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

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

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

## **Visual Resources**

#### **Overview**

This section of Exhibit E addresses the inventory of and potential effects to scenic or visual resources in relation to construction and operation of the Project. The methodology for this assessment is identified below and includes separate discussions associated with scenery (i.e., scenic quality) and sensitive viewers. The methodology is followed by the results of the inventory and the impact assessment, both of which include separate discussions for scenery and sensitive viewers within the context of the Study Area. The Project is located on privately owned land within the City of Coolidge. The Project does not occur on lands managed by the BLM, U.S. Forest Service, or any other agency that requires conformance with visual resource management objectives or guidelines, and does not occur within any designated national or state scenic areas.

## Methodology

The purpose of the visual impact assessment is to identify and characterize the level of visual modification in the landscape that would result from the construction and operation of the Project. 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 refers to specific viewers and/or groups of viewers whose views could be affected by potential changes to the landscape. The methods used to conduct this visual impact assessment are consistent with past visual resource studies conducted for projects that have been approved by the Siting Committee.

Visual resource information and data for the visual assessment of the Study Area was developed based on research, available geographic information system (GIS) data, aerial photography, and on-site field verification and photographic documentation. These data were collected for all lands, regardless of jurisdiction, and used to develop a comprehensive understanding of the existing landscape and associated visual resources.

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 the 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 or 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 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.

#### **SCENERY**

In the context of the Project, scenery is a measure of the inherent aesthetic value of the landscape based on the appearance of existing landscape features, including landforms, vegetation, and built features. In general terms, the scenic quality is based on the premise that landscapes with greater diversity and visual variety in landforms and vegetation are more aesthetically pleasing, and therefore hold greater value. For this analysis, impacts to scenic quality were based on comparing the inventoried quality of the scenery (characteristic landscape) to the anticipated quality considering changes in the characteristic landscape as a result of the construction and operation of the Project.

#### SENSITIVE VIEWERS

The concept of sensitive viewers refers to members of the public that could have potential views of the Project and may be sensitive to potential changes in the scenery that surrounds them. With regard to sensitive viewers, the Project contrast is dependent on several factors, including viewing distance, duration of view, viewing condition, and degree of visibility. When combined, these factors indicate the overall visual dominance of the Project within the landscape. The term "viewing distance" refers to the viewer's physical distance from the Project components and is predicated on the fact that one's ability to discern details dissipates over distance. The duration of view refers to the length of time and associated angle of view that the Project would be visible and is based on the idea that viewer attention is attracted to a higher degree as the duration of view increases. Viewing conditions refer to whether the viewer is looking down at the Project from a superior position, looking up at the Project from an inferior position, or viewing the Project from an elevation that is similar to that of the Project (i.e., a neutral view). The term "degree of visibility" refers to whether views of the Project would be either open and unobstructed or partially to fully obstructed by other features in the existing landscape (i.e., topography, vegetation, or built features). The degree of visibility also refers to whether the Project would be viewed against the sky (i.e., skylined) or viewed against a backdrop of landforms, vegetation, and/or built features.

Anticipated viewer sensitivities to visual changes are also discussed within the analysis, including brief discussions regarding the potential sensitivities of different types of identified viewer groups within the vicinity of the Project. Residential and recreational viewer groups are typically considered to have high sensitivities 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).

# **Inventory Results**

#### **SCENERY**

The Study Area is located within the Sonoran Basin and Range Level III ecoregion and specifically the Gila/Salt Intermediate Level IV ecoregion (Griffith 2014). The scenery of the Study Area is consistent with rural and agriculture-dominated landscapes in this region of central Arizona. There are flat open

fields that are actively being used year-round within the Study Area and open desert beyond the Study Area to the east and panoramic views of the Granite Hills approximately 8 miles to the southeast. The Project is located next to an existing switchyard, generating facility, and associated utility infrastructure. Additionally, existing residential and industrial/manufacturing facilities within the community of Randolph are located near the Project.

The scenic quality within the Study Area can be considered low based on the general lack of visually interesting landforms and vegetation, and the prominence of existing built features and development that contrasts with the appearance of the natural landscape.

