

Marigold Transmission Project

Application for a Certificate of Environmental Compatibility

Prepared for:

**Arizona Power Plant and Transmission Line
Siting Committee**

Prepared by:

Salt River Project

Case No.:

Docket No.:

Volume 1 of 1

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LIST OF ACRONYMS AND ABBREVIATIONS

ACC	Arizona Corporation Commission
A.D.	Anno Domini
ADA	Arizona Department of Agriculture
ADOT	Arizona Department of Transportation
AGFD	Arizona Game and Fish Department
AM	Amplitude Modulation
ANPL	Arizona Native Plant Law
ANSI	American National Standards Institute
APE	Area of Potential Effect
APLIC	Avian Power Line Interaction Committee
A.R.S.	Arizona Revised Statutes
ASLD	Arizona State Land Development
ASM	Arizona State Museum
AWCS	Arizona Wildlife Conservation Strategy
AZ	Arizona
B.C.	Before Christ
BCC	Birds of Conservation Concern
BCR	Bird Conservation Region
BESS	Battery Energy Storage System
BGA	Bald and Golden Eagle Protection Act
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMPs	Best Management Practices
CAP	Central Arizona Project
CCA	Candidate Conservation Agreement
CCAA	Candidate Conservation Agreement and Assurances
CEC	Certificate of Environmental Compatibility
dBa	A-weighted Decibel
ED3	Electrical District No.3
EPA	U.S. Environmental Protection Agency
ENO	Excessive Noise Ordinance
ESA	Endangered Species Act
FAST	Fixing America's Surface Transportation
FHWA	Federal Highway Administration
FM	Frequency Modulation
GHz	Gigahertz
GLO	General Land Office
GR	General Rural
GRIC	Gila River Indian Community
GSF	Groundwater Savings Facility
HDMS	Heritage Data Management System
HGIS	Heritage Geographic Information System
IBA	Important Bird Area
IPaC	Information for Planning and Consultation
ISO	International Organization for Standardization
ISP	Integrated System Plan
I-10	Interstate-10
I-11	Interstate-11

Km	Kilometer
KOPs	Key Observation Points
KPE	KP Environmental, Inc.
kV	Kilovolt
LCRMSCP	Lower Colorado River Multi Species Conservation Program
Ldn	Day-Night Average Sound Level
LE	Listed Endangered
LS	Logan Simpson
LT	Listed Threatened
LTSCs	Long-Term Storage Credits
MBTA	Migratory Bird Treaty Act
MHz	Megahertz
MMBtu	Million British Thermal Units
Mph	Miles Per Hour
MSIDD	Maricopa-Stanfield Irrigation and Drainage District
MW	Megawatt
MWh	Megawatt-hour
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
PAD	Planned Area Development
PV	Photovoltaic
RH	Relative Humidity
ROW	Right-Of-Way
SC	Species of Concern
SGCN	Species of Greatest Conservation Need
SHPO	State Historic Preservation Office
SPRR	Southern Pacific Railroad
SR	State Route
SRP	Salt River Project Agricultural Improvement and Power District
SWAP	State Wildlife Action Plan
SWCA	Steven W. Carothers & Associates
TIMP	Transportation Improvement and Maintenance Program
TRC	The Research Cooperation
TYPSA	Tecnica y Proyectos, S.A.
USBR	U.S. Bureau of Reclamation
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey

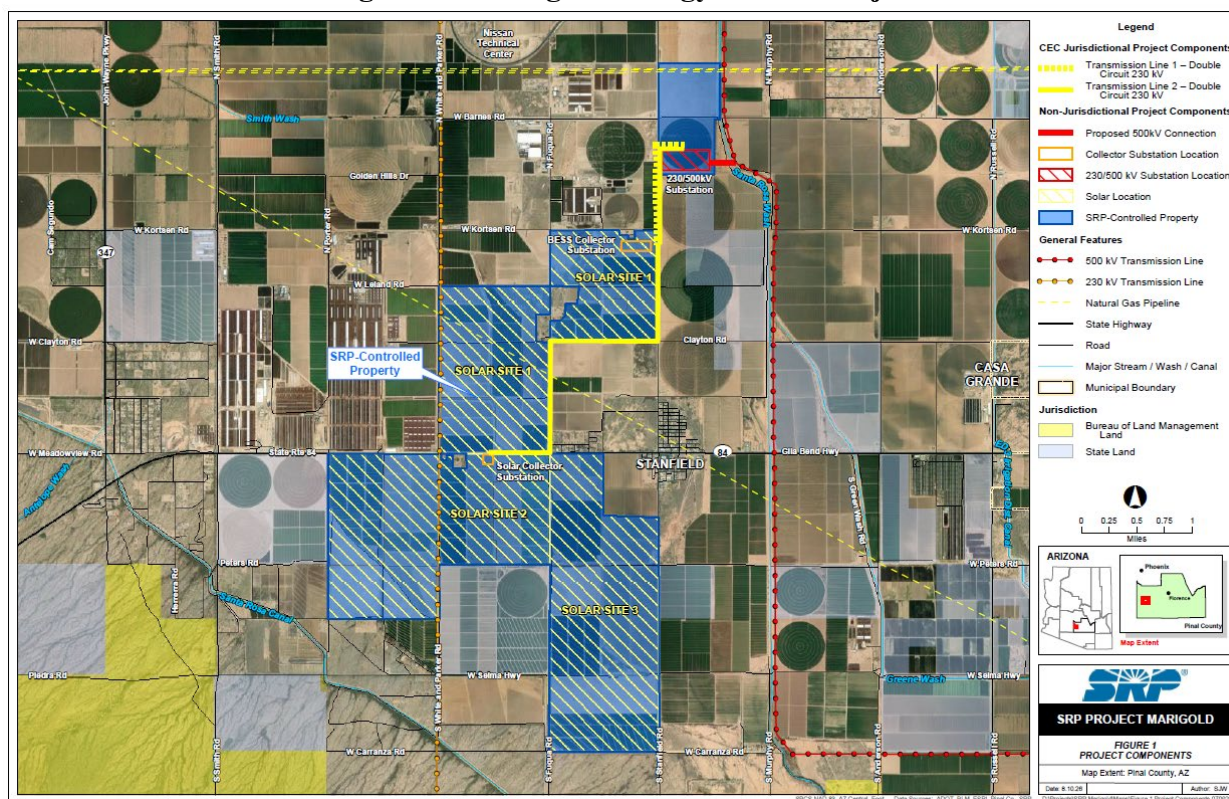
INTRODUCTION

Salt River Project Agricultural Improvement and Power District (SRP), under Arizona Revised Statutes (A.R.S.) § 40-360 *et seq.*, submits this application (Application) for a Certificate of Environmental Compatibility (CEC) for approximately 4.5 miles of two 230 kV double-circuit transmission lines (Transmission Lines or Transmission Line Project). The Transmission Lines are part of the Marigold Energy Center Project (Energy Center) which includes the following elements in addition to the Transmission Lines: (1) up to 600 megawatts (MW) of solar photovoltaic generation; (2) a battery energy storage system (BESS) that has a capacity of 400 MW and can store up to 3,200 megawatt-hours (MWh) of energy; (3) a new 500/230 kV substation (Marigold Substation); (4) a 675 MW three unit natural gas-fired power plant; (5) two short 230 kV double circuit gen-tie lines connecting the thermal generation plant to the Marigold Substation; and (6) two short 500 kV transmission lines interconnecting the Marigold Substation to the 500 kV Duke – Pinal Central transmission line as the Energy Center’s connection to the regional grid.¹ The Transmission Lines will connect the Energy Center’s solar generation and BESS to the Marigold Substation.

Although the Application provides general information on the overall Energy Center, as shown in **Figure 1**, the solar generation, BESS, the Marigold Substation, and the short 230 kV and 500 kV transmission lines are not under the jurisdiction of the Arizona Corporation Commission (ACC) and therefore, are not part of this Application. This Application only requests a CEC for the Transmission Line Project.

¹ This Application is for a CEC for the Transmission Lines. SRP may file separately an application for a CEC for the natural gas fired generation and will request consolidation of this CEC Application with the natural gas CEC application as appropriate.

Figure 1 – Marigold Energy Center Project



As noted above, this Application requests a CEC for the Transmission Line Project. The Transmission Lines will interconnect solar generation and the BESS to the Marigold Substation. The Transmission Lines will support necessary energy and reliability to serve expected load growth in Pinal and Maricopa Counties and strengthen system reliability.

As required by Arizona Administrative Code R14-7-119, this Application is structured as follows:

- Application
- Exhibit A – Project Location and Land Use
- Exhibit B – Environmental Studies
- Exhibit C – Areas of Biological Wealth
- Exhibit D – Biological Resources
- Exhibit E – Scenic Areas, Historic Sites and Structures, Archaeological Sites
- Exhibit F – Recreational Purposes and Aspects
- Exhibit G – Concepts of Typical Facilities

- Exhibit H – Existing Plans
- Exhibit I – Noise Emissions and Communication Interference
- Exhibit J – Special Factors

A list of abbreviations is provided following the Table of Contents.

Purpose and Need

SRP is committed to providing reliable, affordable, and sustainable electric service throughout its service territory, including more than 1.1 million customers in Maricopa County and more than 97,000 customers in Pinal County. SRP anticipates approximately 8 percent annual energy growth in the region over the next decade. Consistent with SRP's 2023 Integrated System Plan (ISP), population growth, economic development, electrification, and increasing commercial and industrial activity are expected to significantly increase electricity demand across the region over the coming decade. To meet this demand, the ISP identified the need for additional generation and transmission infrastructure, including new and upgraded transmission facilities to support resource integration and long-term system reliability.

The purpose of the Transmission Line Project is to provide the transmission capacity necessary to interconnect and deliver energy from the Energy Center to SRP's electric system. The project will support reliable electric service by enabling the delivery of new energy and capacity resources and enhancing operational flexibility during peak demand conditions and system contingencies.

The Transmission Line Project is needed to integrate new generation resources, maintain reliable service to existing and future customers, and support implementation of SRP's regional transmission strategy. Without the project, the ability to deliver energy and capacity from the Energy Center and future resources would be constrained, limiting SRP's ability to meet forecasted demand and reliability objectives.

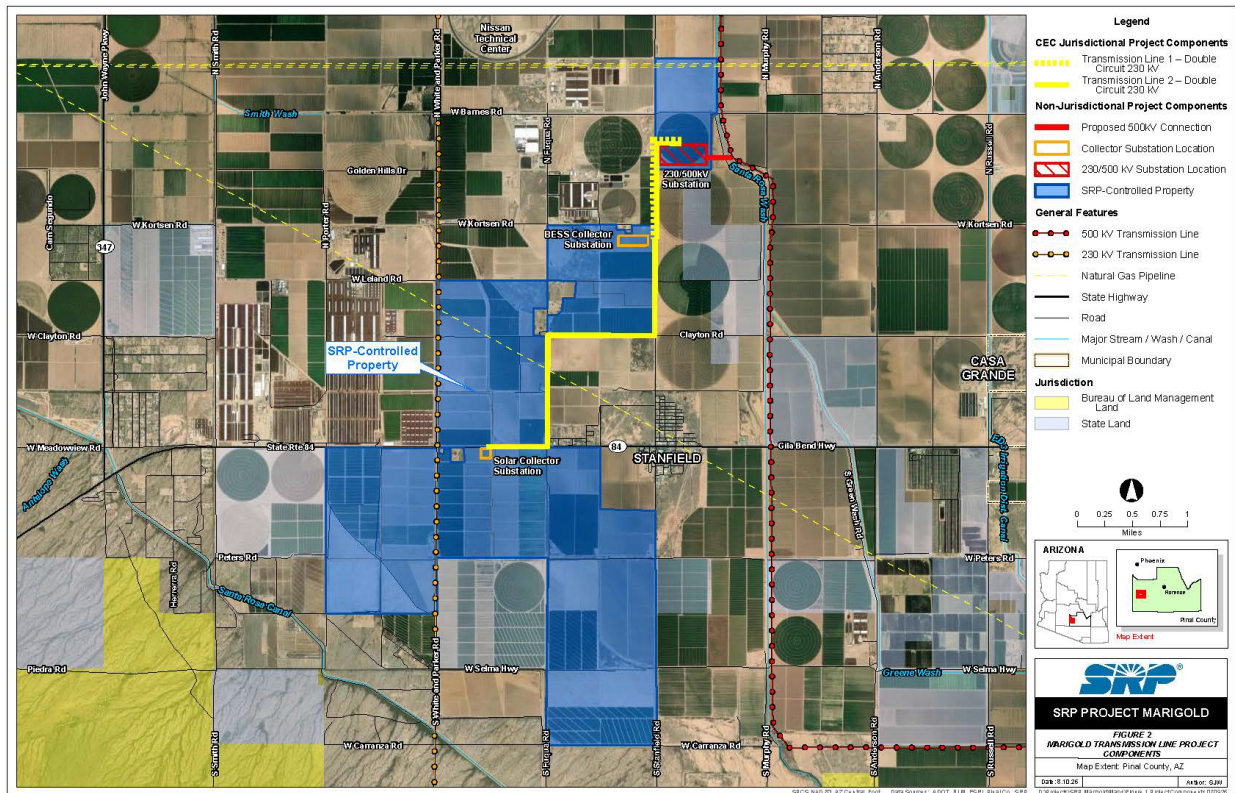
In addition, the Marigold Energy Center Project, including the Transmission Lines, will support Electrical District No. 3 (ED3), a regional public power utility that serves the communities of Maricopa, Stanfield, and the surrounding area. ED3, which operates as a full-service utility and has a service area of 384 square miles, primarily purchases power under long-term agreements to meet its load requirements. ED3 is collaborating with SRP on the Energy Center, which has the ability to enhance its service to local customers with reliable and competitively priced electricity. ED3 intends to purchase a portion of the Energy Center generation capacity in the future. In addition, SRP is proposing the Transmission Lines have the capability to support 69 kV underbuild, which ED3 or other local energy providers may utilize.²

Constructing the Transmission Lines as two 230 kV double-circuit transmission lines, which can support up to 12 conductors, serves multiple purposes and demonstrates SRP's commitment to strategic long-term transmission planning. As described above, the Transmission Lines will interconnect the Energy Center's solar generation and BESS to the Marigold Substation. The solar

² The 69 kV transmission lines are non-jurisdictional and therefore are not a part of this Application.

generation and BESS require a minimum of six conductors or two circuits. A minimum of three conductors or one circuit) will be used for the solar generation, and a minimum of three conductors or one circuit) will be used for the BESS. Locating the wires for the BESS and solar generation on separate pole structures improves system reliability; in the event of a single Transmission Line outage, SRP will be able to continue to operate the other Transmission Line and associated generation or storage resource. In addition, the double-circuit design allows each structure attachment point to accommodate up to a maximum of 12 wires or two circuits, leaving two positions available for future generation and transmission projects following completion of the Energy Center. Accordingly, the Transmission Lines are not solely intended to serve the Energy Center but will also provide transmission and Marigold Substation access opportunities for future SRP and third-party projects. By incorporating additional transmission capacity at the time of construction, SRP can optimize the use of transmission infrastructure and right-of-way space, support future regional energy development, and minimize the need for additional transmission structures and related land use impacts in the area.

Figure 2 – Marigold Transmission Line Project Components



Project Description and Route. Two 230 kV double-circuit transmission lines are required to interconnect the solar and storage elements of the Energy Center, via collector substations, to the new Marigold Substation so that the energy and capacity can interconnect to the transmission system. See **Figure 2** above.

230 kV Transmission Lines. Where the lines parallel, SRP has selected one route for the two 230 kV double-circuit transmission lines that are needed to connect the Marigold Substation to the BESS Collector Substation (*Transmission Line 1*) and the Solar Collector Substation

(*Transmission Line 2*) (Proposed Route). As further described below, Transmission Line 2 continues to travel southwest to the Solar Collector Substation, while Transmission Line 1 stops at the BESS Collector Substation. The Proposed Route is located on SRP Property for the majority of the route, which minimizes impacts to privately owned parcels.

Transmission Line 1. A new 230 double-circuit kV transmission line will interconnect the Marigold Substation to the BESS Collector Substation. This line will exit the Marigold Substation heading west, approximately 0.25 miles south of W Barnes Road, then turn south to travel along N Stanfield Road. Transmission Line 1 requires an approximately 0.5 mile segment of ROW on private property along N Stanfield Road until the line can be sited on the west side of the road on SRP-owned property, traveling an additional 0.4 miles. At this point, the line will turn west to enter the BESS Collector Substation.

Transmission Line 2. A second new 230 kV double circuit transmission line will interconnect the Marigold Substation to the Solar Collector Substation south of Highway 84. The line will exit the Marigold Substation and turn south along N Stanfield Road, sharing a corridor with Transmission Line 1 until Transmission Line 1 turns west to enter the BESS Collector Substation. From that point, Transmission Line 2 will continue south until it meets W Clayton Road and then turn west, traveling on the north side of the road, on SRP-owned property. When the line intersects with N Fuqua Road, it will turn south on private property, traveling on the west side of the road, to SRP-owned property, until it reaches the intersection with Highway 84. The line will turn west along Highway 84 and travel for approximately 0.5 miles before it turns south to enter the Solar Collector Substation.

Summary of Public Process

SRP conducted a public process comprised of numerous outreach activities to gain input and feedback concerning the Project, as described in detail in **Exhibit J** of this Application. The outreach process informed the public, public officials, jurisdictional agencies, customers and stakeholders of the Project. The process included briefings and meetings, live online open houses, in-person open houses, postcard mailings, phone calls and emails. In addition, social media was used to inform the public and stakeholders. A toll-free information line and Energy Center website were established to provide the public with information about the project and an opportunity to provide comments.

The Energy Center public process consisted of three phases. In each phase, SRP employed various methods of outreach to inform the public of the Energy Center and solicit feedback. The process ultimately informed SRP's decision on the location of the transmission line route. The public process, and the criteria and analysis utilized to determine the Proposed Route, is more fully described in **Exhibit J**. As further described in **Exhibit J**, the Proposed Route maximizes the use of SRP owned property, minimizes the impacts to privately owned properties, and is the shortest distance between the Marigold Substation and the collector substations.

Summary of Environmental Analysis

In support of this Application, SRP performed various studies that analyzed the impact of the Transmission Line Project under the factors identified in A.R.S. § 40-360.06 (Environmental Factors). The following provides a summary of the conclusions reached regarding the compatibility of the Transmission Line Project under the Environmental Factors:

- No significant or detrimental effects to fish, wildlife, plant life and associated forms of life upon which they are dependent.
- No significant or detrimental effects associated with noise emission levels and interference with communication signals.
- Neither SRP nor jurisdictional agencies have any plans for future development of recreational facilities associated with the Project.
- Project implementation will be consistent with safety considerations and regulations.
- No significant or detrimental effects to existing scenic areas, historic sites, structures or archaeological sites at or in the vicinity of the Project.
- No significant or detrimental effects to surface water or groundwater quality and availability.
- The Project is environmentally compatible with the total environment of the area.

Conclusion

The Marigold Energy Center will support electric demand in Pinal and Maricopa Counties. The Transmission Line Project is needed to interconnect the solar generation and BESS elements of the Energy Center to the electrical grid, while also providing an opportunity to create future transmission interconnections in the area. The Transmission Line Project is being constructed almost entirely on land owned by SRP which results in minimal community and private property impacts. In developing the Transmission Line Project, SRP sought and incorporated feedback gained from the public and other stakeholders. The Project is environmentally compatible.

Accordingly, SRP requests that the Arizona Power Plant and Transmission Line Siting Committee grant and that the ACC approve a CEC for the Transmission Line Project.

APPLICATION

In accordance with Arizona Revised Statutes (A.R.S.) §§ 40-360.03 and 40-360.06 and Arizona Administrative Code R14-7-119, the Applicant provides the following information:

1. *Name and address of the Applicant*

Name: Salt River Project Agricultural Improvement and Power District (SRP)
Address: 1500 North Mill Avenue
Tempe, AZ 85281-1298

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: Bill McClellan
Director Resource Planning, Acquisition and Development
Address: PO Box 52025, PAB349
Phoenix, AZ 85072-2025
Telephone: (602) 236-5387
Email: Bill.McClellan@srpnet.com

3. *State each date on which the applicant has filed a ten-year plan in compliance with A.R.S. § 40-360.02 and designate each such filing in which the facilities for which this application is made were described. If they have not been previously described in a ten-year plan, state the reasons therefore.*

In accordance with A.R.S. § 40-360.02, SRP has filed Ten-Year Plans annually with the Arizona Corporation Commission (ACC). The Marigold Energy Center Project (Energy Center) was included in the most recent Ten-Year Plan SRP submitted to the ACC on January 29, 2026.

4. *Description of the proposed facilities, including:*

4.1 *Description of electric generating plant:*

Not Applicable.

