasive species at <https://imap.naturereserve.org/imap/services/page/map.html>.

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

Follow manufacturer's recommended application guidelines for all chemical treatments. The U.S. Fish and Wildlife Service, Integrated Pest Management Group has a reference document that serves as their pesticide recommendations for protecting wildlife and fisheries resources, titled "Reducing Risks to Pollinators from Pest Control", <https://www.fws.gov/sites/default/files/documents/Reducing%20Risks%20to%20Pollinators%20From%20Insect%20and%20Plant%20Pest%20Control%20-%20Farmlands.pdf> The AZGFD recommends that direct or indirect impacts to sensitive species and their forage base from the application of chemical pesticides or herbicides be considered carefully when identifying timing, location, and application methods.

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

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

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

Arizona's wildlife is highly dependent on any available surface water. Wildlife, especially waterfowl, are attracted to any form of open water. Implement measures to prevent wildlife access to water collection/storage basins, evaporation or settling ponds, and/or facility storage yards containing hazardous and other human-made substances. Design slopes to discourage wading birds and use fencing, netting, hazing or other measures to exclude wildlife.

Project Location and/or Species Recommendations:

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at <https://www.azgfd.com/wildlife-conservation/conservation-and-endangered-species-programs/burrowing-owl-management/>.