#### **SENSITIVE VIEWERS**

#### Residences

A variety of residences are located within the Study Area, including dispersed, farm-based housing and associated out-structures north and south of the Project Area and denser clusters of houses in the community of Randolph immediately to the west of the Project Area. The Arizona Training Program is a long-term care facility located approximately 0.4 mile southwest of the Project.

#### **Recreation Areas**

Randolph Park is the nearest existing recreation facility located within the Study Area, approximately 0.10 mile west of the Project. In addition, per the Pinal County Open Spaces and Trails Master Plan, a proposed multi-use trail is planned to parallel UPRR directly adjacent to the Project Site.

#### **Travel Routes**

The primary travel routes within the Study Area and in proximity of the Project include SR 287, which runs north—south and is located approximately 0.25 mile west of the Project Site, and Randolph Road, which runs east—west and is located approximately 0.4 mile north of the site. 5<sup>th</sup> Avenue runs north—south and is located adjacent to the site (within 0.1 mile). Kleck Road, approximately 0.3 mile south of the Project Site, is a local collector road running east—west that services dispersed residences south and southeast of the Project Site. There are numerous local collector streets that are within the community of Randolph that are within 0.25 to 0.4 mile of the Project Area.

## Impact Assessment Results

The sections below provide a general description of the potential impacts on scenic quality and sensitive viewers based on the construction and operation of the Project. Overall, impacts associated with the Project would be low to moderate because the Project components would appear similar to the existing electrical generation and transmission infrastructure that occurs adjacent to the Project Area, which is a visually dominant feature in the landscape.

#### **SCENERY**

The Project would introduce an approximately 100-acre generation facility and associated infrastructure that includes new evaporation ponds, gas turbines with supporting wet surface air coolers, switchyard infrastructure, and a 500-kilovolt transmission line interconnection. The interconnection consists of A-frame structures and monopoles that are associated with the existing transmission line. The form, line, color, textures, and scale of the Project facilities would be similar in appearance to existing generation facility and transmission line infrastructure as well as industrial facilities within the existing landscape, though the Project facilities would be at a greater density and add cumulatively to the existing industrial

infrastructure in the area. The Project is expected to create moderate impacts to the existing, relatively low scenic quality within the Study Area. Project components could be seen and would begin to attract attention though would be similar to or subordinate to other built features within the landscape such as the existing electrical generation and transmission infrastructure, which would result in a moderate degree of contrast, resulting in moderate impacts to scenery. Furthermore, nighttime impacts associated with facility lighting would be minimized by meeting night-sky requirements of the City of Coolidge by implementing directional or fully shielded light fixtures, focusing lighting only on the intended area to avoid light spill and off-site light trespass, and implementing light filters as prescribed to reduce glare and associated skyglow.

#### **SENSITIVE VIEWERS**

The following is a summary of anticipated impacts to sensitive viewers resulting from the construction and operation of the Project.

#### Residences

Although views from residences within the Study Area would vary based on location from unobstructed to partially or fully obstructed, most views of the Project would be partially obstructed by existing features within the landscape, including vegetation, buildings, and other built features, such as the industrial facilities near Randolph Road and SR 287. Based on the generally flat landforms within the Study Area, views from residences would generally be from a neutral viewing position and would include skylined views of the transmission line interconnection and new structures within the existing substation, where visible.

Viewers from the nearest residences would have partially obstructed views of the Project, represented by Key Observation Points (KOPs) 5A and 5C (see Exhibits G-14 and G-15, respectively), approximately 0.10 and 0.07 mile west of the Project, respectively. The form, line, color, texture, and scale of the Project components as viewed from these locations would be similar to those found within the existing visual setting, though views of the Project from KOP 5C would have less screening and more direct views compared with KOP 5A, which has more intervening structures and similar infrastructure when viewed from this location. Despite the relatively close proximity of these residences and the anticipated long duration of view, the Project could be seen but would be seen in the context of other similar existing utility structures and would not attract attention from KOP 5A. Furthermore, the Project components when viewed from KOP 5A would be subordinate to other built features within the landscape such as existing electrical transmission and distribution lines, resulting in a weak degree of contrast and low impacts. Comparatively, Project components when viewed from KOP 5C would appear codominant with existing substation infrastructure, resulting in a moderate degree of contrast and moderate impacts.