4.2 *Description of the proposed transmission lines.*

This Application requests a CEC for two 230 kV double-circuit transmission lines that will connect the Marigold Substation to the BESS Collector Substation and the Solar Collector Substation (Transmission Lines or Transmission Line Project). SRP plans to construct the approximately 4.5 mile Transmission Lines between the Marigold Substation and the Solar and BESS Collector Substations. As noted below, the Transmission Line Project also requires two short 500 kV transmission lines between the Marigold Substation to the existing Duke – Pinal Central 500 kV Transmission Line. The two 500 kV transmission lines do not require a CEC.

4.2.1 General Description.

4.2.1.1 Nominal voltage for which the lines are designed.

230 kV Transmission Lines

The Transmission Lines are designed for a nominal voltage of 230 kV with potential to underbuild 69 kV on the same structure and may be utilized by ED3 depending on their future transmission infrastructure needs. However, the 69 kV lines are not part of this Application.

Non-Jurisdictional 500 kV transmission lines.

The existing 500 kV double-circuit transmission line that runs east of the Marigold Substation site, the Duke – Pinal Central transmission line, will be looped in and out of the new Marigold Substation. The two 500 kV transmission lines are less than a mile in length and therefore not jurisdictional nor subject to this CEC Application.

4.2.1.2 Description of proposed structures.

SRP proposes to use single shaft tubular steel pole structures (poles) for the Transmission Lines.

4.2.1.3 Description of proposed switchyards and substations.

The Applicant will construct a 500/230 kV substation (Marigold Substation); however, the Marigold Substation is not part of this CEC Application.

4.2.1.4 Purpose for constructing proposed transmission lines.

The purpose of the Transmission Lines is to connect the 600 MW solar and 400 MW battery components of the Energy Center to the bulk electric system, which is essential to respond to anticipated growth in SRP's service area, particularly in Pinal County, to increase system reliability and to enable the addition of variable renewable resources onto the SRP system.

4.2.2 General Location.

4.2.2.1 Description of geographical points between which the transmission line will run.

The Transmission Lines are two separate 230 kV double-circuit transmission lines that will connect the Marigold Substation to both the BESS Collector Substation and the Solar Collector Substation. The new Marigold Substation is located on SRP owned property, approximately 0.25 miles south of W Barnes Road. The site is

bordered on the west by N Stanfield Road and on the east by the Santa Rosa Wash.

The BESS Collector Substation is on the west side of N Stanfield Road, approximately 0.9 miles south of the Marigold Substation.

The Solar Collector Substation is south of Highway 84, approximately halfway between N Fuqua Road and N White and Parker Road.

4.2.2.2 *Straight-line distance between such geographic points.*

Transmission Line 1. The straight-line distance from the Marigold Substation to the BESS Collector Substation is approximately one (1) mile.

Transmission Line 2. The straight-line distance from the Marigold Substation to the Solar Collector Substation is approximately 3.3 miles.

4.2.2.3 *Length of the transmission line for each alternative route.*

Transmission Line 1. The transmission line interconnecting the Marigold Substation to the BESS Collector Substation is approximately 1.2 miles in length.

Transmission Line 2. The transmission line interconnecting the Marigold Substation to the Solar Collector Substation is approximately 4.4 miles in length.

4.2.3 *Detailed Dimensions.*

4.2.3.1 *Nominal width of right-of-way (ROW) required.*

Where two new 230 kV double-circuit transmission lines are running in parallel, a single ROW of 280 feet is needed.

Where a single 230 kV double-circuit transmission line is proposed, a 140-foot ROW is needed.

SRP anticipates future generation projects may interconnect at the Marigold Substation. Accordingly, SRP is proposing a 500-foot-wide corridor where the Transmission Lines are running in parallel, and a 350-foot-wide corridor where a single double-circuit transmission line will be located. A wider corridor will support network expansion, allow SRP flexibility to locate the Transmission Lines most optimally as the Energy Center and other projects develop, and reduce the risk of the Transmission Lines impeding future projects accessing the Marigold Substation.

4.2.2.2 Nominal length of span.

While the nominal length of span may vary from 200 to 900 feet, 800-foot span lengths are typical.

4.2.2.3 Maximum height of supporting structures.

The nominal height of the proposed structures will be 100 to 185 feet. The maximum height of the proposed structures will not exceed 199 feet.

4.2.2.4 Minimum height of conductor above ground.

The minimum height of the 230 kV conductor above existing grade will be 25.5 feet. The average lowest height of 230 kV conductor will be approximately 50 feet.

4.2.4 To the extent available, estimate costs of proposed transmission line and site, stated separately. (If application contains alternative routes, furnish an estimate for each route and a brief description of the reasons for any variations in such estimates.)

Proposed transmission lines: approximately \$27,000,000
Proposed site: approximately \$1,800,000

4.2.5 Description of proposed route and substation locations.

The Transmission Lines will connect to the new Marigold Substation. The substation is located on SRP owned property approximately 0.25 miles south of W Barnes Road and is bordered by N Stanfield Road on the west and the Santa Rosa Wash on the east.

Transmission Line 1– Marigold Substation to BESS Collector Substation. A new 230 kV double-circuit transmission line will connect the new Marigold Substation to the BESS Collector Substation. The transmission line to the BESS Collector Substation will exit the Marigold Substation to the west, approximately 0.25 miles south of W Barnes Road and turn to the south, parallel to N Stanfield Road. The line will travel along N Stanfield Road for approximately 0.9 miles before turning west into the BESS Collector Substation.

Transmission Line 2 – Marigold Substation to Solar Collector Substation. A new 230 kV double-circuit transmission line will travel from the Marigold Substation to the Solar Collector Substation. Transmission Line 2 will exit the Marigold Substation turning south along N Stanfield Road, sharing a corridor with Transmission Line 1 up to the point it turns west to enter the BESS Collector Substation. From that point Transmission Line 2 will continue south until it meets W Clayton Road and then turn west, traveling on the north side of the road, on SRP owned property. When Transmission Line 1 intersects N Fuqua Road, it will turn south, traveling on the west side of the road, on SRP owned property,

until it reaches the intersection with Highway 84. The line will turn west along Highway 84 and travel for approximately 0.5 miles before it turns south to enter the Solar Collector Substation.

4.2.6 Land Ownership.

The Transmission Lines will be sited primarily on SRP-owned land, with some ROW on private land.

5 Jurisdiction.

5.1 Areas of jurisdiction (as defined in A.R.S. Section 40-360) affected by this route.

The Transmission Project will be constructed on private and SRP-owned land within Pinal County, west of the community of Stanfield.

5.2 Designation for proposed sites or routes, if any, which are contrary to the zoning ordinances or master plans of affected areas of jurisdiction.

Not Applicable.

6 Description of the environmental studies the Applicant has performed or intends to perform.

KP Environmental, Inc. (KPE) has conducted or reviewed environmental studies, including field studies and routing and siting analyses, to support this Application. Potential environmental effects of construction and implementation of the Transmission Lines are included in the exhibits to this Application.

7 Rationale for route selection/preference.

The rationale for the siting of the Transmission Lines was developed and supported by system planning, customer needs, load growth and environmental studies. Advantages of the proposed route for the Transmission Line Project include the following:

- The new Marigold Substation is adjacent to the existing 500 kV Duke – Pinal Central transmission line, minimizing the need for a lengthy 500 kV interconnection line and additional impacts on private property.
- The proposed route of the two 230 kV double-circuit transmission lines maximizes the use of SRP-owned land for ROW use, minimizing the impact to private lands.
- In selecting the Proposed Route of the Transmission Lines, SRP has sought to balance and minimize the impacts of these project elements. Exhibit J describes the justification for the proposed transmission route.

Based on the information provided herein, SRP hereby affirms, upon thorough expert environmental evaluation and analysis, that the Marigold Transmission Project – the two double-circuit 230kV Transmission Lines – are environmentally compatible. SRP

therefore respectfully requests the Arizona Power Plant and Transmission Line Siting Committee grant SRP a CEC for the Project and that the Arizona Corporation Commission approve the CEC as meeting the factors of A.R.S. § 40-360.06

By: _____
Bill McClellan

Signed by:
William S. McClellan
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EXHIBIT A PROJECT LOCATION AND LAND USE

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

Where commercially available, a topographic map, 1:250,000 scale, showing any proposed transmission line route of more than 50 miles in length and the adjacent area. For routes of less than 50 miles in length, use a scale of 1:62,500. If application is made for alternative transmission line routes, all routes may be shown on the same map, if practicable, designated by applicant's order of preference.

Where commercially available, a topographic map, 1:62,500 scale, of each proposed transmission line route of more than 50 miles in length showing that portion of the route within two miles of any subdivided area. The general land use plan within the area shall be shown on a 1:62,500 map, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay.

Project Location

Figure A-1 depicts the proposed Marigold Transmission Project (Transmission Line Project), jurisdictional land ownership, and the adjacent area within a 20-mile buffer on a topographic map (1:250,000 scale).

Figure A-2 depicts the Project including a two-mile buffer of the Project site, jurisdictional land ownership, and the adjacent area on a topographic map (1:62,500 scale).

Figure A-3 depicts the Pinal County Comprehensive Plan designated Land Use within a two-mile buffer of the Project on a topographic map (1:62,500 scale).

Figure A-4 depicts the Pinal County designated Zoning Districts within a two-mile buffer.

Land Ownership

Salt River Project Agricultural Improvement and Power District (SRP), under Arizona Revised Statutes (A.R.S.) § 40-360 *et seq.*, submits this application (Application) for a Certificate of Environmental Compatibility (CEC) for two 230 kV double-circuit transmission lines (Transmission Lines) comprising approximately 4.5 miles of transmission line right of way. The Transmission Lines are part of the Marigold Energy Center Project (Energy Center) which includes the following elements in addition to the Transmission Lines: (1) up to 600 megawatts (MW) of solar photovoltaic generation; (2) a battery energy storage system (BESS) that has a capacity of 400 MW and can store up to 3,200 megawatt-hours (MWh) of energy; (3) a new 500/230 kV substation (Marigold Substation); (4) a 675 MW three unit natural gas-fired power plant; (5) two short 230 kV gen-tie lines connecting the thermal generation plant to the Marigold Substation; and (6) two short 500 kV transmission lines interconnecting the Marigold Substation to the 500 kV Duke – Pinal Central transmission line as the Energy Center's connection to the regional grid. The

Transmission Lines will connect the Energy Center's solar generation site and BESS to the Marigold Substation. The existing 500 kV double circuit Duke – Pinal Central Transmission Line would connect into the Marigold Substation, which will serve as the Energy Center's connection to the regional grid. Although the Application provides general information for the overall Energy Center as shown in **Figure 1**, the solar generation, BESS, the Marigold Substation, and the short 230 kV and 500 kV transmission lines are not under the jurisdiction of the Arizona Corporation Commission (ACC) and are not part of this Application.

The proposed route for the approximately 4.5-mile 230 kV double-circuit Transmission Lines included in this CEC is described as a single proposed route because it is the intent to co-locate the Transmission Lines in a single corridor when they are running parallel. The route is located on SRP-owned property for as much of the transmission routing as is feasible to reduce impacts to privately-owned parcels. The proposed route includes two individual 230 kV double circuit transmission lines from the new Marigold Substation – one to the BESS Collector Substation and one to the Solar Collector Substation.

One 230 kV double circuit transmission line will interconnect the Marigold Substation to the BESS Collector Substation (Transmission Line 1). Transmission Line 1 will exit the Marigold Substation heading west, approximately 0.25 miles south of W Barnes Road, then turn south to travel along N Stanfield Road. There would be a 0.5 mile segment of ROW on private property along N Stanfield Road until the line can be sited on the west side of the road on SRP-owned property, traveling an additional 0.4 miles. At this point, the line will turn west to enter the BESS Collector Substation.

A second 230 kV double circuit transmission line will interconnect the Marigold Substation to the Solar Collector Substation south of Highway 84 (Transmission Line 2). Transmission Line 2 will exit the Marigold Substation and turn south along N Stanfield Road, sharing a corridor with Transmission Line 1 up to the point it turns west to enter the BESS Collector Substation. From that point, Transmission Line 2 will continue south until it meets W Clayton Road and then turn west, traveling on the north side of the road, on SRP-owned property. When Transmission Line 2 intersects N Fuqua Road it will turn south on private property, traveling on the west side of the road, on SRP-owned property, until it reaches the intersection with Highway 84. Transmission Line 2 will turn west along Highway 84 and travel for approximately 0.5 miles before it turns south to enter the Solar Collector Substation.

The surrounding area land ownership within 20 miles consists of private parcels in Pinal County, Gila River Indian Community (GRIC) Tribal land, Tohono O'odham Nation Tribal land, Ak-Chin Indian Community Land, Bureau of Land Management (BLM) jurisdiction, state-owned parcels, Department of Defense Land, the City of Maricopa Land, the City of Casa Grande Land and Federal Wilderness Areas (see **Figures A-1** and **A-2**). The Energy Center area includes many existing linear features including highway corridors, roadways, electric transmission lines, and hydraulic features.

Land Use

Pinal County

Pinal County is located in the south-central area of the State of Arizona and encompasses approximately 5,376 square miles. Pinal County is bordered by Maricopa County to the north and west, Pima County to the south, Graham County to the east, and Gila County to the northeast. Within Pinal County there are five incorporated cities and eight incorporated towns. The city of Maricopa is northeast of the site, the City of Casa Grande is east of the site, and the unincorporated community of Stanfield is just east of the site.

The Pinal County Comprehensive Plan is the current planning guide for developments within the county. The Pinal County Comprehensive Plan “is the landmark document that will serve to steer the County on a positive course of action to manage growth, preserve the quality of life, and promote sustainability. It is a long-term vision that promotes effective economic vitality while ensuring environmental stewardship” (Pinal County, 2019).

The land use categories depicted in **Figure A-3** show the designated land uses from the Pinal County Comprehensive Plan. The designated land uses within two miles of the project include Employment, Moderate Low Density Residential (1-3.5 du/ac), Medium Density Residential (3.5-8 du/ac), Mid Intensity Activity Center, and High Intensity Activity Center.

Land use designations crossed by the route include High Intensity Activity Center, Moderate Low Density Residential (1-3.5 du/ac) and Employment.

Zoning

Pinal County

Pinal County is classified into zoning districts and Planned Area Development (PAD) overlay district zones. As depicted on **Figure A-4**, the zoning districts within two miles of the Project include the following:

- CB-1 – Local Business Zone
- CB-2 – General Business Zone
- CI-1 – Light Industry and Warehouse Zone
- CI-2 – Industrial Zoning District
- CR-2 – Single Residence Zone
- CR-3 – Single Residence Zone
- CR-5 – Multiple Residence Zone
- GR – General Rural

- MR – Multiple Residence Zoning District
- SR – Suburban Ranch Zone
- TR – Transitional Zone

Pinal County zoning districts crossed by the route include GR (General Rural), CR-3 (Single Residence Zone) and CB-2 (General Business Zone).

Potential Effects

The Project is in the western portion of Pinal County, west of the community of Stanfield. The Transmission Lines would be predominantly located on SRP-owned property. The Transmission Lines cross land use designations including High Intensity Activity Center, Moderate Low Density Residential (1-3.5 du/ac) and Employment. The zoning districts crossed in Pinal County are GR (General Rural), CB-2 (General Business Zone) and CR-3 (Single Residence Zone).

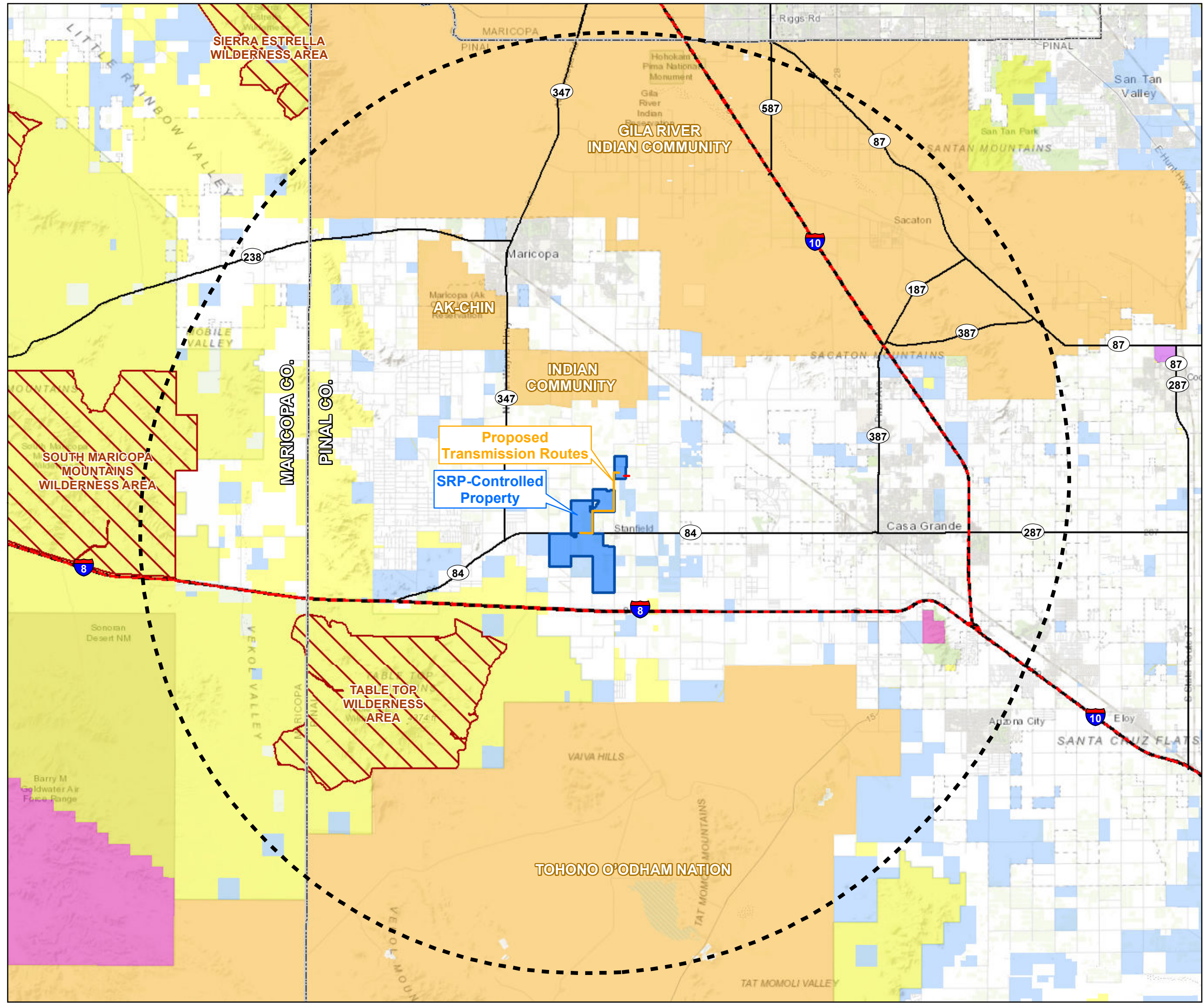
The proposed route includes the Transmission Lines on two side-by-side structures in a single right-of-way, predominantly located on SRP-owned property. While the Project would introduce new overhead transmission structures into the landscape, the future land uses and zoning of the Project area are expected to be retained for their designated purposes (see **Figure A-4**). The Project is near existing transportation and utility infrastructure and Pinal County zoning expressly permits “transmission lines ... for electricity ... in any zoning district[.]” (Pinal County Development Services Code, Chapter 2.150.010(A)). Therefore, the Project is compatible with the County plans for the surrounding area and would result in negligible impacts to future land use plans.