Similar to viewers on SR 287, viewers from the Arizona Training Program facility represented by KOP 6 (see Exhibit G-16) would have unobstructed to partially screened views of the Project; however, the Project would be seen in the context of existing utility infrastructure. The form, line, color, texture, and scale of the Project features would be similar to those of the existing transmission line infrastructure in the adjacent switchyard and generation facility and thus would not attract attention, resulting in weak contrast and low impacts.

#### **Recreation Areas**

Views from Randolph Park would be unobstructed and from a neutral position. Project features would be skylined but would be seen in the context of the existing switchyard and, while attracting attention, would result in a moderate degree of contrast with moderate impacts to viewers. Similarly, the viewers along the

planned multi-use trail would have neutral viewing position with unobstructed views of the Project, but views would be seen in the context of the existing utility infrastructure. While the Project would attract attention, contrast would be moderate, resulting in moderate impacts.

#### **Travel Routes**

Views from travel routes within the Study Area would vary based on location from unobstructed to partially or fully obstructed. Most views of the Project would be partially obstructed by existing features within the landscape, such as trees, existing buildings, and other built features. Based on the generally flat landform on which the Project would be located, views of the Project from travel routes would generally be from a neutral viewing position and would include skylined views of the transmission lines and substation infrastructure, where visible.

SR 287 is a north—south-oriented primary travel route within the Study Area located approximately 0.35 mile west of the Project and is represented by KOP 6 for northbound travelers. The form, line, color, texture, and scale of the Project features would be similar to those of the existing transmission line infrastructure in the area. Due to the orientation of travelers along SR 287 in the northbound and southbound directions, the Project would be viewed peripherally and for a short duration of time based on travel speeds. Intervening vegetation, existing transmission line infrastructure, and surrounding residential structures would further influence the viewers' ability to focus on the Project. Additionally, the industrial complex at the intersection of SR 287 and Randolph Road would screen views for travelers near that intersection. The Project could be seen but would not attract attention and would be subordinate to other built features within the landscape, resulting in a weak degree of contrast and low impacts.

Randolph Road is an east—west-oriented primary travel route within the Study Area and is represented by KOP 1 looking southeast and KOP 2 looking southwest across the Project (see Exhibits G-12 and G-13). These KOPs are located approximately 0.6 and 0.35 mile, respectively, away from the Project. Due to the orientation of travelers along Randolph Road in the Study Area, the Project would be viewed peripherally from the westbound and eastbound travel lanes for a short duration of time based on travel speeds. Additionally, the existing transmission line, and industrial and farm infrastructure between the traveler and Project as viewed from KOP 1 would further influence the viewers' ability to focus attention and discern the Project. The Project could be seen but would not attract attention from KOP 1 and would be subordinate to other built features within the landscape as viewed from this KOP, resulting in a weak degree of contrast and low impacts. The addition of the Project as viewed from KOP 2 would have unobstructed views of the Project, which would be skylined, appearing dominant and of greater density along the horizon compared with the existing switchyard and generation facility. Although the Project would be seen in the context of the existing substation and generation facility infrastructure, the Project's dominance, and its prominence due to the lack of intervening existing infrastructure or natural screening, would result in a high degree of contrast and high impacts.

Views from North Vail Road and East Kleck Road, southeast of the Project Site, as represented by KOP 7 (see Exhibit G-17), would have unobstructed views of the Project with skylined views of the generation features and additional switchyard infrastructure. Similar to KOP 2, the addition of Project components when viewed from this KOP would appear dominant and of greater density along the horizon compared with the existing switchyard and generation facility. Although the Project would be seen in the context of the existing substation and generation facility infrastructure, the Project's dominance and prominence would result in a high degree of contrast and high impacts.

Other roads with views of the Project would be from 5<sup>th</sup> Avenue, Bell Street, and other collector streets within the community of Randolph, which are approximately 0.25 to 0.40 mile from the nearest Project components. KOP 5C is a typical representation of these travel routes, as well as residential views from

the community. The form, line, color, texture, and scale of the Project features would be similar to those of the existing transmission line infrastructure in the area and adjacent switchyard and thus would not attract attention, resulting in weak contrast and moderate impacts.

#### CONCLUSION

Overall, the Project would be similar in form, line, color, texture, and scale compared with other existing transmission line, existing generating facility, and substation infrastructure in the Study Area, though the cumulative increase of infrastructure and facilities with the addition of the Project would result in moderate impacts to scenery. Similarly, impacts to sensitive viewers would range from high to low as a result of viewer perspective, perceived contrast, intervening visual elements such as existing infrastructure and vegetation, and the duration of view of the Project along travel routes within the Study Area. Of the six KOPs analyzed, KOPs 1, 5A, and 6 are expected to have low impacts. Kop 5c is expected to have moderate impacts, and high impacts associated with KOPs 2 and 7 are expected.

# Historic Sites and Structures, and Archaeological Sites

As required by the Arizona Corporation Commission Rules of Practice and Procedure R14-3-219, the potential effects of the proposed Project on historic sites and structures and archaeological sites were assessed. The assessment also was prepared to support Arizona Corporation Commission compliance with the State Historic Preservation Act (A.R.S. § 41-861 through § 41-864), which requires state agencies to consider impacts of their programs on historic properties listed in or eligible for listing in the Arizona Register of Historic Places (ARHP), and to provide the State Historic Preservation Office an opportunity to review and comment on the actions that affect such historic properties.

To be eligible for the ARHP, a property must be at least 50 years old (less, if they have special significance) and have national, state, or local significance in American history, architecture, archaeology, engineering, or culture. They should also possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet at least one of the four following criteria:

- Criterion (a): be associated with significant historical events or trends
- Criterion (b): be associated with historically significant persons
- Criterion (c): have distinctive characteristics of a style or a type, or have artistic value, or represent a significant entity whose components may lack individual distinction
- Criterion (d): have yielded or have the potential to yield important information concerning history or prehistory

# Methodology

The area studied for the purpose of assessing potential impacts to historic sites and structures, as well as archaeological sites, is a 1-mile-wide buffer from Project Site. SWCA reviewed archival records to identify such properties within the Study Area. Data sources searched include the AZSITE database, the Arizona State Museum (ASM) Archaeological Records Office, the National Register of Historic Places database, and General Land Office plat maps and historic-era topographic maps. The identification effort was supplemented by an in-field cultural resources survey of the Project Site, herein referred to as the Survey Area (Petersen 2021). Correspondence with Native American Tribes is included in Exhibit E-1.

#### Historic-era Sites

The records review identified no known or potential historic-era sites within the area studied. No historic-era sites were found within the Survey Area.

#### Historic-era Structures

The records review identified seven known (previously documented) historic-era structures in the area studied, including four in-use roads, one in-use railroad, one in-use overhead utility line, and a series of in-use or recently used irrigation canals identified by previous researchers as cultural resources. One of the historic-era roads, SR 87, has been determined eligible for listing in the ARHP under Criterion (a), for its association with Arizona's historic-era highway system. The other roads include Randolph Road, Kleck Road, and Vail Road, all of which are local section line roads that have been previously considered ineligible for listing in the ARHP. The UPRR (formerly Southern Pacific Railroad Wellton-Phoenix-Eloy Spur) is the historic route of railroad service between Tucson and Phoenix, and has been determined eligible for the ARHP under Criterion (a), for its association within transcontinental railroading in Arizona, 1878–1940. The rails no longer carry passenger trains. Adjacent to the railroad and within the railroad right-of-way (ROW), is a historic-age overhead utility line that likely serves to support UPRR operations. Although previously considered ineligible when evaluated as an individual property for the ARHP, additional research would be needed to evaluate its potential significance as a contributing component of the ARHP-eligible UPRR. A series of 22 historic-age concrete-lined irrigation ditches within and near the historic-era sites and structures study area were assigned a single ASM site number. The irrigation ditches, believed to have been constructed in the mid-twentieth century, were considered ineligible for the ARHP. No historic structures were identified during inspection of the Survey Area.