References

Pinal County. 2019. Pinal County Comprehensive Plan. Accessed 5/28/2026. Available at: <https://www.pinal.gov/DocumentCenter/View/25289/Comprehensive-Plan-Document-2019-PDF>

Pinal County. 2026. Pinal County Developmental Services Code. Accessed 5/28/2026. Available at: https://library.municode.com/az/pinal_county/codes/development_services_code_and_floodplain_management?nodeId=PICODESECO

Pinal County. 2026. Planning Division. Accessed 5/28/2026 Available at: <https://www.pinal.gov/226/Planning>



Legend

CEC Jurisdictional Project Components

- Proposed Transmission Routes
- 20-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

- Proposed 500kV Connection
- SRP-Controlled Property

General Features

- Interstate
- State Highway
- County Boundary
- Federal Wilderness Area

Jurisdictional Land Ownership

- Bureau of Land Management Land
- Department of Defense Land
- National Park Service Land
- Indian Land
- State Land
- Private Land (No Shading)

0 2 4 6 8 10
Miles

ARIZONA

Phoenix
Florence
Pinal County

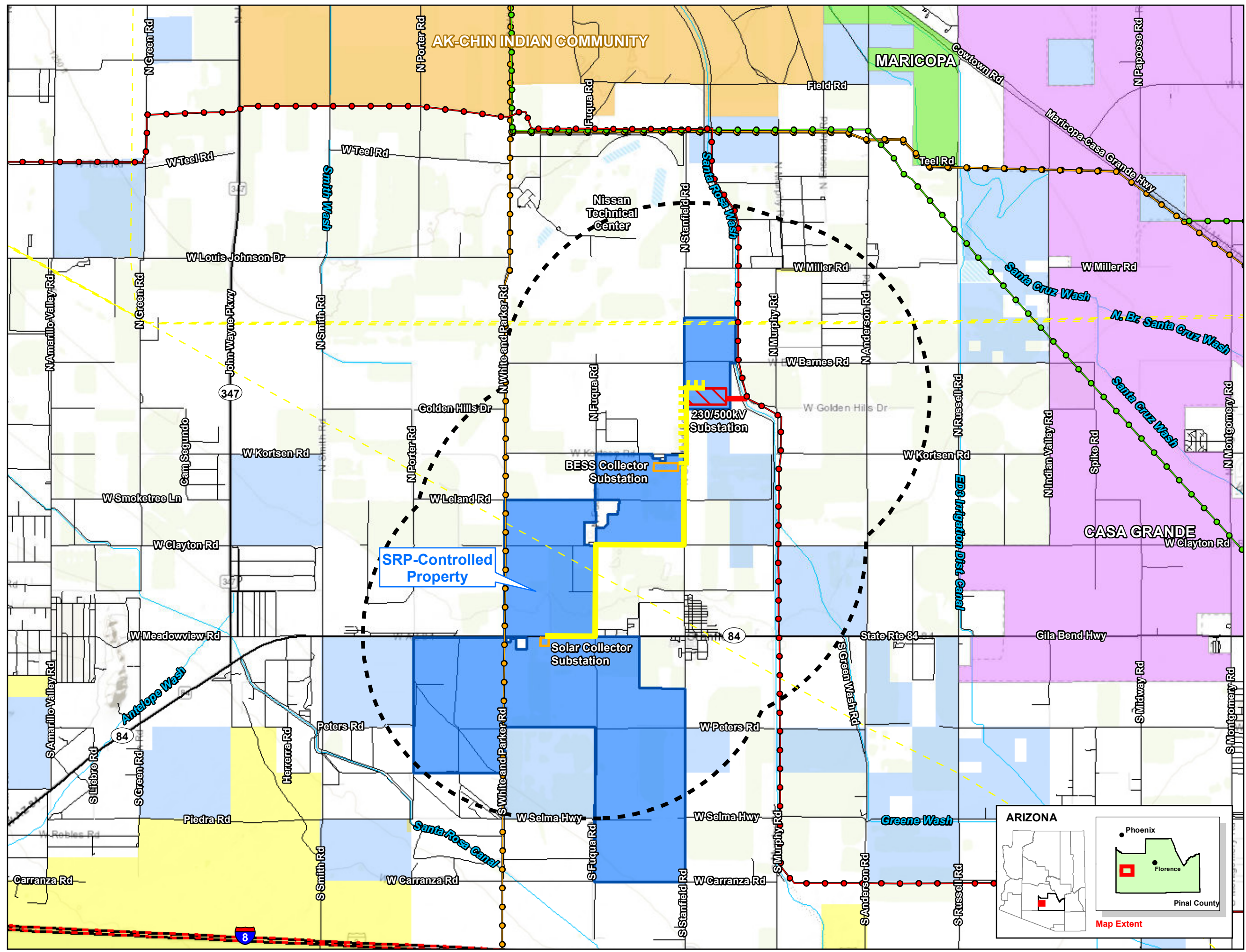
Map Extent

SRP PROJECT MARIGOLD

**FIGURE A-1
JURISDICTION**

Map Extent: Pinal County, AZ

Date: 8.10.26	Author: SJW
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Legend

CEC Jurisdictional Project Components

- Transmission Line 1 – Double Circuit 230 kV
- Transmission Line 2 – Double Circuit 230 kV
- 2-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

- Proposed 500kV Connection
- Collector Substation Location
- 230/500 kV Substation Location
- SRP-Controlled Property

General Features

- 500 kV Transmission Line
- 230 kV Transmission Line
- 115 kV Transmission Line
- Natural Gas Pipeline
- Interstate
- State Highway
- Road
- Major Stream / Wash / Canal

Jurisdiction

- Bureau of Land Management Land
- Indian Land
- State Land
- City of Casa Grande
- City of Maricopa

0 0.5 1 1.5 2 Miles

SRP

SRP PROJECT MARIGOLD

FIGURE A-2 JURISDICTION

Map Extent: Pinal County, AZ

Date: 8.10.26 Author: SJW

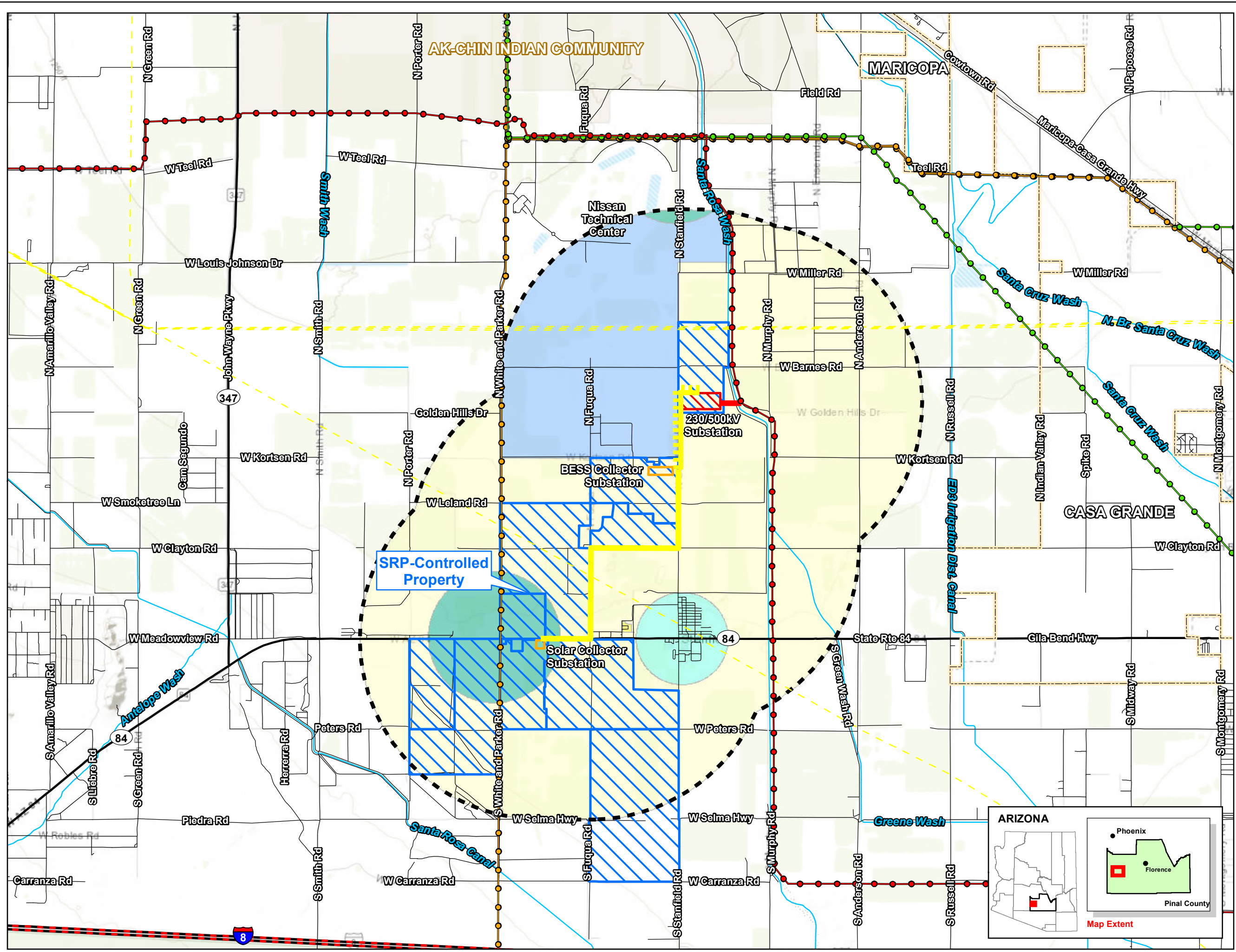
ARIZONA

Phoenix

Florence

Pinal County

Map Extent



Legend

CEC Jurisdictional Project Components

Transmission Line 1 – Double Circuit 230 kV

Transmission Line 2 – Double Circuit 230 kV

2-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

Proposed 500kV Connection

Collector Substation Location

230/500 kV Substation Location

SRP-Controlled Property

Pinal County Proposed LandUse Designation

Employment

Moderate Low Density Residential (1-3.5 du/ac)

Medium Density Residential (3.5-8 du/ac)

Mid Intensity Activity Center

High Intensity Activity Center

General Features

500 kV Transmission Line

230 kV Transmission Line

115 kV Transmission Line

Natural Gas Pipeline

Interstate

State Highway

Road

Major Stream / Wash / Canal

Municipal Boundary

0

0.5

1

1.5

2

Miles

SRP

SRP PROJECT MARIGOLD

**FIGURE A-3
PROPOSED LAND USE DESIGNATION**

Map Extent: Pinal County, AZ

Date: 8.10.26

Author: SJW

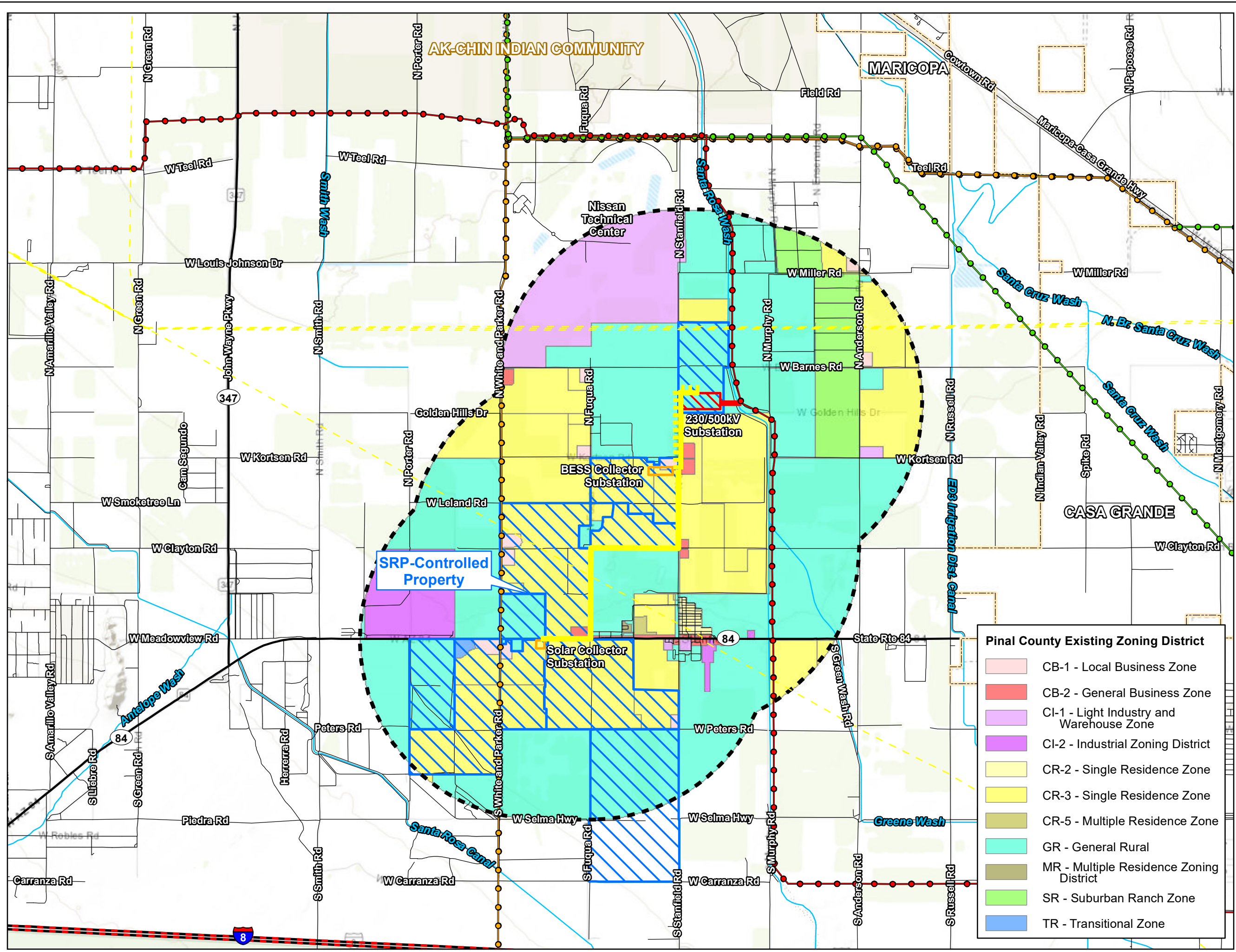
ARIZONA

Phoenix

Florence

Pinal County

Map Extent



Legend

CEC Jurisdictional Project Components

- Transmission Line 1 – Double Circuit 230 kV
- Transmission Line 2 – Double Circuit 230 kV
- 2-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

- Proposed 500kV Connection
- Collector Substation Location
- 230/500 kV Substation Location
- SRP-Controlled Property

General Features

- 500 kV Transmission Line
- 230 kV Transmission Line
- 115 kV Transmission Line
- Natural Gas Pipeline
- Interstate
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

Pinal County Existing Zoning District

- CB-1 - Local Business Zone
- CB-2 - General Business Zone
- CI-1 - Light Industry and Warehouse Zone
- CI-2 - Industrial Zoning District
- CR-2 - Single Residence Zone
- CR-3 - Single Residence Zone
- CR-5 - Multiple Residence Zone
- GR - General Rural
- MR - Multiple Residence Zoning District
- SR - Suburban Ranch Zone
- TR - Transitional Zone

Map Extent

0 0.5 1 1.5 2 Miles

ARIZONA

Phoenix

Florence

Pinal County

SRP

SRP PROJECT MARIGOLD

FIGURE A-4

EXISTING ZONING

Map Extent: Pinal County, AZ

Date: 8.10.26 Author: SJW

EXHIBIT B
ENVIRONMENTAL STUDIES

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

Attach any environmental studies which applicant has made or obtained in connection with the proposed site(s) or route(s). If an environmental report has been prepared for any federal agency or if a federal agency has prepared an environmental statement pursuant to Section 102 of the National Environmental Policy Act, a copy shall be included as part of this exhibit.

The results of the environmental studies associated with the portions of the proposed Marigold Transmission Project (Transmission Line Project) that are the subject of this Application are discussed in previous and subsequent exhibits: **Exhibit A** describes land use; **Exhibit C** addresses potential impacts to sensitive biological resources; **Exhibit D** discusses potential impacts to other biological resources; **Exhibit E** summarizes the potential effects on the area's scenic quality and cultural resources; **Exhibit F** summarizes the potential effects on recreation resources; **Exhibit H** describes how the Transmission Line Project could affect existing local plans; and **Exhibit I** discusses the noise and communication impacts that are expected.

There is no federal action associated with this project that will require National Environmental Policy Act (NEPA) documents to be developed for this Application.

EXHIBIT C
AREAS OF BIOLOGICAL WEALTH

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

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

Introduction

Areas of biological wealth and the rare and endangered species that may occur at or in the vicinity of the proposed Marigold Transmission Project (Transmission Line Project) were identified through a biotic resource review conducted by KP Environmental, Inc. (KPE). The data sources consulted for the review include:

- Topographical and aerial maps and land use, land cover, and elevation data.
- The U.S. Fish and Wildlife Service (USFWS) species list for the Transmission Line Project area obtained from the USFWS online Information for Planning and Consultation (IPaC) system (**Exhibit C-1**) (USFWS, 2026).
- Species information obtained from the USFWS Environmental Conservation Online System, the USFWS Arizona Ecological Services document library, the Arizona Game and Fish Department (AGFD) Online Environmental Review Tool (**Exhibit C-2**).
- AGFD Review of the Energy Center (**Exhibit C-3**).

The AGFD Online Environmental Review Tool database query establishes a buffer beyond the Transmission Line Project to search for occurrence records and the presence of modeled habitat (AGFD 2024a). The size of the buffer depends on the type of project being considered. For the anticipated work areas for this project, the buffer is three miles beyond the Transmission Line Project as defined by the AGFD Online Environmental Review Tool.

In addition, an Ironwood Consulting, A Spheros Company (Ironwood) biologist with expertise in the biology of flora and fauna of the region completed an on-ground habitat assessment along the Transmission Line Project routes. All plant and wildlife species observed in the proposed 230 kV Right-of-Way plus an additional buffer area of 500 feet on each side (Project Area) during the surveys on May 16, 2026 were recorded (see **Exhibit D** for a complete list). The site was assessed to determine if habitat features for species protected under the federal, state, or local regulations were present in the Project Area and its vicinity.

Laws and Policies

Applicable laws and policies regarding special-status species in Arizona include the following.

The USFWS administers the following federal laws and associated regulations:

- The USFWS administers the Endangered Species Act (ESA) of 1973, as amended. The ESA protects wildlife species listed as threatened or endangered from “take” (generally, intentional or unintentional harm or harassment of a listed species). However, the ESA does not provide the same take protections for listed plant species, except on federal land. The ESA also allows for the designation of critical habitat for listed species, although designation of critical habitat is not required. Critical habitat is an administrative designation of a defined area with specific characteristics important to the survival and recovery of a listed species. Designation of critical habitat can affect federal actions but not state or private actions unless there is a federal nexus.
- The Migratory Bird Treaty Act (MBTA) provides for the protection of migratory birds and prohibits their unlawful take or possession. The act bans “taking” any native birds; “taking” can mean killing a wild bird or possessing parts of a wild bird, including feathers, nests, or eggs. Exceptions are allowed for hunting game birds and for research purposes, both of which require permits.
- The Bald and Golden Eagle Protection Act (BGEPA) prohibits any form of possession or taking of bald eagles (*Haliaeetus leucocephalus*) or golden eagles (*Aquila chrysaetos*). The act prohibits the “take” of bald and golden eagles; “taking” includes disturbing eagles, which means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment by substantially interfering with normal breeding, feeding, or sheltering behavior.

The AGFD manages and conserves wildlife in Arizona. Nearly all take of wildlife is regulated in some manner through the hunting and fishing license system. Arizona does not have a counterpart to the federal ESA, but a list of rare species (Wildlife of Special Concern [WSC]) was created in 1996, based on ESA candidate species, without creating any specific statutory protections for those species. The WSC status is no longer a valid category because they were former but no longer candidate species under the ESA; however, the AGFD continues to track these species due to an existing memorandum of understanding between the USFWS and AGFD. Generally, no hunting or capture of WSC species is allowed, with some exceptions for managed recreational fisheries of native fish and recreational capture of certain reptiles.

Arizona prepared a Comprehensive Wildlife Conservation Strategy in 2006 (AGFD, 2006), later renamed the State Wildlife Action Plan (SWAP), through a state–federal partnership

and grant program. The SWAP was updated in 2022 (AGFD, 2022) and is now called the Arizona Wildlife Conservation Strategy (AWCS), making minor refinements to SWAP criteria to provide clarity. The AWCS identifies Species of Greatest Conservation Need (SGCN) in several tiers. SGCN was scored on the following seven criteria: Extirpated Status, Federal or Legal Status, Declining Status, Disjunct Status, Demographic Status, Concentration Status, and Distribution Status. Tier 1 species were deemed vulnerable in at least one of the previous categories and is at least one of the following: federally listed as endangered or threatened under the ESA, recently removed from ESA and currently requires post-delisting monitoring, specifically covered under a signed conservation agreement such as Candidate Conservation Agreement (CCA) or a Candidate Conservation Agreement with Assurances (CCAA) or a Conservation Strategy and Assessment or Strategic Conservation Plan, or a closed season species (i.e., no take permitted) as identified in AGFD Orders 40, 41, 42 or 43 (AGFD, 2022). Tier 2 species were deemed vulnerable in at least one of the seven criteria listed above but matched none of the additional criteria also listed above. Tier 3 species have “unknown status” in at least one of the seven criteria listed above. These species have no assessed status and thus represent priority research and information needs. With more information on these species, their status is likely to change.

Native plants in Arizona are managed by the Arizona Department of Agriculture (ADA), which regulates harvest, salvage, and transport of plants. Harvest or salvage of most plant species may be permitted or required, and fees may be assessed on Arizona State Land Department (ASLD) State Trust Land (State Land). Plants listed in the Highly Safeguarded category may only be taken or salvaged for scientific or conservation purposes.

The ADA administers the state noxious weed law under Arizona Administrative Code R3-4-245.

Inventory

An Ironwood biologist surveyed the Project Area on May 16, 2026. The biologist documented existing conditions and noted any habitat features that may be important to special-status species or related to areas of biological wealth within the Project Area.

The USFWS IPaC database was queried on April 13, 2026, to generate an unofficial list of ESA-listed species that have the potential to occur in the Project Area (USFWS, 2026d) (**Exhibit C-1**), see **Table C-1**. In addition, the AGFD Online Environmental Review Tool was queried on April 13, 2026 to generate a list of special-status species with records within three miles of the Project Area and a list of SGCN with modeled suitable habitat within five miles of the Project Area, see **Table C-2** (AGFD, 2026a) (**Exhibit C-2**).

Summary of Occurrence

The USFWS and AGFD identified several rare, endangered, threatened, and other special-status species that are known to occur or could occur in the region (i.e., along the Transmission Line Project routes for USFWS and within a five-mile buffer of the Project Area for AGFD). These protected areas, special-status species, and their likelihood of being

present in the vicinity of the proposed Transmission Line Project are addressed below in four sections: 1) Areas of Biological Wealth 2) Federally Listed Threatened and Endangered Species, 3) Other Special Status-Species, and 4) Protected Native Plants (AGFD, 2026a; USFWS, 2026d).

Areas of Biological Wealth

There are no designated or proposed critical habitats within the Project Area (USFWS, 2026d).

The Gila River to Lake St. Clarie Pinal County Wildlife Movement area crosses the northern section of the Project Area. This wildlife movement area was identified in the AGFD report; however, based on review of aerial imagery, topographic maps and existing land use this area does not support riparian vegetation, and shows evidence of disturbance from agricultural practices.

Additional Pinal County Riparian Areas are mapped within three miles of the Project Area (AGFD, 2026a). This riparian category was developed to provide planners and other project proponents with the information to identify opportunities to protect riparian areas, open spaces, and other natural resources throughout Pinal County and the surrounding areas (AGFD and Pinal County, 2019). No native riparian areas were observed within the Project Area during field surveys (see **Exhibit D**). The entirety of mapped riparian habitat within the immediate Project Area is currently utilized by agricultural operations and development. There is a small row of trees on the parcel south of West Clayton Road that appears to be left as a windbreak to the rest of the disturbed/cleared parcel. These trees may provide refuge or stopover habitat for species crossing the surrounding agricultural land.

The closest Important Bird Area (IBA), the Lower Salt and Gila Rivers Ecosystem IBA, is approximately 35 miles northwest of the Transmission Line Project (Audubon, 2026). The habitat assessment survey determined there are no wetlands, native riparian areas nor IBAs located within or adjacent to the Project.

Federally Listed Threatened and Endangered Species

The USFWS IPaC identified five wildlife species protected under the ESA and one ESA candidate invertebrate species (USFWS, 2026d). The species' federal status and potential for occurrence in the vicinity of the Transmission Line Project are presented in **Table C-1**.

Marigold Transmission Project

Table C-1 USFWS-Listed Species			
Species		USFWS Protection Status	Occurrence Status (Justification)
Common name	Scientific name		
Mammals			
Sonoran Pronghorn	<i>Antilocapra americana sonoriensis</i>	Experimental Population, Non-essential	No potential to occur. Though this species has occurrence records within five miles of the Transmission Line Project (AGFD 2026a), suitable desert habitat is not present within the Project Area. The Project Area is unlikely to be used for breeding or foraging due to the scarcity of native grassland and proximity to developed areas and highways. It was not observed during the field assessment.
Birds			
Cactus Ferruginous Pygmy-Owl	<i>Glaucidium brasilianum cactorum</i>	Threatened	No potential to occur. Suitable cottonwood-mesquite riparian areas and Sonoran desertscrub habitat do not occur within the Project Area. The Project Area is unlikely to be used for breeding and nesting due to the absence of Saguaro cacti and other suitable nesting substrates. This species did not have occurrence records within three miles of the Transmission Line Project (AGFD 2026a) and was not observed during the field assessment.
Yellow-billed Cuckoo	<i>Coccyzus americanus</i>	Threatened	Unlikely to occur. Suitable riparian habitat for this species is not present in the Project Area. The Project Area is unlikely to be used for breeding, migration or dispersal due to the scarcity of riparian trees. This species did not have occurrence records within three miles of the Transmission Line Project (AGFD 2026a) and was not observed during the field assessment.
Fish			

Table C-1 USFWS-Listed Species			
Species		USFWS Protection Status	Occurrence Status (Justification)
Common name	Scientific name		
Gila Topminnow (incl. Yaqui)	<i>Poeciliopsis occidentalis</i>	Endangered	No potential to occur. There is no suitable aquatic habitat for this species in the Project Area. The Project Area is distant from aquatic resources with habitat to support this species. This species did not have occurrence records within three miles of the Transmission Line Project (AGFD 2026a) and was not observed during the field assessment.
Insects			
Monarch Butterfly	<i>Danaus plexippus</i>	Candidate	May occur. This species may be present as transients during migration or as occasional individuals passing through the Project Area enroute to larval food plants or nectar resources. No milkweed (<i>Asclepias</i>) species were observed within the Project Area for larval use, but nectar sources are available for foraging and migration.

Sonoran Pronghorn

The Sonoran pronghorn is a desert subspecies of pronghorn that lives in dry plains and deserts. In southwestern Arizona, they prefer broad alluvial valleys with granite mountains and mesas that separate them (USFWS, 2024a). Due to the developed nature of the Project Area (the project is completely surrounded by agricultural land), lack of suitable habitat within the Project Area and surrounding areas, the Sonoran pronghorn is unlikely to pass through the Project Area or to use the area for breeding or foraging purposes.

Cactus Ferruginous Pygmy-Owl

In Arizona, cactus ferruginous pygmy-owls typically occur within 1,000 to 4,000 feet elevation. Historically, cactus ferruginous pygmy-owls were documented in cottonwood-mesquite forests and mesquite riparian woodlands along the Gila and Salt Rivers and major tributaries and Sonoran desertscrub. Currently, most cactus ferruginous pygmy-owls are found in Sonoran desertscrub in southern Arizona (USFWS, 2026b). Although the proposed Project Area is within elevation range for this species (just above 1,000 feet), they are not likely to occur in the Project Area for nesting or foraging purposes as there is no Sonoran desertscrub or otherwise suitable habitat for cactus ferruginous pygmy-owls within the Project Area.

Yellow-billed Cuckoo

The yellow-billed cuckoo is primarily found in high quality, desert riparian forest habitat dominated by native tree species, especially cottonwood and willow stands bordered by mesquite forested areas (Johnson, 2009). Yellow-billed cuckoos nest primarily in habitat dominated by native species with multistoried structure and high, dense canopies. Yellow-billed cuckoos tend to prefer nesting areas with lower overall temperature and high humidity, so tall shade trees and open water to increase humidity seem particularly important (USBR, 2008). Cuckoos generally do not use sites with canopy cover that is less than 40 percent, and greater than 65 percent is preferred. No desert riparian woodlands or other vegetated areas with suitable canopy cover exist within the immediate Transmission Line Project vicinity. Therefore, yellow-billed cuckoos are not likely to occur in the Project Area for nesting or foraging purposes.

Gila Topminnow

The Gila topminnow is native to the greater Gila River watershed in Arizona and New Mexico. The typical habitat of Gila topminnow includes shallow warm water, small streams or marginal areas of larger more permanent water sources, constantly flowing springs, marshes (cienegas), and permanent and intermittent streams (Magana et al., 2002). As there are no natural aquatic features (e.g., rivers and streams) within the Project Area, there is no potential for Gila topminnow to occur within the Project Area.

Monarch Butterfly

Significant declines in the population of migrating monarch butterflies have led to widespread concern about this species and the long-term persistence of the North American monarch migration. Augmenting larval feeding and adult nectaring opportunities are part of an international conservation effort for the monarch butterfly. Breeding habitat is characterized by the presence of milkweed species, the monarchs' host plant (Jepson et al. 2015). Suitable breeding habitat does not exist within the Project Area. No milkweed species nor monarch individuals were observed in the Project Area during the habitat assessment survey. There is a low likelihood for monarch individuals to pass through, and due to the disturbed nature of the site and the surrounding areas, it is unlikely that monarch butterflies will deposit eggs within or around the Project Area.

Other Special-Status Species

Other special-status species include the following:

- Eagles protected by the BGEPA.
- Birds of Conservation Concern (BCC), which are bird species, beyond those designated as federally threatened or endangered that represent the USFWS's highest conservation priorities. The relevant BCC for this analysis is those identified by the USFWS (2021) as occurring in Bird Conservation Region (BCR) 33.

- SGCN identified by AGFD’s AWCS, which are species in need of conservation efforts to preclude them from listing under the ESA. Species are scored on the following seven criteria: Extirpated Status, Federal or State Legal Status, Declining Status, Disjunct Status, Demographic Status, Concentration Status, and Distribution Status. Each criteria contains a score from “0” to “2,” with “0” indicating insufficient data, “1” indicating that the vulnerability criterion is met, and “2” indicating that the species does not meet the vulnerability criterion. If a species ranks as “vulnerable” (i.e., score = “1”) under one or more of the seven vulnerability criteria, it was included in the SGCN list. Species were considered to have “unknown status” if there were insufficient data to determine the species’ vulnerability under one or more of the criteria (i.e., if none of the seven criteria were scored as “1,” but one or more of the seven categories scored “0”). Following this initial vulnerability assessment scoring, the resulting SGCN list was further refined into three tiers (AGFD, 2022).
 - Tier 1 species are those deemed vulnerable (scored a “1”) in at least one of the seven categories *and* is either federally listed as endangered or threatened under the ESA, recently removed from the ESA and currently requires post-delisting monitoring, specifically covered under a signed CCA/CCAA/Conservation Strategy and Assessment/Strategic Conservation Plan, or considered to be a closed season species (i.e., no take permitted) as identified in Arizona Game and Fish Commission Orders 40, 41, 42 or 43.
 - Tier 2 species are those deemed vulnerable (scored a “1”) in at least one of the seven categories but matched none of the additional criteria for Tier 1.
 - Tier 3 species are those with “unknown status” in at least one of the seven categories but do not rise to the classification of Tier 2. These species are those for which status is unable to be assessed and, thus, represent priority research and information needs. As more information becomes available, their tier status will be reevaluated (AGFD, 2022).

The species in these categories (other than those also designated as federally threatened or endangered, which are addressed above) have occurrence records or predicted habitat modeled within five miles of the Project Area (AGFD, 2026a) and are discussed and listed below in **Table C-2**, where they are evaluated for potential occurrence based on the results of Project Area surveys, familiarity with the vicinity, and freely available information sources, including the AGFD’s Heritage Data Management System (HDMS) (AGFD, 2026b); the online field guide Reptiles and Amphibians of Arizona (Brennan, 2021); the online field guide All About Birds (Cornell Lab of Ornithology, 2026a); Google Earth (2026); and the Arizona Ecological Services website and document library (USFWS 2026e).

Bald Eagle

Bald Eagle

The southwestern population of bald eagles that reside in Arizona year-round nest primarily along the Salt River and Verde River in central Arizona. Bald eagles typically build their nests within a mile of a body of water, such as a lake, river, or creek, and often place them on cliff edges, rock pinnacles, or cottonwood trees. The Project Area itself includes mostly urbanized development and agricultural land that do not provide suitable nesting habitat for bald eagles. Therefore, the bald eagles are unlikely to nest near the Project Area. There is a low potential the species may occur in the vicinity for foraging purposes (see **Table C-2**). Significant impacts to bald eagles due to Transmission Line Project activities are not expected. This species was not documented by Ironwood during the project-specific habitat assessment in May 2026.

Table C-2				
Other Special-Status Species that May Occur in the Vicinity of the Project				
Species		Protection Status ¹		Potential to Occur in Project Area (Justification) ⁴
Common name	Scientific name	ESA ^{2, 3}	Arizona SGCN ³	
Amphibians				
Lowland Burrowing Treefrog	<i>Smilisca fodiens</i>	--	2	No potential to occur. Lack of suitable aquatic and upland habitat.
Lowland Leopard Frog	<i>Lithobates yavapaiensis</i>	SC	1	No potential to occur. Lack of suitable aquatic and upland habitat.
Sinoloan Narrow-mouthed Toad	<i>Gastrophryne mazatlanensis</i>	SC	2	No potential to occur. Lack of suitable aquatic and upland habitat.
Sonoran Desert Toad	<i>Incilius alvarius</i>	--	2	Low potential to occur. Marginal habitat along the irrigation canals may provide suitable habitat.
Sonoran Green Toad	<i>Anaxyrus retiformis</i>	SC	2	No potential to occur. Lack of suitable aquatic and upland habitat.
Birds				
American Bittern	<i>Botaurus lentiginosus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
American Kestrel	<i>Falco sparverius</i>	--	2	Moderate potential to occur. Can forage in disturbed areas where nearby perch sites can provide a vantage point over open habitat. Can nest in natural or manmade cavities.
American Peregrine Falcon	<i>Falco peregrinus anatum</i>	SC	1	Low potential to occur, but no potential for nesting. This species may hunt over open habitat, but requires steep rocky cliffsides for nesting.
Bald Eagle	<i>Haliaeetus leucocephalus</i>	SC, BGA	1	Low potential to occur, but no potential for nesting. This species may hunt over open habitat but requires steep rocky cliffsides for nesting.

Marigold Transmission Project

Table C-2 Other Special-Status Species that May Occur in the Vicinity of the Project				
Species		Protection Status ¹		Potential to Occur in Project Area (Justification) ⁴
Common name	Scientific name	ESA ^{2, 3}	Arizona SGCN ³	
Bendire's Thrasher	<i>Toxostoma bendirei</i>	BCC	2	Low potential to occur. No suitable desertscrub habitat, but agricultural lands and sparse vegetation between disturbed areas may support transient or migrating individuals.
Brewer's Sparrow	<i>Spizella breweri</i>	--	2	Low potential to occur. No suitable desertscrub or sagebrush habitat, but agricultural lands and sparse vegetation between disturbed areas may support transient, migrating, or wintering individuals
Broad-billed Hummingbird	<i>Cynanthus latirostris</i>	--	2	Low potential to occur. Marginally suitable habitat present within Project Area.
Bullock's Oriole	<i>Icterus bullockii</i>	--	2	Low potential to occur. This species is fairly tolerant to disturbance and can occur along the margins of agricultural habitat especially where trees are present.
Cactus Wren	<i>Campylorhynchus brunneicapillus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Chestnut-collared Longspur	<i>Calcarius ornatus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Costa's Hummingbird	<i>Calypte costae</i>	BCC	2	Low potential to occur. This species requires ample flowering plants to maintain metabolic needs. There may be some flowering species along the margins of the Project Area.
Ferruginous Hawk	<i>Buteo regalis</i>	SC	2	Moderate potential to occur. Will hunt in areas with open habitat including fallow agricultural lands.
Gila Woodpecker	<i>Melanerpes uropygialis</i>	BCC	2	Low potential to occur. This species can tolerate human disturbance and will nest in cavities of trees or cacti.
Gilded Flicker	<i>Colaptes chrysoides</i>	BCC	2	Low potential to occur. This species can tolerate human disturbance and will nest in cavities of trees or cacti.
Golden Eagle	<i>Aquila chrysaetos</i>	BGA	2	Low potential to occur, but no potential for nesting. This species may hunt over open habitat but requires steep rocky cliffsides for nesting.
Gray Flycatcher	<i>Empidonax wrightii</i>	--	2	Low potential to occur. No suitable habitat present in vicinity of Project Area.
Harris's Hawk	<i>Parabuteo unicinctus</i>	--	2	Moderate potential to occur. Will hunt in areas with open habitat including along the margins of fallow agricultural lands.

Table C-2 Other Special-Status Species that May Occur in the Vicinity of the Project				
Species		Protection Status ¹		Potential to Occur in Project Area (Justification) ⁴
Common name	Scientific name	ESA ^{2, 3}	Arizona SGCN ³	
Inca Dove	<i>Columbina inca</i>	--	2	Moderate potential to occur. Tolerant of disturbance and can occur in agricultural lands and landscaped areas.
LeConte's Thrasher	<i>Toxostoma lecontei</i>	BCC	2	Low potential to occur. Marginally suitable habitat present in vicinity of Project Area.
Lincoln's Sparrow	<i>Melospiza lincolnii</i>	--	2	No potential to occur. No suitable habitat present in vicinity of Project Area.
Loggerhead Shrike	<i>Lanius ludovicianus</i>	SC	2	Moderate potential to occur. Tolerant of disturbance and can occur in agricultural lands and landscaped areas.
Mountain Plover	<i>Anarhynchus montanus</i>		2	Moderate potential to occur. The earthen shoulders of the concrete irrigation canals may provide access to water necessary for this species during a stopover site. Additionally, the small ponds and canals within the surrounding habitat may also attract this species to the area.
Prairie Falcon	<i>Falco mexicanus</i>	--	2	Moderate potential to occur. Will hunt in areas with open habitat including fallow agricultural lands.
Sagebrush Sparrow	<i>Artemisiospiza nevadensis</i>		2	No potential to occur. No suitable habitat present in vicinity of Project Area.
Savannah Sparrow	<i>Passerculus sandwichensis</i>	--	2	Low potential to occur. The agricultural habitat within and surrounding the Project Area could potentially support this species.
Sprague's Pipit	<i>Anthus spragueii</i>	SC	2	No potential to occur. No suitable habitat present in vicinity of Project Area.
Swainson's Hawk	<i>Buteo swainsoni</i>	--	2	Moderate potential to occur. Will hunt in areas with open habitat including fallow agricultural lands.
Swainson's Thrush	<i>Catharus ustulatus</i>	--	2	No potential to occur. No suitable habitat present in vicinity of Project Area.
Verdin	<i>Auriparus flaviceps</i>	BCC	2	Moderate potential to occur. Will forage in areas with open habitat including fallow agricultural lands.
Vesper Sparrow	<i>Poocetes gramineus</i>	--	2	Low potential to occur. This species may use the agricultural land within the Project Area as a stopover site on the way to more suitable habitat.

Marigold Transmission Project

Table C-2 Other Special-Status Species that May Occur in the Vicinity of the Project				
Species		Protection Status¹		
Common name	Scientific name	ESA^{2, 3}	Arizona SGCN³	Potential to Occur in Project Area (Justification)⁴
Western Burrowing Owl	<i>Athene cunicularia hypugaea</i>	SC, BCC	2	High potential to occur. The banks along the concrete irrigation canals, and proximity to open fields provide highly suitable habitat for this species.
Western Screech-Owl	<i>Megascops kennicottii</i>	--	2	Low potential to occur. Marginally suitable habitat present within Project Area.
Yellow-billed Cuckoo (Western Distinct Population Segment [DPS])	<i>Coccyzus americanus</i>	LT	1	No potential to occur. No suitable habitat is present within Project Area.
Reptiles				
Regal Horned Lizard	<i>Phrynosoma solare</i>	--	2	Low potential to occur. Marginally suitable habitat present within Project Area.
Sonoran Desert Tortoise	<i>Gopherus morafkai</i>	CCA	1	No potential to occur. No suitable habitat present within Project Area.
Variable Sandsnake	<i>Chilomeniscus stramineus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Mammals				
Antelope Jackrabbit	<i>Lepus alleni</i>		2	Low potential to occur. Marginal nonnative grassland habitat present within Project Area.
Arizona Pocket Mouse	<i>Perognathus amplus</i>	--	2	Low potential to occur. Marginal desertscrub habitat present within Project Area.
Brazilian Free-tailed Bat	<i>Tadarida brasiliensis</i>	--	2	Low potential to occur. Suitable building roosting habitat in proximity to the Project Area.
Cave Myotis	<i>Myotis velifer</i>	SC	2	Low potential to occur. Suitable building roosting habitat in proximity to the Project Area.
Gray-collared Chipmunk	<i>Neotamias cinereicollis</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Greater Western Bonneted Bat	<i>Eumops perotis californicus</i>	SC	2	No potential to occur. No suitable habitat present within Project Area.
Hoary Bat	<i>Lasiurus cinereus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Pale Townsend's Big-eared Bat	<i>Corynorhinus townsendii pallescens</i>	SC	2	No potential to occur. No suitable habitat present within Project Area.
Pocketed Free-tailed Bat	<i>Nyctinomops femorosaccus</i>	--	2	No potential to occur. No suitable habitat present within Project Area.
Sonoran Pronghorn	<i>Antilocapra americana sonoriensis</i>	LE, XN	2	No potential to occur. No suitable habitat present within Project Area.
Western Yellow Bat	<i>Lasiurus xanthinus</i>	--	2	Low potential to occur. Suitable building roosting habitat in proximity to the Project Area.
Yuma Myotis	<i>Myotis yumanensis</i>	SC	2	No potential to occur. No suitable habitat present within Project Area.

Table C-2 Other Special-Status Species that May Occur in the Vicinity of the Project				
Species		Protection Status ¹		
Common name	Scientific name	ESA ^{2, 3}	Arizona SGCN ³	Potential to Occur in Project Area (Justification) ⁴
¹ LT=Listed Threatened, SC=Species of Concern, CCA= Candidate Conservation Agreement, BCC=Bird of Conservation Concern, BGA=Bald and Golden Eagle Protection Act protected, 1 = Tier 1 and deemed vulnerable in Arizona in at least one of seven assessment criterion AND matches one of the following criterion; federally listed as endangered or threatened under the ESA, recently removed from ESA and currently required post-delisting monitoring, specifically covered under a signed conservation agreement such as CCA or a CCAA or a Conservation Strategy and Assessment or Strategic Conservation Plan, or is a closed season species (no take permitted), 2 = Tier 2 and deemed vulnerable in Arizona in at least one of seven assessment criterion but matches none of the additional criterion for Tier 1. <i>Some special-status species listed in this table do not have status listed for the federal ESA or Arizona SGCN but have a special status with another agency, such as USFS, and therefore are included in this list.</i> ² USFWS, 2026d ³ AGFD, 2026a, b,				

Birds of Conservation Concern (BCC)

The Project is located in BCR 33, the Sonoran and Mohave Deserts BCR, for which 27 BCC species are listed (USFWS, 2021). Seven of the 27 BCC species listed for the Sonoran Desert BCR were noted as having predicted range models that may intersect with the Project Area (AGFD 2026a). Of these, it was determined that only six BCC species may actually occur in proximity to the Transmission Line Project following the Project's in-field habitat assessment: Bendire's thrasher, Costa's hummingbird, gilded flicker, glia woodpecker, western burrowing owl, and verdin which are described below.