## Archaeological Sites

Four prehistoric archaeological sites have been documented within the Study Area, all of which consist of Hohokam (A.D. 300–A.D. 1450) artifact scatters and two of which also contain artifacts indicative of earlier Archaic period (7500 B.C. –A.D. 300) use. Three of these sites have not been evaluated for their eligibility for listing in the ARHP, and the fourth requires archaeological test excavations to determine its eligibility. No archaeological sites, features, or artifacts were found within the Survey Area.

#### Assessment of Effects

A project can have direct and/or indirect effects on historic sites and structures and archaeological sites when it alters the characteristics that qualify it for listing in the ARHP. Effects are adverse when they diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects on historic properties include, but are not limited to:

- Physical destruction of or damage to all or part of the property
- Removal of the property from its historic location
- Change of the character of the property's use of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic characteristics
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe
- Transfer, lease, or sale of a property out of government ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance

#### **DIRECT EFFECTS**

No ARHP-eligible properties were found during the survey of the Project Site; therefore, no ARHP-eligible properties would be directly affected by the Project.

#### INDIRECT EFFECTS

Two ARHP-eligible properties eligible under Criterion (a) are outside the area of direct effects. These properties include SR 87 and the UPRR. Construction of the existing plant introduced a new visual element to the area, but did not diminish the integrity of the characteristics of these properties for which they are eligible for the ARHP. The proposed expansion would impose little additional impacts beyond those already imposed on these properties.

Archaeological sites are most commonly eligible for the ARHP under Criterion (d), i.e., for the information held in their archaeological deposits. The four archaeological sites within the area studied are outside the area of direct effects; therefore, no impacts, whether direct or indirect, would be expected to the affect the components of the four archaeological sites for which they may be eligible (i.e., the Project would not negatively affect the archaeological deposits held within the sites).

#### Conclusion

Based on the foregoing information, the Project is not expected to directly or indirectly result in negative impacts to historic sites, structures, or archaeological sites.

## References

Griffith, G.E., Omernik, J.M., Johnson, C.B., and Turner, D.S., 2014, Ecoregions of Arizona (poster): U.S. Geological Survey Open-File Report 2014–1141, with map, scale 1:1,325,000, http://dx.doi.org/10.3133/ofr20141141

Petersen, Eric. 2021. Cultural Resources Survey of Approximately 93 Acres for the Proposed Coolidge Expansion Certificate of Environmental Compatibility Project, Pinal County, Arizona. Tucson, Arizona: SWCA Environmental Consultants.

## **EXHIBIT E-1 – TRIBAL CONSULTATION LETTERS**



Biological and Cultural Resources | PAB359 P.O. Box 52025 Phoenix, AZ 85072-2025

October 28, 2021

Mr. Robert Miguel Chairman Ak-Chin Indian Community 42507 W. Peters & Nall Road Maricopa, Arizona 85138

RE: Consultation for the Proposed Coolidge Expansion Project

Dear Mr. Miguel,

Salt River Project Agricultural Improvement and Power District (SRP) is proposing construction of the Coolidge Expansion Project (Project), which entails the expansion of and upgrades to the existing Coolidge Generating Station in Coolidge, Pinal County, Arizona. The project area is an approximately 93-acre rectangular area within SRP-owned tax parcel number 401-30-001D, south of the existing Coolidge Generating Station and east of an existing SRP transmission line. The project area is located near the community of Randolph, within the incorporated limits of the City of Coolidge, approximately 4 miles south of Coolidge's historic town center (Figures 1 and 2). The project area is currently used for agricultural purposes.

SRP is seeking a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC) for this project. Consulting parties for this project include the Arizona State Historic Preservation Office, Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, and Yavapai Apache Nation.

SRP retained SWCA Environmental Consultants (SWCA) to conduct a Class III (i.e., full coverage) cultural resources survey of the project area to identify any cultural resources that are within the project area and that may be directly affected by the Project's construction. No archaeological sites or historic-era buildings or structures were identified within the project area. Additionally, SWCA's study included a records review to identify previous cultural resources studies and known cultural resources that are within 1.0 mile of the project area. Nearby historic-era structures that have been previously considered to be of historical significance include State Route 87 and the Union Pacific Railroad (the former Southern Pacific Railroad Wellton-Phoenix-Eloy Spur). A copy of the report is enclosed for your review and comment. All cultural

Exhibit E-1a. Example tribal consultation letter.

resource locational information, including maps, will be redacted from any copies of the document available to the general public.