Bendire's Thrasher

Bendire's thrasher can be found in open desertscrub habitats including arid grasslands. Because Bendire's thrashers have the potential to utilize agricultural habitats for nesting and foraging, this species may occur in the Project Area. However, no nests nor individuals of this species were observed during the habitat assessment.

Costa's Hummingbird

Costa's hummingbird occurs in desertscrub in the Sonoran and Mojave deserts and chapparal and sage scrub areas in coastal California. During the nonbreeding season, they use similar dry habitats for foraging as well as parks, gardens, and higher elevation mountains. The Project Area is within the breeding range for Costa's hummingbird, and this species has been documented within five miles of the Project Area. This species may occur within the lightly vegetated portions of the Project Area near irrigation canals for nesting or foraging. However, no nests nor individuals of this species were observed during the habitat assessment.

Gila Woodpecker

Gila woodpecker occurs in arid desert habitats including Sonoran Desertscrub, riparian corridors, and areas with mesquite, cottonwood, and willow. The species is highly tolerant of human disturbance and frequently occupies agricultural, suburban, and urban environments where suitable nesting and foraging trees or large cacti are present. Gila woodpeckers commonly nest in saguaro cactus or trees in riparian or developed settings

and forage on insects and fruit in a variety of vegetation types. Because the species is adaptable and can utilize disturbed landscapes, it may occur in the Project Area where suitable nesting structures are present; however, no individuals or active nests were observed during the habitat assessment.

Gilded flicker

Gilded flicker is found in Sonoran Desert habitats, particularly areas containing saguaro cactus and desert washes with scattered trees. The species typically nests in cavities excavated in large columnar cacti such as saguaro, and forages primarily on the ground for ants and other insects in open desert environments. While generally occurring in desert scrub habitat the open nature of the agricultural land may provide suitable foraging habitat for this species. No individuals or nesting cavities of this species were observed during the habitat assessment.

Western Burrowing Owl

The western burrowing owl prefers arid habitats with short grass or bare soil, such as grasslands, deserts, and steppe environments. This species may occur within burrows created by prairie dogs, ground squirrels, badgers, or tortoises, as well as the edges of ditches along roads in agricultural areas. This species is considered a USFWS Species of Concern and has a status as AGFD SGCN 2. It also receives federal protection by the USFWS under the MBTA and by Arizona state law (Arizona Revised Statutes [ARS] Title 17). The Project Area is within the year-round range for western burrowing owl, and this species has been documented within three miles of the Project Area. Due to the presence of suitable habitat, this species may occur within the Project Area for nesting or foraging. In addition, discussions with stakeholders and members of the public have described western burrowing owl being present along the in the vicinity of the Project. However, no signs of habitation and no burrowing owl individuals were observed during the habitat assessment.

Species of Greatest Conservation Need

The AGFD Online Environmental Review Tool identified six species of greatest conservation need with Tier 1 status (two birds, one amphibian, one reptile, and two mammals) predicted to occur within five miles of the Project Area (AGFD, 2026a). Of these six species, one may occur (American peregrine falcon) in proximity to the Project Area, based on the results of the habitat assessment, familiarity with the vicinity, and freely available information sources (**Table C-2**). A description for the American peregrine falcon is provided below.

American Peregrine Falcon

The American peregrine falcon occupies a wide variety of open habitats from tundra to desert mountains. Nesting and wintering habitats are varied, including wetlands, woodlands, forests, cities, and agricultural habitats. The Project Area is within the year-round distribution range for this species. Due to the presence of agricultural habitat, the American peregrine falcon may occur within the Project Area for foraging purposes.

However, no nests nor individuals of this species were documented during the habitat assessment.

The AGFD Online Environmental Review Tool identified 45 species of greatest conservation need with Tier 2 status (four amphibians, 29 birds, two reptiles, and 10 mammals) predicted to occur within five miles of the Project Area. Of these, 30 (one amphibian, 23 birds, one reptile and five mammals) may occur in proximity to the Project Area based on the results of the habitat assessment and desktop analysis: Sonoran desert toad, American kestrel, Bendire's thrasher, Brewer's sparrow, Broad-billed hummingbird, Bullock's oriole, Costa's hummingbird, ferruginous hawk, Gila woodpecker, gilded flicker, golden eagle, gray flycatcher, Harris's hawk, Inca dove, Leconte's thrasher, loggerhead shrike, mountain plover, prairie falcon, savannah sparrow, Swainson's hawk, verdin, vesper sparrow, western burrowing owl, western screech-owl, antelope jackrabbit, Arizona pocket mouse, Brazilian free tailed bat, cave myotis, western yellow bat and regal horned lizard. No individuals of these species were observed during the habitat assessment. Potential impacts to special-status species are addressed within *Other Special-Status Species* within the "Summary of Potential Effects" section.

The AGFD Online Environmental Review Tool identified one species of greatest conservation need with Tier 3 status (one bird) predicted to occur within five miles of the Project Area (AGFD, 2026a). The sagebrush sparrow may occur in proximity to the Project Area, based on the results of the habitat assessment, familiarity with the vicinity, and freely available information sources. Potential impacts to this special-status species are addressed within *Other Special-Status Species* within the "Summary of Potential Effects" section.

Protected Native Plants

The Arizona Native Plant Law (A.R.S. § 3-904) (ANPL) identifies a lengthy list of plant species—largely cacti, agaves, yuccas, and desert trees—that are susceptible to removal for collection, landscaping, sale, or other commercial uses. The ANPL states that these plants shall not be taken, transported, or possessed from any land without permission and a permit from the ADA; it also requires notification prior to land clearing even if the plants would be destroyed. The proposed 230 kilovolt (kV) transmission lines are not located in areas with native vegetation.

Of the 37 special-status plant species recorded in the AGFD HDMS having some potential to occur within Pinal County, none have been recorded in or within three miles of the Project Area (AGFD, 2026b). Additionally, the elevation of the Transmission Line Project is outside of the range for these plants, and there is no suitable habitat.

Noxious Weeds

The State of Arizona maintains a list of noxious weeds in three categories: Class A, Class B, and Class C. Class A species are those that are not known to occur in Arizona, are of limited distribution, and are of high priority for quarantine, control, or mitigation. Class B noxious weeds are species known to occur but are of limited distribution in Arizona and may be high-priority pests for quarantine, control, or mitigation if a significant threat to

crop, commodity, or habitat exists. Class C noxious weeds are species of plants that are widespread but may be recommended for active control based on risk assessment. Weed species are expected to occur within disturbed and agricultural areas of the Transmission Line Project. Non-native species observed in proximity to these areas included stinknet (*Oncosiphon pilulifer*), Russian thistle (*Salsola tragus*), sandbur (*Cenchrus* sp.), Saharan mustard (*Brassica tournefortii*), tamarisk (*Tamarix* sp.), prickly lettuce (*Lactuca serriola*) and acacia (*Acacia* sp.). Saharan mustard, stinknet, sandbur, and tamarisk are listed as Arizona noxious weeds.

Summary of Potential Effects

Potential impacts to special-status species related to the construction of the Transmission Line Project could include displacement of individuals from the construction area, possible abandonment of nests due to construction activities, injury or death from vehicle strikes during construction, collision or electrocution risk with power lines, temporary impacts on foraging behaviors in adjacent habitat, and noise-related disturbance. Project work areas are expected to be limited to the extent practicable and vehicle speed would be limited to 15 miles per hour (mph), reducing the potential for injury or death to special-status species during construction due to vehicle strikes. The proposed 230 kV transmission lines would be constructed following industry suggested practices aimed at reducing avian collisions and electrocutions (Avian Power Line Interaction Committee [APLIC] 2012). With the incorporation of SRP's proposed measures (**Table C-3**), construction activities along the proposed 230 kV transmission lines are anticipated to have minimal impacts on the western burrowing owl and other special-status species that may be encountered.

Areas of Biological Wealth

The Transmission Line Project does not overlap with any areas of biological wealth. Agricultural and residential development, along with local roads and infrastructure, has degraded areas of natural vegetation (wildlife habitat). The majority of the project-related impacts would be temporary and short-term in nature. No wetlands, riparian areas, nor IBAs are located within or adjacent to the Transmission Line Project.

Federally Listed Threatened and Endangered Species

No suitable habitat occurs within the Project Area for the following species that are listed under the ESA or are candidates for listing—Sonoran pronghorn, cactus ferruginous pygmy-owl, yellow-billed cuckoo, or Gila topminnow—and these species would be unlikely to occur and, therefore, would not be impacted.

Monarch individuals have the low likelihood to occur within the Project Area. Monarch butterfly habitat comprises milkweed, which is used exclusively for reproduction, and floral nectar resources for adult food sources. No milkweed was observed during the habitat assessment surveys; however, monarch butterflies may use flowering plants in the Project Area for foraging. Therefore, there is a low likelihood for monarch individuals to pass through, but due to the disturbed nature of the site and the surrounding areas, it is unlikely that monarch butterflies will deposit eggs within or around the Project Area. Individual

monarch butterflies may experience injury, change of behavior, and temporary loss of foraging habitat as a result of the Transmission Line Project. Individual monarch butterflies would be expected to largely shift activity to nearby suitable foraging habitat.

Other Special-Status Species

The following sections address the potential effects from development of the Transmission Line Project components to special-status species that may occur within the Project Area.

Special-Status Mammal Species

Suitable roosting habitat for the Brazilian free-tailed bat and cave myotis may include bridges and abandoned buildings in proximity to the Project Area. These structures could potentially serve as day roosts for the bat species. Indirect impacts to bats could include temporary construction noise, which may lead to behavior changes or loss of fitness for individuals. Potential noise-related impacts would be short-term and negligible as project-related noise would not exceed the typical noise levels of existing roadways, agricultural practices and industry in the surrounding area. Direct impacts to Brazilian free-tailed bat and cave myotis are not expected due to the highly disturbed nature of the existing Project Area. Therefore, no long-term impacts would be expected to any Brazilian free-tailed bats or cave myotis that may occur in the Project Area.

Project activities would remove minor amounts of agricultural vegetation and agricultural irrigation, which may decrease the suitability of the area for foraging by insectivorous bat species. Western yellow bats, that may utilize the Project Area for foraging, have the potential to be negatively impacted by decreased prey availability as a result of agricultural vegetation and irrigation removal. However, because the Project Area is largely disturbed and limited in nature when compared to the surrounding area, any loss of vegetation or irrigation from construction activities of the Transmission Line Project would not contribute meaningfully to habitat fragmentation for special-status mammals or decrease connectivity between habitat patches. As a result, impacts to the species as a result of agricultural irrigation and agricultural vegetation removal are expected to be negligible.

Bat species can collide with human-made structures during long-distance migration. Migrating bats often fly high above ground level and do not actively echolocate. However, during normal foraging activity, bats actively use echolocation and are typically able to detect and avoid features such as overhead transmission lines (Arnett et al., 2015). No information suggests that transmission lines in a setting such as the Project Area would pose a risk to bats. Construction is not anticipated to occur at night; however, if it does in certain cases, those activities at night would increase light pollution and human presence in the Project Area and would impact bat activity patterns. The increase of nighttime lighting in the Project Area has the potential to attract insects, which could have minor beneficial impacts to some bat species as their food source increased. However, some bat species would likely shift their foraging activities away from construction and additional light. The negative impacts would likely be minor because foraging habitat for insectivorous species occurs outside of the Project Area.

Special-Status Bird Species

Bald eagles may forage in proximity to the Project Area near agricultural fields, areas containing water features and may opportunistically feed on carrion via roads and highways, though the likelihood of this type of occurrence is low. Bald eagles foraging within the Project Area would likely flee at the onset of construction. A 15-mph speed limit would be implemented within the project limits during construction to mitigate any potential impacts to this species. If a bald eagle is discovered in the area, on-site personnel would contact SRP's Avian Protection Program for steps to take to ensure the species is protected. As a result, no significant impacts are expected to potentially foraging bald eagles due to construction activities.

American peregrine falcon may utilize agricultural habitat within the Project Area for foraging, though the likelihood of this type of occurrence is low. Peregrine falcons foraging within the Project Area would likely flee at the onset of construction. A 15-mph speed limit would be implemented during construction to mitigate any potential impacts to this species. If an individual of this species is discovered in the area, on-site personnel would contact SRP's Avian Protection Program for steps to take to ensure the species is protected. No significant impacts are expected to potentially foraging American peregrine falcons as a result of construction activities.

Suitable habitat for western burrowing owl exists within the Project Area, and this species has been documented in proximity to the anticipated work areas. Potential impacts to western burrowing owl related to the construction of the Transmission Line Project could include displacement of individuals from the construction area, possible abandonment of burrows due to construction activities, injury or death from vehicle strikes during construction, temporary impacts on foraging behaviors in adjacent habitat, and noise-related disturbance. In order to mitigate potential impacts to western burrowing owl, a pre-construction survey would be conducted no more than *30 days prior to construction* for active burrows occupied by western burrowing owl. Should an active burrowing owl burrow be detected, the applicant would coordinate with AGFD and USFWS, as appropriate. If active burrows and/or nests cannot be avoided, the applicant would work with the AGFD, USFWS, and wildlife rehabilitators should western burrowing owls need to be relocated. Therefore, direct impacts associated with the Transmission Line Project would constitute a short-term minor impact on western burrowing owl. With implementation of mitigation, construction is anticipated to have minor impacts on the western burrowing owl.

Potential impacts to special-status bird species could include changes in behavior due to project-related noise, vibration, and the presence of workers and equipment, loss of breeding and foraging habitat, and impacts to nesting species. Potential impacts to nesting birds and their eggs, covered under the MBTA, would be avoided and/or minimized either by limiting ground-clearing/vegetation removal activities to outside the breeding season (generally March–August and January– June for raptors) or through surveys to identify active nests and placement of buffers around those active nests until the young fledge or the nest fails during the breeding season. As a result, no significant impacts are expected to special-status bird species due to construction activities.

Transmission lines can pose a collision risk to birds (APLIC, 2012). However, many factors influence whether birds are likely to collide with a specific transmission line. Collision risk is relatively low when multiple transmission lines are co-located or placed near other infrastructure (APLIC, 2012). The Transmission Line Project would be constructed in an area with numerous existing transmission lines and would be unlikely to contribute to an increase in bird mortality within the Project Area. To minimize that risk, the Applicant would construct the proposed transmission line following the guidelines outlined in the current version of the *APLIC Suggested Practices for Avian Protection on Powerlines and Reducing Avian Collisions with Power Lines* manuals. Electrical transmission and distribution lines can also cause bird electrocution, although the risk is highest with lower voltage lines. Electrocution occurs when a bird simultaneously contacts energized and grounded electrical components. High-voltage lines require spacing between those components that cannot be spanned even by very large birds so that electrocution risk is precluded almost entirely (APLIC, 2006).

Special-Status Reptile Species

Potential impacts to regal horned lizard include death, injury, or impacts arising from behavior changes and would be similar to those described for terrestrial mammals. Potential impacts from the loss, degradation, and fragmentation of reptilian habitat from project activities would be the same as those described for terrestrial mammals.

Special-Status Amphibian Species

Potential impacts to Sonoran Desert toad include death, injury, or impacts arising from behavior changes and would be similar to those described for terrestrial mammals. Potential impacts from the loss, degradation, and fragmentation of amphibian habitat from project activities would be the same as those described for terrestrial mammals.

Special-Status Fish Species

The Transmission Line Project would have no impact on special-status fish species because no habitat for special-status fish species is present in the Project Area.

Protected Native Plants

Of the 37 special-status plant species having some potential to occur within Pinal County (AGFD, 2026b), none have been recorded in or within five miles of the Transmission Line Project (AGFD, 2024a). Additionally, the elevation of the Transmission Line Project is outside of the range for these plants, and there is no suitable habitat. Therefore, the Transmission Line Project would have no direct or indirect impacts on threatened, endangered, and state-protected plants.

Noxious Weeds

Measures would be taken to avoid introducing or spreading noxious weeds in the Project Area; therefore, the Transmission Line Project would be unlikely to contribute to an

increase of noxious weeds, in extent or abundance, in the vicinity of the project (**Table C-3**).

Mitigation Measures

The proposed Transmission Line Project is nearly entirely within a developed area containing little natural habitat. The majority of the disturbances associated with construction of the project would occur in already previously disturbed areas. The proposed Transmission Line Project is not likely to significantly affect any rare, endangered, or other special-status species. Implementation of mitigation measures (**Table C-3**) would ensure avoidance and minimization of potential risk to wildlife, and the risk that electrical infrastructure poses to birds would be addressed by following industry-suggested practices as design features for the project.

Table C-3 SRP Proposed Measures	
BIOLOGICAL RESOURCES	
Vegetation	
<i>Adverse effects on vegetation during construction would be minimized as follows:</i>	
- Prohibit vehicle operation off designated routes by construction workers, including construction work and employee access. - Existing access roads would be used to the maximum extent allowable.	
<i>The following prescriptions would prevent the spread of invasive weeds into previously uninfested areas in the designated construction ROW.</i>	
In advance of construction activities, all construction equipment arriving on site would have the tires, axles, frame, running boards, under-carriages, and any equipment parts designed to hold soil or rock washed and cleaned to prevent transport of invasive weed species into Project Areas.	
Wildlife	
<i>Construction activities and vehicle operation would be conducted to minimize potential impacts or disturbance of wildlife.</i>	
- The Applicant will minimize the number of open trenches/excavation areas at any one given time during construction. Any trenches left uncovered overnight will be inspected to ensure no wildlife species have been trapped. If trenches cannot be backfilled in a timely manner, then escape ramps will be installed where practicable. - Speed limits along the ROW and access roads would be limited to 15 mph. In addition, construction and maintenance employees would exercise caution when traveling to and from the proposed ROW site on designated routes to reduce the potential for wildlife mortality. - During construction, work areas would be checked for animals before daily work is initiated to minimize harm. - Construction would review the AGFD's <i>Wildlife Compatible Fencing Guidelines</i> during fence construction to reduce potential impacts to wildlife by preventing potential wildlife entanglement and impalement and ensuring that wildlife movement is not restricted. - Lighting at the Project switchyard will be kept to a minimum to avoid impacts to nocturnal or nocturnally migrating wildlife. This will include minimizing the use of high intensity lighting. Lights will also be hooded downward and directed to minimize horizontal and skyward illumination while maintaining safety for emergency personnel. Whenever possible, motion-activated or infrared illumination lights that do not react to animal movement and manually operated switches will be used to keep lights off when not required. - Temporarily disturbed areas and landscaping will be revegetated with native drought-resistant plants where feasible.	
<i>Design would minimize electrocution and collision potential for birds.</i>	
Design would space conductors and shield wires sufficiently apart so that large-bodied birds cannot contact two conductors or one conductor and a shield wire to cause electrocution as outlined in <i>Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006</i> and <i>Reduced Avian Collisions with Power Lines: The State of the Art in 2012</i> (APLIC, 2006; 2012).	
<i>Implement conservation measures to decrease the likelihood of take of special-status wildlife species and impacts to critical habitat.</i>	
Minimize habitat degradation by limiting travel to existing roads and surface disturbance to previously disturbed areas.	
Conduct pre-construction burrowing owl survey within 30 days prior to the commencement of construction activities during the burrowing owl nesting season for active burrows occupied by western burrowing owl and other bird nests protected under the MBTA. If an active burrowing owl burrow is detected, SRP's Avian Protection Program would coordinate with the AGFD and USFWS as appropriate.	
If construction would occur during the nesting season, a pre-construction migratory bird nest survey would be conducted within 10 days prior to the commencement of construction activities	

Table C-3
SRP Proposed Measures

to ensure that any active nests are avoided. If an active nest is discovered, on-site personnel would contact SRP's Avian Protection Program for steps to take to ensure the nesting birds are protected.
• Should wildlife be encountered within the Project Area, the individual(s) would be relocated no more than 0.25 mile outside of the Project Area into similar habitat.