Please let SRP know if you have any concerns regarding cultural resources as well as any sites of traditional, religious, cultural, or historical importance to your community within the Project vicinity. SRP anticipates filing the CEC Application by December 13, 2021, and would greatly appreciate any comments by November 30, 2021. Please provide comments to my attention, using the details below:

Daniel Garcia
Senior Cultural Resource Management Specialist
SRP Biological and Cultural Resource Services PAB359
P.O. Box 52025, Phoenix, AZ 85072-2025
Dan.Garcia@srpnet.com

Your correspondence will be included as part of the Project record that is filed with the ACC. Additional project information regarding the project is available online at https://srpnet.com/electric/transmission/projects/Coolidge. If you have any further questions or would like to discuss the results of the cultural resources survey, please do not hesitate to contact me by email or by telephone at 602.236.2336.

Cordially,

Daniel Garcia, M.A., RPA

SRP Archaeologist - Senior Cultural Resource Management Specialist

Cc (with enclosures): E. Peters/Ak-Chin Indian Community



Exhibit E-1a. Example tribal consultation letter (continued).

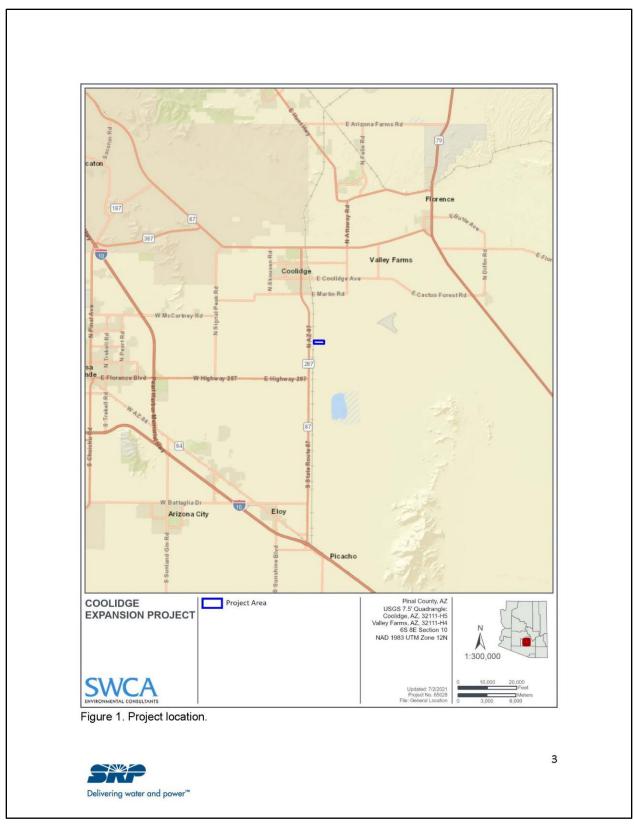


Exhibit E-1a. Example tribal consultation letter (continued).

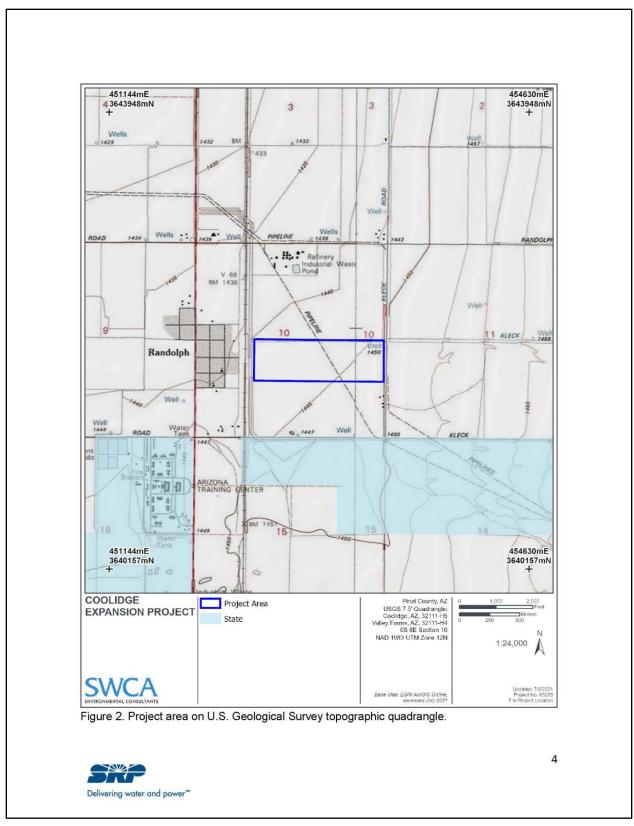


Exhibit E-1a. Example tribal consultation letter (continued).





Biological and Cultural Resources | PAB359 P.O. Box 52025 Phoenix, AZ 85072-2025

October 28, 2021

Mr. Timothy L. Nuvangyaoma Chairman Hopi Tribe P.O. Box 123 Kykotsmovi, Arizona 86039

RE: Consultation for the Proposed Coolidge Expansion Project

Dear Mr. Nuvangyaoma,

Salt River Project Agricultural Improvement and Power District (SRP) is proposing construction of the Coolidge Expansion Project (Project), which entails the expansion of and upgrades to the existing Coolidge Generating Station in Coolidge, Pinal County, Arizona. The project area is an approximately 93-acre rectangular area within SRP-owned tax parcel number 401-30-001D, south of the existing Coolidge Generating Station and east of an existing SRP transmission line. The project area is located near the community of Randolph, within the incorporated limits of the City of Coolidge, approximately 4 miles south of Coolidge's historic town center (Figures 1 and 2). The project area is currently used for agricultural purposes.

SRP is seeking a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC) for this project. Consulting parties for this project include the Arizona State Historic Preservation Office, Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, and Yavapai Apache Nation.

SRP retained SWCA Environmental Consultants (SWCA) to conduct a Class III (i.e., full coverage) cultural resources survey of the project area to identify any cultural resources that are within the project area and that may be directly affected by the Project's construction. No archaeological sites or historic-era buildings or structures were identified within the project area. Additionally, SWCA's study included a records review to identify previous cultural resources studies and known cultural resources that are within 1.0 mile of the project area. Nearby historic-era structures that have been previously considered to be of historical significance include State Route 87 and the Union Pacific Railroad (the former Southern Pacific Railroad Wellton-Phoenix-Eloy Spur). A copy of the report is enclosed for your review and comment. All cultural

Exhibit E-1b. Hopi Tribe response letter.

resource locational information, including maps, will be redacted from any copies of the document available to the general public.

Please let SRP know if you have any concerns regarding cultural resources as well as any sites of traditional, religious, cultural, or historical importance to your community within the Project vicinity. SRP anticipates filing the CEC Application by December 13, 2021, and would greatly appreciate any comments by November 30, 2021. Please provide comments to my attention, using the details below:

Daniel Garcia Senior Cultural Resource Management Specialist SRP Biological and Cultural Resource Services PAB359 P.O. Box 52025, Phoenix, AZ 85072-2025 Dan.Garcia@srpnet.com

Your correspondence will be included as part of the Project record that is filed with the ACC. Additional project information regarding the project is available online at https://srpnet.com/electric/transmission/projects/Coolidge. If you have any further questions or would like to discuss the results of the cultural resources survey, please do not hesitate to contact me by email or by telephone at 602.236.2336.

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signs & cont to the

Cordially,

Daniel Garcia, M.A., RPA

SRP Archaeologist - Senior Cultural Resource Management Specialist

Cc (with enclosures): S. Koyiyumptewa/Hopi Tribal Cultural Preservation Office



From: Karl Hoerig <a href="mailto:khoerig@pascuayaqui-nsn.gov">khoerig@pascuayaqui-nsn.gov</a> Sent: Monday, November 15, 2021 9:31 AM
To: Garcia Daniel M (Dan) < Dan.Garcia@srpnet.com>

Subject: Coolidge Expansion Project

#### **CAUTION - EXTERNAL EMAIL**

Phishing? **Click the fish** in Outlook For mobile forward to <a href="mailto:phish@srpnet.com">phish@srpnet.com</a>

Dear Mr. Garcia,

Thank you for your letter and accompanying materials requesting consultation in consideration of the planned Coolidge Expansion Project.