References

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EXHIBIT C-1
USFWS IPAC RESULTS

IPaC resource list

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

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

Location

Pinal County, Arizona



Local office

Arizona Ecological Services Field Office

☎ (602) 242-0210

📅 (602) 242-2513

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

Endangered species

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

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

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

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

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

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

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

- 1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
- 2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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

Mammals

NAME	STATUS
Sonoran Pronghorn <i>Antilocapra americana sonoriensis</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4750	EXPN

Birds

NAME	STATUS
Cactus Ferruginous Pygmy-owl <i>Glaucidium brasilianum cactorum</i> Wherever found There is final critical habitat for this species. https://ecos.fws.gov/ecp/species/1225	Threatened
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> Wherever found There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

Fishes

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

Insects

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

Critical habitats

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

There are no critical habitats at this location.

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

Bald & Golden Eagles

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

Additional information can be found using the following links:

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

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.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</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/1626	Breeds Oct 15 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 (■)

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

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

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

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

Breeding Season (■)

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

Survey Effort (|)

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

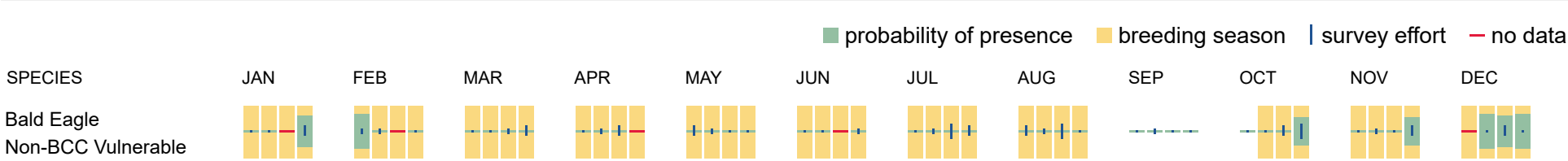
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

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

Survey Timeframe

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



Bald & Golden Eagles FAQs

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

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

Proper interpretation and use of your eagle report

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

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

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

Interpreting the Probability of Presence Graphs

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

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

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

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

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

Breeding Season ()

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

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

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

Survey Timeframe

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

Migratory birds

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

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

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

Measures for Proactively Minimizing Migratory Bird Impacts

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

Ensure Your Migratory Bird List is Accurate and Complete

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

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

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
American Avocet <i>Recurvirostra americana</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Apr 21 to Aug 10
Bald Eagle <i>Haliaeetus leucocephalus</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/1626	Breeds Oct 15 to Aug 31
Clark's Grebe <i>Aechmophorus clarkii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 1 to Aug 31
Gila Woodpecker <i>Melanerpes uropygialis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31
Marbled Godwit <i>Limosa fedoa</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds elsewhere
Mountain Plover <i>Charadrius montanus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3638	Breeds elsewhere
Western Grebe <i>Aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere

Probability of Presence Summary

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

Probability of Presence (■)

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

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

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted

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

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

Breeding Season (■)

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

Survey Effort (|)

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

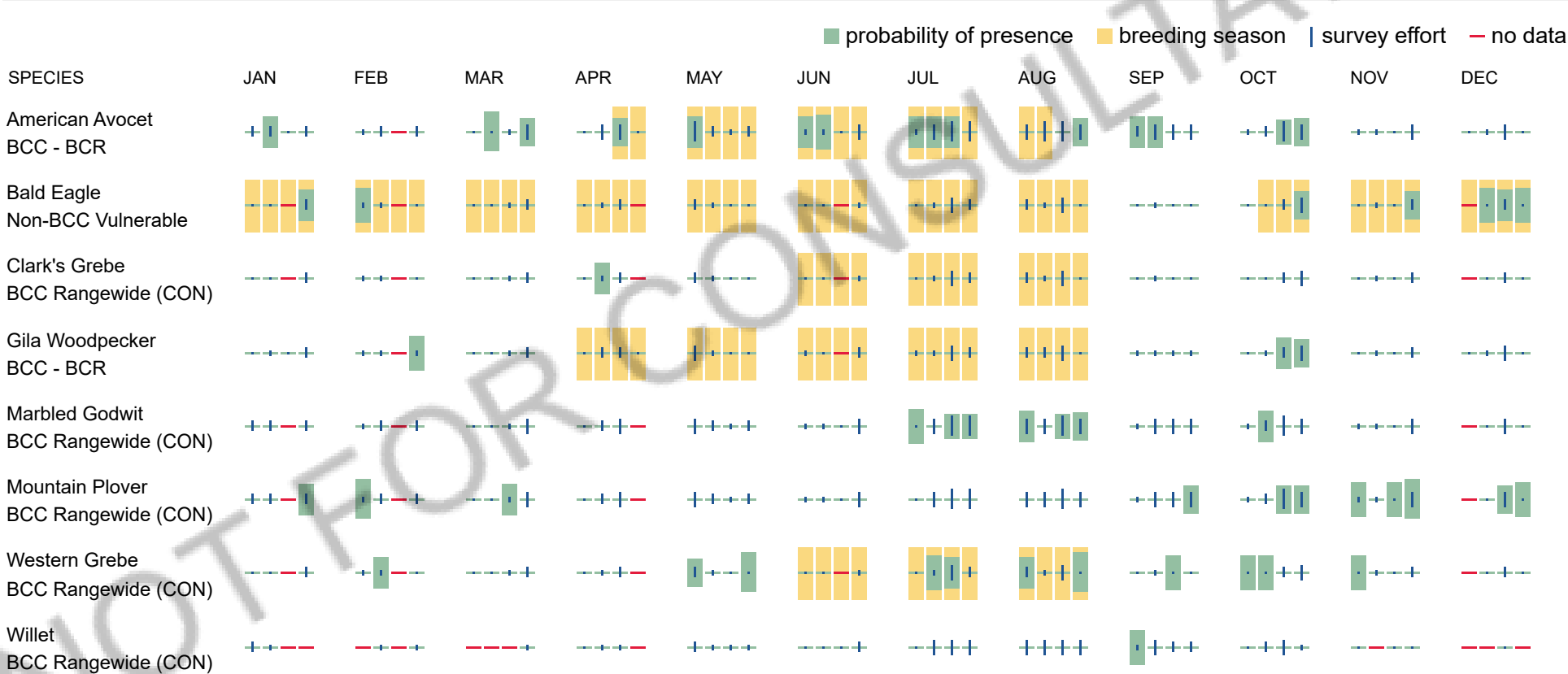
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

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

Survey Timeframe

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



Migratory Bird FAQs

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

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

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

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

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

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

Why are subspecies showing up on my list?

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

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

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

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

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

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

What are the levels of concern for migratory birds?

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

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

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

Details about birds that are potentially affected by offshore projects

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

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs

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

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

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

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

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

Breeding Season ()

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

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

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

Survey Timeframe

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

Facilities

National Wildlife Refuge lands

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

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

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

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

Wetland information is not available at this time

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

Data limitations

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

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

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

Data exclusions

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

Data precautions

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

EXHIBIT C-2
AGFD ONLINE ENVIRONMENTAL REVIEW TOOL RESULTS

Arizona Environmental Online Review Tool Report



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

The Department requests further coordination to provide project/species specific recommendations. Please use the [Project Evaluation Form](#) to submit your project to the Project Evaluation Program at PEP@azgfd.gov.

Project Name:

Marigold Energy Center Project

Project Type:

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

Project ID:

HGIS-28260

Project Description:

The Marigold Energy Center includes the construction of PV Solar, Battery Energy Storage Systems, new substation, natural gas fired generation, and an approximately 4 mile transmission line on approximately 5,000 acres south east of Ak-Chin, Arizona on primarily state trust lands.

Contact Person:

Hunter Watson

Organization:

Arizona Game and Fish Department

On Behalf Of:

AZGFD

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.

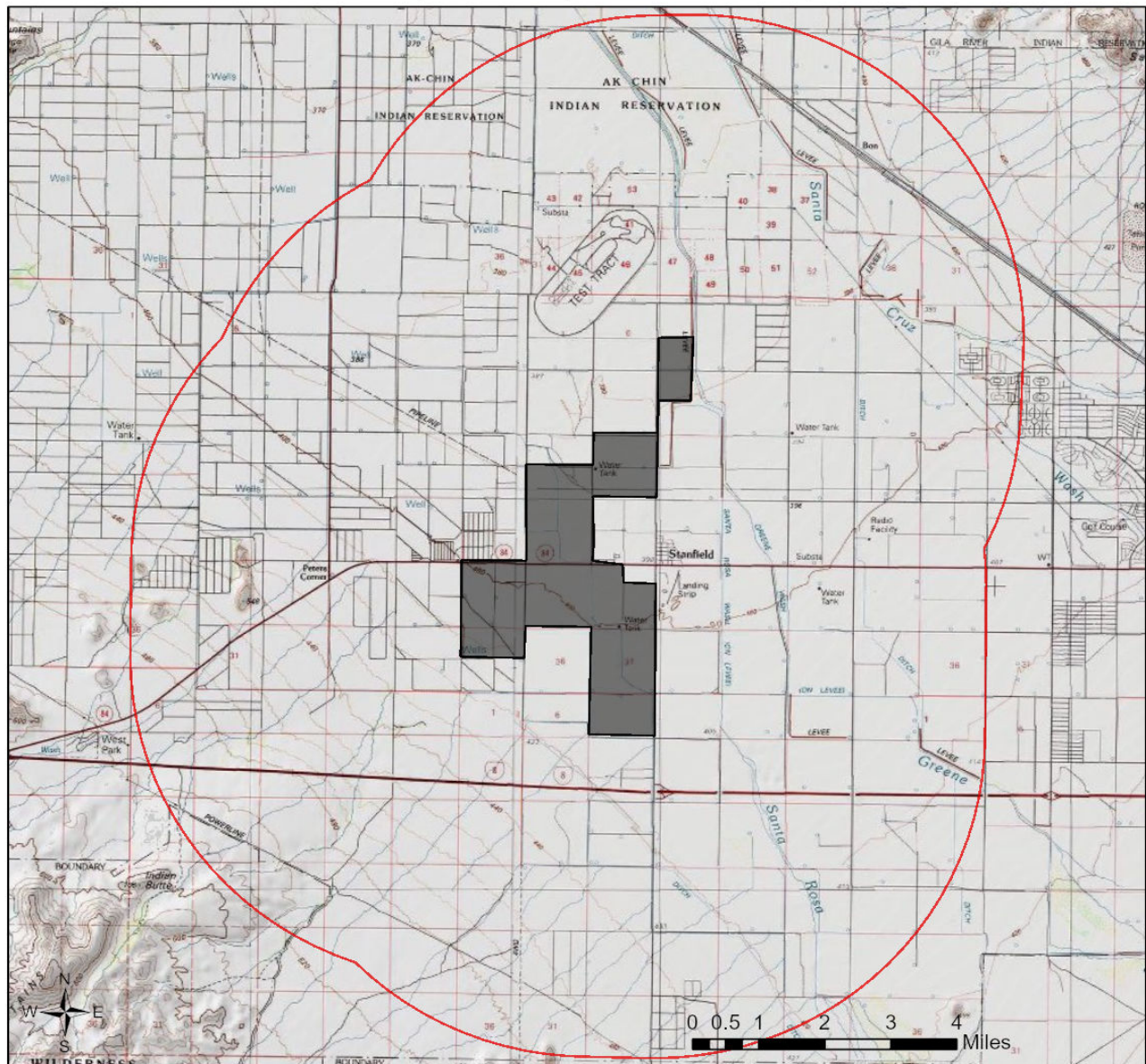
Locations Accuracy Disclaimer:

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.

Marigold Energy Center Project USA Topo Basemap With Locator Map



-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 5,073.36

Lat/Long (DD): 32.8777 / -111.9832

County(s): Pinal

AGFD Region(s): Mesa; Yuma

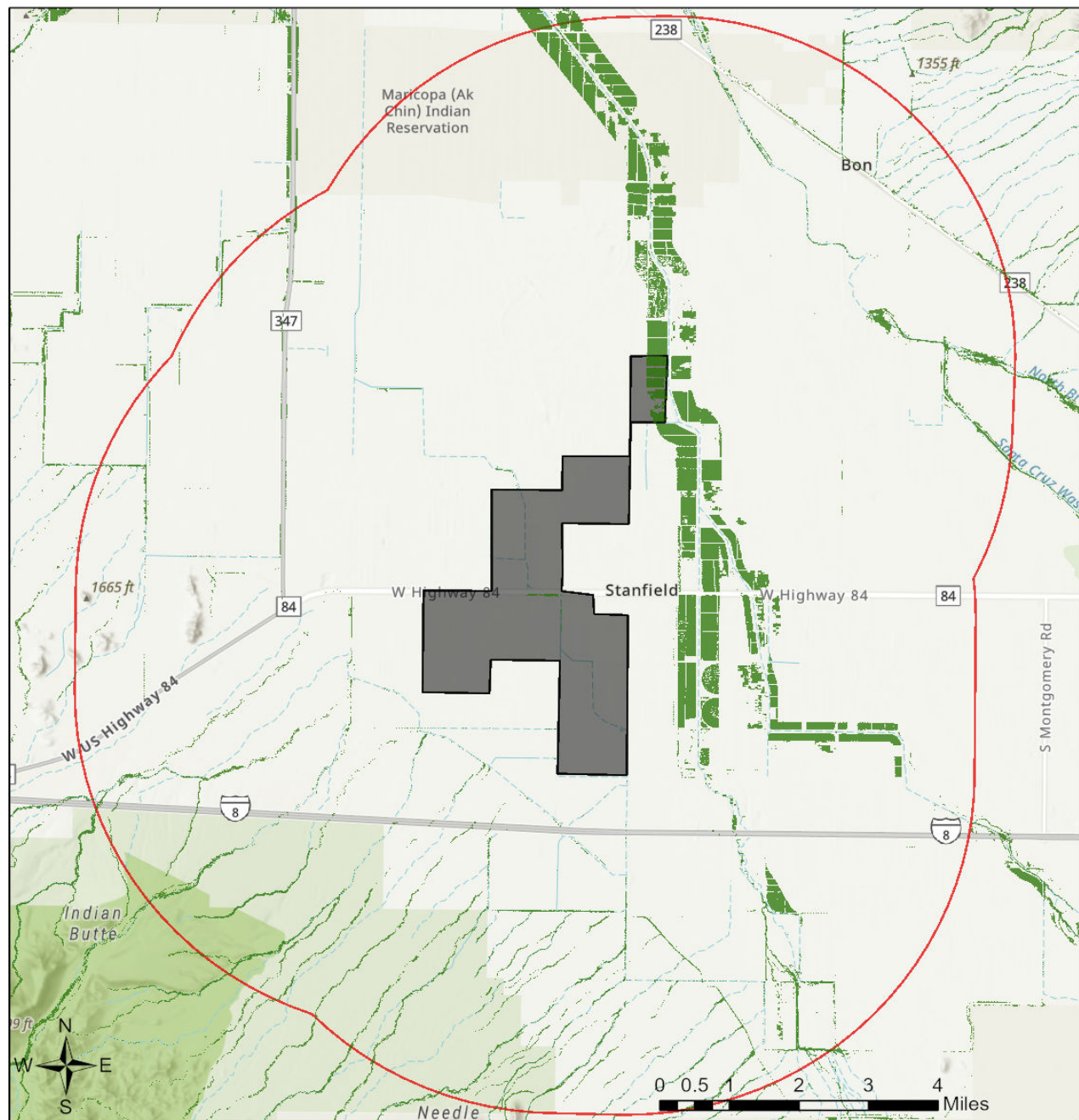
Township/Range(s): T6S, R3E; T6S, R4E; T7S, R4E

USGS Quad(s): ANTELOPE PEAK NE; DOUBLE PEAK +

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



Marigold Energy Center Project Important Areas



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

Project Size (acres): 5,073.36

Lat/Long (DD): 32.8777 / -111.9832

County(s): Pinal

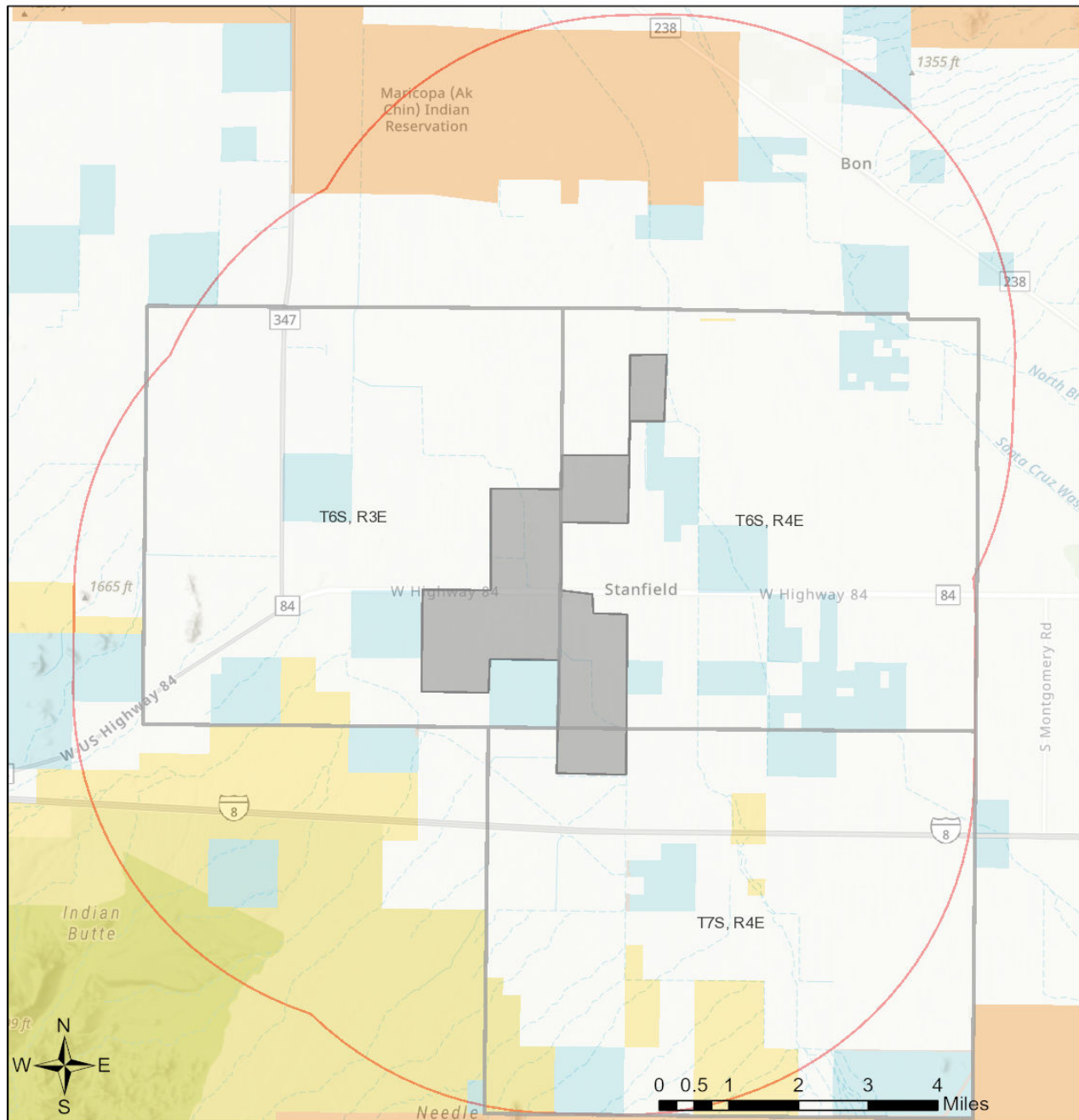
AGFD Region(s): Mesa; Yuma

Township/Range(s): T6S, R3E; T6S, R4E; T7S, R4E

USGS Quad(s): ANTELOPE PEAK NE; DOUBLE PEAK +

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

Marigold Energy Center Project Township/Ranges and Land Ownership



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

Project Size (acres): 5,073.36

Lat/Long (DD): 32.8777 / -111.9832

County(s): Pinal

AGFD Region(s): Mesa; Yuma

Township/Range(s): T6S, R3E; T6S, R4E; T7S, R4E

USGS Quad(s): ANTELOPE PEAK NE; DOUBLE PEAK +

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
<i>Antilocapra americana sonoriensis</i>	Sonoran Pronghorn	LE,XN		S		1
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl		S	S		2
<i>Chaetodipus baileyi</i>	Bailey's Pocket Mouse					2
<i>Falco sparverius</i>	American Kestrel					2
<i>Incilius alvarius</i>	Sonoran Desert Toad					2
<i>Lepus alleni</i>	Antelope Jackrabbit					2
<i>Perognathus amplus</i>	Arizona Pocket Mouse					2
<i>Toxostoma bendirei</i>	Bendire's Thrasher					2

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

Special Areas Documented that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Antilocapra americana sonoriensis</i>	10J Area for Sonoran Pronghorn	LE,XN				
Gila River to Lake St. Claire	Pinal County Wildlife Movement Area - Riparian/Wash					
Riparian Area	Riparian Area					

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

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Anarhynchus montanus</i>	Mountain Plover					2
<i>Anaxyrus retiformis</i>	Sonoran Green Toad			S		2
<i>Anthus spragueii</i>	Sprague's Pipit					2
<i>Aquila chrysaetos</i>	Golden Eagle	BGA		S		2
<i>Artemisiospiza nevadensis</i>	Sagebrush Sparrow					3
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl		S	S		2
<i>Auriparus flaviceps</i>	Verdin					2
<i>Botaurus lentiginosus</i>	American Bittern					2
<i>Buteo regalis</i>	Ferruginous Hawk			S		2
<i>Buteo swainsoni</i>	Swainson's Hawk					2
<i>Calcarius ornatus</i>	Chestnut-collared Longspur					2
<i>Calypte costae</i>	Costa's Hummingbird					2
<i>Campylorhynchus brunneicapillus</i>	Cactus Wren					2
<i>Catharus ustulatus</i>	Swainson's Thrush					2
<i>Chilomeniscus cinctus</i>	Variable Sandsnake					2
<i>Coccyzus americanus</i>	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1

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
Colaptes chrysoides	Gilded Flicker			S		2
Columbina inca	Inca Dove					2
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat		S	S		1
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Dendrocygna autumnalis	Black-bellied Whistling-Duck					2
Empidonax wrightii	Gray Flycatcher					2
Eumops perotis californicus	Greater Western Bonneted Bat			S		2
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon		S	S		1
Falco sparverius	American Kestrel					2
Gastrophryne mazatlanensis	Sinoloan Narrow-mouthed Toad			S		2
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Icterus bullockii	Bullock's Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Lanius ludovicianus	Loggerhead Shrike					2
Lasiurus cinereus	Hoary Bat					2
Lasiurus xanthinus	Western Yellow Bat		S			2
Lepus alleni	Antelope Jackrabbit					2
Macrotus californicus	California Leaf-nosed Bat			S		2
Megascops kennicottii	Western Screech-owl					2
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolni	Lincoln's Sparrow					2
Melospiza aberti	Abert's Towhee		S			2
Micrathene whitneyi	Elf Owl					3
Myotis velifer	Cave Myotis			S		2
Myotis yumanensis	Yuma Myotis					2
Neotamias cinereicollis	Gray-collared Chipmunk					2
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2
Parabuteo unicinctus	Harris's Hawk					2
Passerculus sandwichensis	Savannah Sparrow					2
Perognathus amplus	Arizona Pocket Mouse					2
Phrynosoma solare	Regal Horned Lizard					2
Poocetes gramineus	Vesper Sparrow					2
Rana yavapaiensis	Lowland Leopard Frog		S	S		1
Smilisca fodiens	Lowland Burrowing Treefrog			S		2
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Toxostoma bendirei	Bendire's Thrasher					2
Toxostoma lecontei	LeConte's Thrasher			S		2

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

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

Project Type Recommendations:

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and it is important to identify and conserve upland wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife species. Guidelines for many of these can be found at:

<https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/>.

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

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

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

The AZGFD recommends that wildlife surveys are conducted to determine if noise-sensitive species, such as birds or mammals, occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

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

The AZGFD recommends that a qualified biologist conduct a survey for nesting birds within the project area prior to removal or trimming of trees/vegetation, if the removal or trimming occurs during the breeding season (the Project Evaluation Program can be contacted at PEP@azgfd.gov or 623-236-7600 to determine the appropriate breeding season within the project area). Trees and/or vegetation within the project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA) and protected under state law. If it is anticipated the project will not be in compliance with MBTA, the AZGFD recommends contacting the U.S. Fish and Wildlife Service (<https://www.fws.gov/office/arizona-ecological-services>) for technical assistance. The USFWS will provide options to comply with the MBTA.

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

Project Location and/or Species Recommendations:

Analysis indicates that your project is located in the vicinity of an identified **wildlife habitat connectivity feature**. The **County-level Stakeholder Assessments** contain five categories of data (Barrier/Development, Wildlife Crossing Area, Wildlife Movement Area- Diffuse, Wildlife movement Area- Landscape, Wildlife Movement Area- Riparian/Washes) that provide a context of select anthropogenic barriers, and potential connectivity. The reports provide recommendations for opportunities to preserve or enhance permeability. Project planning and implementation efforts should focus on maintaining and improving opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer to: <https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-identifying-corridors/>. Please contact the Project Evaluation Program (pep@azgfd.gov) for specific project recommendations.

This review has identified **riparian areas** within the vicinity of your project. During the planning stage of your project, avoid, minimize, or mitigate any potential impacts to riparian areas identified in this report. Riparian areas play an important role in maintaining the functional integrity of the landscape, primarily by acting as natural drainages that convey water through an area, thereby reducing flood events. In addition, riparian areas provide important movement corridors and habitat for fish and wildlife. Riparian areas are channels that contain water year-round or at least part of the year. Riparian areas also include those channels which are dry most of the year, but may contain or convey water following rain events. All types of riparian areas offer vital habitats, resources, and movement corridors for wildlife. The Pinal County Comprehensive Plan (i.e. policies 6.1.2.1 and 7.1.2.4), Open Space and Trails Master Plan, Drainage Ordinance, and Drainage Design Manual all identify riparian area considerations, guidance, and policies. Guidelines to avoid, minimize, or mitigate impacts to riparian habitat can be found at <https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/>. Further consultation with the Arizona Game and Fish Department and Pinal County may be warranted.

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/>.

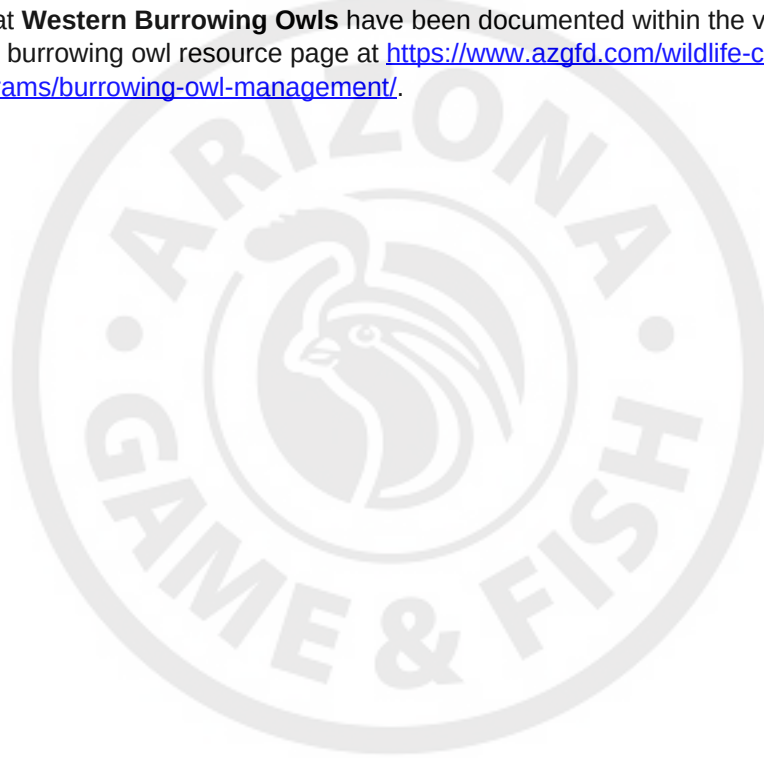


EXHIBIT C-3
AGFD REVIEW OF THE MARIGOLD ENERGY CENTER PROJECT



May 21, 2026

Mr. Tristen Utic
Wildlife Biologist & Environmental Planner
KP Environmental
Encinitas, CA 92024

Electronically submitted to: tutic@kpenvironmental.com

RE: Marigold Energy Center Project

Dear Mr. Utic:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Marigold Energy Center Project (Project). The Department understands that the Salt River Project (SRP) proposes to construct a renewable energy facility consisting of photovoltaic (PV) solar arrays, a battery energy storage system (BESS), a natural gas fire power generation facility, and an approximately 4-mile 230 kV gen-tie line which would connect to a newly constructed substation on approximately 5,073 acres of Arizona State Trust Lands located in Pinal County, Arizona, on primarily agricultural lands.

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

The Department recognizes the importance of planning efforts to develop energy infrastructure that contribute to regional and state economic growth needs and would like to work closely with 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 recreational access during development and operation of the facilities. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

ARIZONA
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MESA OFFICE: 7200 E. UNIVERSITY DRIVE, MESA AZ 85207

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

The Department recommends conducting surveys in the project area to determine species presence. These surveys should be of sufficient duration and intensity to adequately assess all habitat types and potential wildlife species occurrence in and adjacent to the project area. Department staff are available to assist SRP and KP Environmental in determining appropriate surveys to conduct and design features and best management practices that can help minimize potential impacts. The attached [Arizona Online Environmental Tool](#)¹ (ERT) report (HGIS-28260) identifies Species of Greatest Conservation Need (SGCN), as identified in Arizona's State Wildlife Action Plan, and Species of Economic and Recreational Importance that have been documented and predicted within the buffered project footprint. Please note the Department has an interactive website, [Arizona Wildlife Conservation Strategy](#), that includes the most recent list of SGCN species statewide to help navigate and identify conservation opportunities. Based on the information provided, the Department offers the following recommendations to reduce potential impacts to wildlife and habitat:

- The western burrowing owl, a special status species that is regulated under the Migratory Bird Treaty Act (MBTA), has been documented within 1 mile of the project area. The Department recommends conducting occupancy surveys for this species in advance of the design phase to understand distribution of burrowing owls in the project site; avoidance of a large burrowing owl population may be advisable over removal or other conservation measures. Guidelines for conducting this survey are found in [Burrowing Owl Project Clearance Guidance for Landowners](#)². Please note that the survey should be conducted by a surveyor who is certified by the Department or has similar training and qualifications. If an active burrowing owl burrow is detected, please contact the Department and the [U.S. Fish and Wildlife Service](#)³ (USFWS) for direction, in accordance with the guidelines.
- The Department also recommends conducting surveys for nesting birds prior to vegetation removal and/or construction activities that occur during the breeding season, which is typically January-June in this area. The vegetation within the project area may provide nesting opportunities for avian species that are regulated under the MBTA. If it is anticipated the project will not be in compliance with MBTA, the Department recommends contacting the USFWS for technical assistance.

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

- The Department recommends following the Avian Power Line Interaction Committee (APLIC) guidelines for new power lines, which can be found in the current version of *Suggested Practices for Avian Protection on Power Lines and Reducing Avian Collisions with Power Lines*. Large bodied birds, such as hawks, owls, vultures, and eagles, may be vulnerable to line strikes and electrocution during construction and operation of power lines and substations; power poles can also serve as perches for large-bodied birds. These potential impacts can be avoided or minimized by following the APLIC guidelines which include designing the power lines with enough space between energized components to

¹ <https://ert.azgfd.gov/content/home>

² https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/nongame/eagles/BurrowingOwlClearanceProtocol_2009.pdf

³ <https://www.fws.gov/office/arizona-ecological-services/contact-us>

reduce the likelihood of a bird electrocution or installing bird flight diverters in sections of line where elevated bird strikes are anticipated (e.g. lines over water bodies or in the path of colonial roosting locations). The Department's Raptor Coordinator, who can be contacted at raptors@azgfd.gov or 623-236-7575, can provide further information on specific design features and best management practices.

- If other wildlife are encountered during construction activities, the Department recommends moving them out of harm's way, no more than 0.25 mile outside the project boundary within similar habitat.
- If trenching or digging of large holes is necessary, the Department recommends trenching/digging and backfilling crews be close together to minimize the amount of open holes at any given time. Where trenches or holes cannot be back-filled immediately, the Department recommends escape ramps be constructed at least every 300 feet. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The Department recommends that slopes be less than 45 degrees (1:1) and trenches and holes that have been left open be inspected to remove animals prior to backfilling.
- Artificial lighting could impair the ability of nocturnal animals to navigate (e.g., owls, migratory birds, bats, and other nocturnal mammals) and may affect wildlife behavior and populations ([Davies et. al. 2013](#)⁴). The Department recommends using only the minimum amount of light needed for safety. The Department encourages the use of motion sensing lighting and "warmer" narrow spectrum lighting (amber, orange, red) which is wildlife-friendly and should be used as often as possible to minimize the number of species affected by lighting. It is also beneficial that all lighting is shielded, canted, or cut to minimize the amount of upward shining light.
- To minimize the potential introduction or spread of invasive species, the Department encourages taking precautions to wash and/or decontaminate equipment before entering and leaving the site. See the [Arizona Department of Agriculture's website](#)⁵ for a list of prohibited and restricted noxious weeds and the [Arizona Native Plant Society](#)⁶ for recommendations on how to control them. To view a list of documented invasive species or to report invasive species in or near your project area, visit [iMapInvasives](#)⁷, which is a national cloud-based application for tracking and managing invasive species.
 - Stinknet is a highly invasive noxious winter weed native to South Africa, and is extremely flammable when dry. Stinknet (also known as globe chamomile) has heavily infested Maricopa, Pinal, and Pima counties and is expanding into Yuma, Yavapai, Graham and Gila counties. Infestations spread rapidly along highways and open fields in residential areas, with emergence starting in late November and plants continuing to germinate and emerge through May in wet years. This species is likely present within, or adjacent to, the project area. In order to minimize the spread of this plant it is critical that any new infestations are identified and quickly managed. Additional information is available through the

⁴ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119>

⁵ <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>

⁶ <https://aznps.com/invas>

⁷ <https://imap.natureserve.org/imap/services/page/map.html>

[Southwest Vegetation Management Association](#)⁸, the [Sonoran Desert Cooperative Weed Management Area](#)⁹, or the [Arizona Native Plant Society](#)¹⁰.

- The Department 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.

Thank you for the opportunity to provide input on the Marigold Energy Center Project. The Department appreciates SRP's conservation efforts in the state of Arizona and appreciates the close coordination and partnership between our agencies. For further coordination, please contact Hunter Watson at hwatson@azgfd.gov or 480-997-3401.

Sincerely,



Kriselle Colvin

Regional Supervisor, Region VI

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

Attachment: HGIS-28260 ERT Species Report

AZGFD #M26-04223215

⁸ <https://www.swvma.org/>

⁹ <https://www.sdewma.org/species/stinknet.php>

¹⁰ <http://aznps.com>

EXHIBIT D BIOLOGICAL RESOURCES

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

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

Introduction

To identify vegetation and wildlife that may occur at or in the vicinity of the proposed Marigold Transmission Project (Transmission Line Project), KP Environmental, Inc. (KPE) reviewed the following sources:

- Topographical and aerial maps and land use, land cover, and elevation data.
- The U.S. Fish and Wildlife Service (USFWS) species list for the Transmission Line Project area was obtained from the USFWS online Information for Planning and Consultation (IPaC) system (**Exhibit C-1**) (USFWS, 2026).
- Species information obtained from the USFWS Environmental Conservation Online System, the USFWS Arizona Ecological Services document library, the Arizona Game and Fish Department (AGFD) Online Environmental Review Tool (**Exhibit C-2**) and special-status species listed in the AGFD Heritage Data Management System (HDMS) within Maricopa County (AGFD, 2006; 2026a; 2026b).

In addition, a habitat assessment survey was conducted within the Transmission Line Project area for biological resources:

- On May 16, 2026, an Ironwood Consulting, a Spheros Company (Ironwood), biologist with knowledge of the biology of flora and fauna of the region completed an on-ground habitat assessment survey of the proposed 230 kV Right-of-Way plus a 500-foot buffer on either side (Project Area).

Results

Exhibit D-1 contains **Tables D-1, D-2, D-3, D-4, D-5, D-6 and D-7**. **Table D-1** includes species that were observed during the biological habitat assessment in May 2026, and **Tables D2-D7** include lists of common plant life, invertebrates, mammals, birds, reptiles, and amphibians potentially present in Pinal County and within the vicinity of the Project Area.

The habitat assessment survey determined that overall habitat quality, plant diversity, and density are very low. The majority of the Project Area is recently tilled agricultural land that is crossed by concrete lined irrigation canals. The transmission line corridors are comprised of previously disturbed areas with evidence of all-terrain vehicle traffic which are lined with trash and debris. The surrounding area consists of primarily of agricultural operations, development, and industrial

areas. There were no burrows, nests or nest-building behavior identified during the survey, nor were there any threatened or endangered species observed during the habitat assessment survey.

In addition, the Transmission Line Project is located in an area with active commercial and agricultural development with agricultural transitioning into industrial development. No protected areas, or any areas of biological wealth were noted within the Project Area.

Vegetation

The proposed Project Area is located within the Middle Gila/Salt River Floodplains subdivision (IV ecoregion) of the Sonoran Basin and Range III ecoregion (Griffith, 2014) with an elevation of approximately 1,300 feet above mean sea level). Land uses in the Project Area include agricultural and residential development, roads and other infrastructure. The agricultural land within the Project Area features several concrete-lined irrigation channels that cross the northern portion of the proposed Transmission Line Project with disturbed grass along the channel in some areas. The vegetation communities found within the area are described below. **Table D-1** in **Exhibit D-1** lists some of the native vegetation that could be found within the Project Area and Pinal County in general.

Shrubland Habitat

The Transmission Line Project intersects a very small swath of shrubland habitat immediately south of W Clayton Road and along the corner of Highway 84 and N Fuqua Rd. There are a handful of shrubs and herbaceous species; desert broom (*Baccharis sarathroides*) and mallows (*Spaeralea* sp.) within the patch of shrubland habitat. The vegetation runs parallel to the proposed transmission corridor for approximately 1,000 feet but is only around 100 feet wide. The scrubland habitat identified within and adjacent to the proposed Project Area is of low quality due to the surrounding development and agricultural use and the sparse nature of the vegetation within these areas.

Nonnative grassland

Patches of nonnative grassland occur throughout the proposed Project and transmission corridor. This habitat is dominated by annual beardgrass (*Polypogon monspeliensis*), Bermuda grass (*Cynodon dactylon*), and Sahara mustard (*Brassica tournefortii*). Most nonnative grassland areas are associated with irrigation canals, small ephemeral drainages, and the margins of disturbed areas and agricultural fields within the Project Area. Overall, this habitat is considered low quality due to its limited extent and connectivity, as well as the surrounding matrix of agricultural lands, roadways, and developed areas. As a result, the nonnative grassland habitat within the Project Area functions more similarly to disturbed habitat than to native grassland and provides limited habitat value for grassland-dependent wildlife species.

Disturbed Habitat

The Project Area contains graded areas, and several paved and dirt roadways. There are also commercial businesses and recreational facilities in the areas east of the southern portion of the Transmission Line Project. Non-native species observed in proximity to these areas included

stinknet (*Oncosiphon pilulifer*), Russian thistle (*Salsola tragus*), sandbur (*Cenchrus* sp.), Saharan mustard (*Brassica tournefortii*), tamarisk (*Tamarix* sp.), prickly lettuce (*Lactuca serriola*) and acacia (*Acacia* sp.). Saharan mustard, stinknet, sandbur, and tamarisk are listed as Arizona noxious weeds.

Agricultural Habitat

The Project Area contains some agricultural fields that are transitioning to industrial within the northern portion of the proposed project. Some agricultural plots observed were either currently active or served as vehicle/equipment storage areas overgrown with non-native vegetation.

Wildlife

Common wildlife species that have the potential to occur in the proposed Project Area and the immediate vicinity are associated with desertscrub habitats. Representative bird species include elf owl (*Micrathene whitneyi*), gilded flicker (*Colaptes chrysoides*), Gila woodpecker (*Melanerpes uropygialis*), Costa's hummingbird (*Calypte costae*), LeConte's thrasher (*Toxostoma lecontei*), and Brewer's sparrow (*Spizella breweri*) (Arizona Bird Species Conservation Initiative and Sonoran Joint Venture 2023). **Table D-1** presents common and special status species that were observed in the vicinity of the Project Area during the habitat assessment performed by Ironwood in May 2026. Special status species observed during this study were included in the species analysis in **Exhibit C**.

Exhibit D-1 contains **Tables, D-1, D-2, D-3, D-4, D-5, D-6, and D-7** which include lists of plant life, mammals, birds, reptiles, and amphibians potentially present in Pinal County as identified in the AZGFD Heritage Data Management System, and the species list from habitat analysis performed in the vicinity of the Project Area. Some of the species are also listed in **Exhibit C** as Wildlife of Special Concern.

Summary of Potential Effects

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

Invasive Weed Species and Noxious Weeds

Non-native and weed species typically dominate disturbed and unmaintained areas. Non-native species observed in proximity to these areas included stinknet (*Oncosiphon pilulifer*), Russian thistle (*Salsola tragus*), sandbur (*Cenchrus* sp.), Saharan mustard (*Brassica tournefortii*), tamarisk (*Tamarix* sp.), prickly lettuce (*Lactuca serriola*) and acacia (*Acacia* sp.). Saharan mustard, stinknet, sandbur, and tamarisk are listed as Arizona noxious weeds.

Mitigation Measures

The following mitigation measures reduce risk of animal injury or spread of invasive species. For mitigation measures specific to special-status species, please see **Exhibit C**.