The Pascua Yaqui Tribe is not aware of any unidentified heritage resources located within the immediate project area. However, please note that the towns of Coolidge and Eloy are both identified by the Tribe as near-reservation Tribal communities and have significant populations of PYT Tribal members. Based on the late-nineteenth and early-twentieth century presence of an expanding number of Hiaki families in the area, Hiaki (Yaqui) should be included on line 14c of the SHPO Survey Report Summary Form for this project. Furthermore, Hiaki elders have shared traditional knowledge of precolonial (that is, prehistoric and protohistoric) Hiaki communities in the region, including specifically in the vicinity of Toltec near the project area.

Because of the Hiaki families in Eloy and Coolidge, we have concerns that every effort be made to ensure that an expansion of the generation plant not cause additional decrease in the air quality in those communities.

With best regards, Karl Hoerig

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
7777 S. Camino Huivisim, Building C
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

Exhibit E-1c. Pascua Yaqui Tribe response letter.

From: Garcia Daniel M (Dan) < Dan.Garcia@srpnet.com>

Sent: Monday, November 22, 2021 4:35 PM

To: Karl Hoerig <a href="mailto:khoerig@pascuayaqui-nsn.gov">khoerig@pascuayaqui-nsn.gov</a>

Cc: Roessel Robert W (Bob) <a href="mailto:khoerig@pascuayaqui-nsn.gov">khoerig@pascuayaqui-nsn.gov</a>

Subject: RE: Coolidge Expansion Project

Dear Dr. Hoerig,

On behalf of Salt River Project, I would like to thank you for your email. We were unaware of Yaqui tribal communities in the vicinity of the Coolidge Expansion Project and appreciate you bringing this to our attention. If you are amenable, I would like to invite you to meet with me and Bob Roessel, SRP Executive Principal for Intergovernmental Relations, to discuss how SRP interacts with Yaqui tribal communities.

With regards to the Class III Cultural Resources report, we will ask our consultant to revise the report and will include updated information about Yaqui presence in the region during the historic era in our upcoming application for a Certificate of Environmental Compatibility (CEC) for the project.

With regards to the impacts of air quality on nearby Tribal communities, please be assured that SRP's intent is to be fully compliant with Pinal County Air Quality standards. A copy of SRP's Title V/Class I Permit Revision Air Quality Application is available for your review on our <u>project website</u>: <a href="https://srpnet.com/electric/transmission/projects/Coolidge/pdfx/Air-Permit-Application.pdf">https://srpnet.com/electric/transmission/projects/Coolidge/pdfx/Air-Permit-Application.pdf</a>. Please

let me know if you have any questions.

Respectfully,

#### Dan Garcia

Archaeologist - Senior Cultural Resource Management Specialist SRP | Biological and Cultural Resource Services | PAB359 P.O. Box 52025, Phoenix, AZ 85072-2025 P: (602) 236-2336 | M: (480) 213-1177

Exhibit E-1d. SRP response to Pascua Yaqui Tribe response letter.



# White Mountain Apache Tribe

### Office of Historic Preservation PO Box 1032

Fort Apache, AZ 85926 Ph: (928) 338-3033 Fax: (928) 338-6055

To: Daniel Garcia, M.A., RPA. SRP Archaeologist Senior Cultural Resource Mngt.

Date: November 17, 2021

Re: Section 106 Consultation for the Proposed Coolidge Expansion Project

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; <u>October 28, 2021.</u> In regards to this, please attend to the following statement below.

.....

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed construction of the Coolidge Expansion Project, which entails the expansion of and upgrades to the existing Coolidge Generating Station in Coolidge, Pinal County, Arizona.

Please be advised, we reviewed the consultation letter and the information provided, and we've determined the project plans will have "No Adverse Effected" to the tribe's cultural heritage resources and/or traditional cultural properties, and concur with its findings.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark T. Altaha

White Mountain Apache Tribe – THPO Historic Preservation Office

Exhibit E-1e. White Mountain Apache Tribe response letter.

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