- To minimize risks to birds, the new transmission lines would be constructed following industry suggested practices aimed at reducing avian collisions and electrocutions (APLIC, 2006; 2012). If avian-line interactions become an issue, SRP would move quickly to evaluate the issue and craft a solution using appropriate measures. Therefore, potential impacts to migratory birds and their populations would be minimized.
- Pre-construction surveys for nesting birds would be conducted by qualified biologists if vegetation clearing activities would occur during bird nesting season (generally March–August and January–June for raptors).
- To minimize the introduction and spread of invasive species and noxious weeds, standard best management practices (BMPs) would be used during construction. These BMPs can include measures such as washing equipment prior to and following mobilization to the Project Area.

References

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- Corman, T.E., and C. Wise-Gervais. 2005. *Arizona Breeding Bird Atlas*. Albuquerque: University of New Mexico Press.
- Hoffmeister, D.F. 1986. *Mammals of Arizona*. University of Arizona Press.
- Stebbins, Robert. 1985. *A Field Guide to Western Reptiles and Amphibians*. Sacramento, California Department of Fish and Game.
- U.S. Fish and Wildlife Service (USFWS). 2024. Information for Planning and Consultation Resource List, List of Species. Accessed: March 2024. Available at: <http://www.http://ecos.fws.gov/ipac/>.

EXHIBIT D-1
BIOLOGICAL RESOURCES TABLES

Table D-1 Species Observed During the Biological Habitat Assessment in the Vicinity of the Project	
Common Name	Scientific Name
Birds	
Brown-Headed Cowbird	<i>Molothrus ater</i>
Horned Lark	<i>Eremophila alpestris</i>
Killdeer	<i>Charadrius vociferus</i>
Mourning Dove	<i>Zenaida macroura</i>
Red-Tailed Hawk	<i>Buteo jamaicensis</i>
Red-Winged Blackbird	<i>Agelaius phoeniceus</i>
Yellow-Rumped Warbler	<i>Setophaga coronata</i>
Phainopepla	<i>Phainopepla nitens</i>
Western Burrowing Owl	<i>Athene cunicularia hypugaea</i>
Yellow-Winged Blackbird	<i>Agelasticus thilius</i>
Mammals	
Javelina	<i>Pecari tajacu</i>
Reptiles	
Rattlesnake	<i>Crotalus sp.</i>
Zebra-Tailed Lizard	<i>Callisaurus draconoides</i>
Plants	
Annual Beardgrass	<i>Polypogon monspeliensis</i>
Bermuda Grass	<i>Cynodon dactylon</i>
Desert Broom	<i>Baccharis sarathroides</i>
Globemallow	<i>Sphaeralcea sp.</i>
Sahara Mustard	<i>Brassica tournefortii</i>
¹ Ironwood, 2026.	

Table D-2
Amphibian Species¹

Common Name	Scientific Name
American Bullfrog	<i>Rana catesbeiana</i>
Barred Tiger Salamander	<i>Ambystoma mavortium mavortium</i>
Canyon Treefrog	<i>Hyla arenicolor</i>
Chiricahua Leopard Frog	<i>Rana chiricahuensis</i>
Couch's Spadefoot	<i>Scaphiopus couchii</i>
Great Plains Toad	<i>Anaxyrus cognatus</i>
Lowland Leopard Frog	<i>Rana yavapaiensis</i>
Mexican Spadefoot	<i>Spea multiplicata</i>
Red-spotted Toad	<i>Anaxyrus punctatus</i>
Rio Grande Leopard Frog	<i>Rana berlandieri</i>
Sinoloan Narrow-mouthed Toad	<i>Gastrophryne mazatlanensis</i>
Sonoran Desert Toad	<i>Incilius alvarius</i>
Sonoran Green Toad	<i>Anaxyrus retiformis</i>
Western Tiger Salamander	<i>Ambystoma mavortium</i>
Woodhouse's Toad	<i>Anaxyrus woodhousii</i>
¹ AGFD, 2026.	

Table D-3
Bird Species¹

Common Name	Scientific name
Abert's Towhee	<i>Melospiza aberti</i>
American Barn Owl	<i>Tyto furcata</i>
American Coot	<i>Fulica americana</i>
American Crow	<i>Corvus brachyrhynchos</i>
American Goshawk	<i>Astur atricapillus</i>
American Kestrel	<i>Falco sparverius</i>
American Peregrine Falcon	<i>Falco peregrinus anatum</i>
American Pipit	<i>Anthus rubescens</i>
American Redstart	<i>Setophaga ruticilla</i>
American Robin	<i>Turdus migratorius</i>
American Wigeon	<i>Mareca americana</i>
Anna's Hummingbird	<i>Calypte anna</i>
Arizona Bell's Vireo	<i>Vireo bellii arizonae</i>
Ash-throated Flycatcher	<i>Myiarchus cinerascens</i>
Audubon's Warbler	<i>Setophaga coronata auduboni</i>
Bald Eagle	<i>Haliaeetus leucocephalus</i>
Bald Eagle - Winter Population	<i>Haliaeetus leucocephalus (wintering pop.)</i>
Band-tailed Pigeon	<i>Patagioenas fasciata</i>
Barn Swallow	<i>Hirundo rustica</i>
Belted Kingfisher	<i>Megascops alcyon</i>
Bendire's Thrasher	<i>Toxostoma bendirei</i>
Bewick's Wren	<i>Thryomanes bewickii</i>
Black Phoebe	<i>Sayornis nigricans</i>
Black Vulture	<i>Coragyps atratus</i>
Black-bellied Whistling-Duck	<i>Dendrocygna autumnalis</i>
Black-chinned Hummingbird	<i>Archilochus alexandri</i>
Black-chinned Sparrow	<i>Spizella atrogularis</i>
Black-crowned Night Heron	<i>Nycticorax nycticorax</i>
Black-headed Grosbeak	<i>Pheucticus melanocephalus</i>
Black-tailed Gnatcatcher	<i>Poliophtila melanura</i>
Black-throated Blue Warbler	<i>Setophaga caerulescens</i>
Black-throated Gray Warbler	<i>Setophaga nigrescens</i>
Black-throated Sparrow	<i>Amphispiza bilineata</i>
Blue Grosbeak	<i>Passerina caerulea</i>
Blue Mockingbird	<i>Melanotis caerulescens</i>
Blue-gray Gnatcatcher	<i>Poliophtila caerulea</i>
Blue-winged Teal	<i>Spatula discors</i>
Brewer's Blackbird	<i>Euphagus cyanocephalus</i>
Brewer's Sparrow	<i>Spizella breweri</i>
Bridled Titmouse	<i>Baeolophus wollweberi</i>
Broad-billed Hummingbird	<i>Cynanthus latirostris</i>
Broad-tailed Hummingbird	<i>Selasphorus platycercus</i>
Broad-winged Hawk	<i>Buteo platypterus</i>
Bronzed Cowbird	<i>Molothrus aeneus</i>
Brown Pelican	<i>Pelecanus occidentalis</i>
Brown-crested Flycatcher	<i>Myiarchus tyrannulus</i>
Brown-headed Cowbird	<i>Molothrus ater</i>
Buff-collared Nightjar	<i>Antrostomus ridgwayi</i>
Bullock's Oriole	<i>Icterus bullockii</i>
Burrowing Owl	<i>Athene cunicularia</i>

Table D-3 Bird Species¹	
Bushtit	<i>Psaltirparus minimus</i>
Cactus Ferruginous Pygmy-owl	<i>Glaucidium brasilianum cactorum</i>
Cactus Wren	<i>Campylorhynchus brunneicapillus</i>
Canyon Towhee	<i>Melospiza fusca</i>
Canyon Wren	<i>Catherpes mexicanus</i>
Cassin's Kingbird	<i>Tyrannus vociferans</i>
Cassin's Vireo	<i>Vireo cassinii</i>
Chihuahuan Raven	<i>Corvus cryptoleucus</i>
Chipping Sparrow	<i>Spizella passerina</i>
Cliff Swallow	<i>Petrochelidon pyrrhonota</i>
Common Black Hawk	<i>Buteogallus anthracinus</i>
Common Gallinule	<i>Gallinula galeata</i>
Common Ground Dove	<i>Columbina passerina</i>
Common Merganser	<i>Mergus merganser</i>
Common Nighthawk	<i>Chordeiles minor</i>
Common Poorwill	<i>Phalaenoptilus nuttallii</i>
Common Raven	<i>Corvus corax</i>
Common Yellowthroat	<i>Geothlypis trichas</i>
Cooper's Hawk	<i>Astur cooperii</i>
Costa's Hummingbird	<i>Calypte costae</i>
Crested Caracara	<i>Caracara plancus</i>
Crissal Thrasher	<i>Toxostoma crissale</i>
Curve-billed Thrasher	<i>Toxostoma curvirostre</i>
Dark-eyed Junco	<i>Junco hyemalis</i>
Double-crested Cormorant	<i>Nannopterum auritum</i>
Dunlin	<i>Calidris alpina</i>
Dusky Flycatcher	<i>Empidonax oberholseri</i>
Dusky-capped Flycatcher	<i>Myiarchus tuberculifer</i>
Elf Owl	<i>Micrathene whitneyi</i>
Eurasian Collared-Dove	<i>Streptopelia decaocto</i>
European Starling	<i>Sturnus vulgaris</i>
Ferruginous Hawk	<i>Buteo regalis</i>
Gambel's (Western Taiga) White-crowned Sparrow	<i>Zonotrichia leucophrys gambelii</i>
Gambel's Quail	<i>Callipepla gambelii</i>
Gila Woodpecker	<i>Melanerpes uropygialis</i>
Gilded Flicker	<i>Colaptes chrysoides</i>
Golden Eagle	<i>Aquila chrysaetos</i>
Gould's Turkey	<i>Meleagris gallopavo mexicana</i>
Gray Catbird	<i>Dumetella carolinensis</i>
Gray Flycatcher	<i>Empidonax wrightii</i>
Gray Hawk	<i>Buteo plagiatus</i>
Gray Vireo	<i>Vireo vicinior</i>
Great Blue Heron	<i>Ardea herodias</i>
Great Egret	<i>Ardea alba</i>
Great Horned Owl	<i>Bubo virginianus</i>
Greater Roadrunner	<i>Geococcyx californianus</i>
Greater Yellowlegs	<i>Tringa melanoleuca</i>
Great-tailed Grackle	<i>Quiscalus mexicanus</i>
Green Heron	<i>Butorides virescens</i>
Green-tailed Towhee	<i>Pipilo chlorurus</i>
Hammond's Flycatcher	<i>Empidonax hammondi</i>

Table D-3
Bird Species¹

Harris's Hawk	<i>Parabuteo unicinctus</i>
Hepatic Tanager	<i>Piranga flava</i>
Hermit Thrush	<i>Catharus guttatus</i>
Hermit Warbler	<i>Setophaga occidentalis</i>
Hooded Oriole	<i>Icterus cucullatus</i>
Horned Lark	<i>Eremophila alpestris</i>
House Finch	<i>Haemorhous mexicanus</i>
House Sparrow	<i>Passer domesticus</i>
Hutton's Vireo	<i>Vireo huttoni</i>
Inca Dove	<i>Columbina inca</i>
Indigo Bunting	<i>Passerina cyanea</i>
Juniper Titmouse	<i>Baeolophus ridgwayi</i>
Killdeer	<i>Charadrius vociferus</i>
Ladder-backed Woodpecker	<i>Dryobates scalaris</i>
Lark Bunting	<i>Calamospiza melanocorys</i>
Lark Sparrow	<i>Chondestes grammacus</i>
Lazuli Bunting	<i>Passerina amoena</i>
Least Bittern	<i>Botaurus exilis</i>
LeConte's Thrasher	<i>Toxostoma lecontei</i>
Lesser Goldfinch	<i>Spinus psaltria</i>
Lesser Nighthawk	<i>Chordeiles acutipennis</i>
Lincoln's Sparrow	<i>Melospiza lincolni</i>
Loggerhead Shrike	<i>Lanius ludovicianus</i>
Long-eared Owl	<i>Asio otus</i>
Louisiana Waterthrush	<i>Parkesia motacilla</i>
Lucy's Warbler	<i>Leiothlypis luciae</i>
MacGillivray's Warbler	<i>Geothlypis tolmiei</i>
Mallard	<i>Anas platyrhynchos</i>
Marsh Wren	<i>Cistothorus palustris</i>
Mexican Duck	<i>Anas diazi</i>
Mexican Jay	<i>Aphelocoma wollweberi</i>
Mexican Spotted Owl	<i>Strix occidentalis lucida</i>
Mississippi Kite	<i>Ictinia mississippiensis</i>
Mountain West White-crowned Sparrow	<i>Zonotrichia leucophrys oriantha</i>
Mourning Dove	<i>Zenaida macroura</i>
Nashville Warbler	<i>Leiothlypis ruficapilla</i>
Northern Beardless-Tyrannulet	<i>Camptostoma imberbe</i>
Northern Cardinal	<i>Cardinalis cardinalis</i>
Northern Flicker	<i>Colaptes auratus</i>
Northern Harrier	<i>Circus hudsonius</i>
Northern House Wren	<i>Troglodytes aedon</i>
Northern Mockingbird	<i>Mimus polyglottos</i>
Northern Rough-winged Swallow	<i>Stelgidopteryx serripennis</i>
Northern Shoveler	<i>Spatula clypeata</i>
Northern Waterthrush	<i>Parkesia noveboracensis</i>
Olive Warbler	<i>Peucedramus taeniatus</i>
Olive-sided Flycatcher	<i>Contopus cooperi</i>
Orange-crowned Warbler	<i>Leiothlypis celata</i>
Orchard Oriole	<i>Icterus spurius</i>
Osprey	<i>Pandion haliaetus</i>
Ovenbird	<i>Seiurus aurocapilla</i>

Table D-3 Bird Species ¹	
Peregrine Falcon	<i>Falco peregrinus</i>
Phainopepla	<i>Phainopepla nitens</i>
Pied-billed Grebe	<i>Podilymbus podiceps</i>
Pine Siskin	<i>Spinus pinus</i>
Plumbeous Vireo	<i>Vireo plumbeus</i>
Prairie Falcon	<i>Falco mexicanus</i>
Purple Martin	<i>Progne subis</i>
Pyrrhuloxia	<i>Cardinalis sinuatus</i>
Red-naped Sapsucker	<i>Sphyrapicus nuchalis</i>
Red-shouldered Hawk	<i>Buteo lineatus</i>
Red-tailed Hawk	<i>Buteo jamaicensis</i>
Red-winged Blackbird	<i>Agelaius phoeniceus</i>
Ring-necked Duck	<i>Aythya collaris</i>
Rock Pigeon	<i>Columba livia</i>
Rock Wren	<i>Salpinctes obsoletus</i>
Ruby-crowned Kinglet	<i>Corthylio calendula</i>
Rufous Hummingbird	<i>Selasphorus rufus</i>
Rufous-crowned Sparrow	<i>Aimophila ruficeps</i>
Rufous-winged Sparrow	<i>Peucaea carpalis</i>
Sage Thrasher	<i>Oreoscoptes montanus</i>
Sagebrush Sparrow	<i>Artemisiospiza nevadensis</i>
Savannah Sparrow	<i>Passerculus sandwichensis</i>
Say's Phoebe	<i>Sayornis saya</i>
Scott's Oriole	<i>Icterus parisorum</i>
Sharp-shinned Hawk	<i>Accipiter striatus</i>
Snowy Egret	<i>Egretta thula</i>
Song Sparrow	<i>Melospiza melodia</i>
Sora	<i>Porzana carolina</i>
Southwestern Willow Flycatcher	<i>Empidonax traillii extimus</i>
Spotted Sandpiper	<i>Actitis macularius</i>
Spotted Towhee	<i>Pipilo maculatus</i>
Sulphur-bellied Flycatcher	<i>Myiodynastes luteiventris</i>
Summer Tanager	<i>Piranga rubra</i>
Swainson's Hawk	<i>Buteo swainsoni</i>
Swainson's Thrush	<i>Catharus ustulatus</i>
Thick-billed Kingbird	<i>Tyrannus crassirostris</i>
Townsend's Warbler	<i>Setophaga townsendi</i>
Tree Swallow	<i>Tachycineta bicolor</i>
Tropical Kingbird	<i>Tyrannus melancholicus</i>
Tufted Flycatcher	<i>Mitrephanes phaeocercus</i>
Turkey Vulture	<i>Cathartes aura</i>
Varied Bunting	<i>Passerina versicolor</i>
Verdin	<i>Auriparus flaviceps</i>
Vermilion Flycatcher	<i>Pyrocephalus rubinus</i>
Vesper Sparrow	<i>Pooecetes gramineus</i>
Violet-green Swallow	<i>Tachycineta thalassina</i>
Virginia Rail	<i>Rallus limicola</i>
Virginia's Warbler	<i>Leiothlypis virginiae</i>
Western Bluebird	<i>Sialia mexicana</i>

Table D-3 Bird Species ¹	
Western Burrowing Owl	<i>Athene cunicularia hypugaea</i>
Western Cattle-Egret	<i>Ardea ibis</i>
Western Flycatcher	<i>Empidonax difficilis</i>
Western Grebe	<i>Aechmophorus occidentalis</i>
Western Kingbird	<i>Tyrannus verticalis</i>
Western Meadowlark	<i>Sturnella neglecta</i>
Western Screech-owl	<i>Megascops kennicottii</i>
Western Tanager	<i>Piranga ludoviciana</i>
Western Warbling Vireo	<i>Vireo swainsoni</i>
Western Wood-Pewee	<i>Contopus sordidulus</i>
Whiskered Screech-owl	<i>Megascops trichopsis</i>
White-breasted Nuthatch	<i>Sitta carolinensis</i>
White-crowned Sparrow	<i>Zonotrichia leucophrys</i>
White-faced Ibis	<i>Plegadis chihi</i>
White-throated Swift	<i>Aeronautes saxatalis</i>
White-winged Dove	<i>Zenaida asiatica</i>
Wild Turkey	<i>Meleagris gallopavo</i>
Willow Flycatcher	<i>Empidonax traillii</i>
Wilson's Warbler	<i>Cardellina pusilla</i>
Woodhouse's Scrub-jay	<i>Aphelocoma woodhouseii</i>
Yellow Warbler	<i>Setophaga petechia</i>
Yellow-billed Cuckoo (Western DPS)	<i>Coccyzus americanus</i>
Yellow-breasted Chat	<i>Icteria virens</i>
Yellow-eyed Junco	<i>Junco phaeonotus</i>
Yellow-rumped Warbler	<i>Setophaga coronata</i>
Yuma Ridgway's Rail	<i>Rallus obsoletus yumanensis</i>
Zone-tailed Hawk	<i>Buteo albonotatus</i>
¹ AGFD, 2026.	

Table D-4 Invertebrate Species ¹	
Common Name	Scientific Name
Empress Leilia	<i>Asterocampa leilia</i>
Galiuro Talussnail	<i>Sonorella galiurensis</i>
Ingham's Southwestern Orangetip	<i>Anthocharis thoosa inghami</i>
Maricopa Tiger Beetle	<i>Cicindela oregona maricopa</i>
Monarch	<i>Danaus plexippus</i>
Picacho Talussnail	<i>Sonorella simmonsii</i>
Queen	<i>Danaus gilippus</i>
Red Swamp Crawfish	<i>Procambarus clarkii</i>
Southwest Spring Firefly	<i>Bicellonycha wickershamorum wickershamorum</i>
Superstition Mountains Talussnail	<i>Sonorella superstitionis</i>
Tortolita Talussnail	<i>Sonorella tortillita</i>
Ursine Giant skipper	<i>Megathymus ursus ursus</i>
Virile Crayfish	<i>Faxonius virilis</i>
White-lined Sphinx	<i>Hyles lineata</i>
¹ AGFD, 2026.	

Table D-5
Mammal Species¹

Common Name	Scientific Name
American Badger	<i>Taxidea taxus</i>
American Beaver	<i>Castor canadensis</i>
American Black Bear	<i>Ursus americanus</i>
Antelope Jackrabbit	<i>Lepus alleni</i>
Arizona Cotton Rat	<i>Sigmodon arizonae</i>
Arizona Myotis	<i>Myotis occultus</i>
Arizona Pocket Mouse	<i>Perognathus amplus</i>
Bailey's Pocket Mouse	<i>Chaetodipus baileyi</i>
Big Brown Bat	<i>Eptesicus fuscus</i>
Big Free-tailed Bat	<i>Nyctinomops macrotis</i>
Bighorn Sheep	<i>Ovis canadensis</i>
Black-tailed Jackrabbit	<i>Lepus californicus</i>
Bobcat	<i>Lynx rufus</i>
Botta's Pocket Gopher	<i>Thomomys bottae</i>
Brazilian Free-tailed Bat	<i>Tadarida brasiliensis</i>
Brush Mouse	<i>Peromyscus boylii</i>
Cactus Mouse	<i>Peromyscus eremicus</i>
California Leaf-nosed Bat	<i>Macrotus californicus</i>
California Myotis	<i>Myotis californicus</i>
Canyon Bat	<i>Parastrellus hesperus</i>
Cave Myotis	<i>Myotis velifer</i>
Cliff Chipmunk	<i>Neotamias dorsalis</i>
Collared Peccary	<i>Dicotyles tajacu</i>
Common Gray Fox	<i>Urocyon cinereoargenteus</i>
Coyote	<i>Canis latrans</i>
Crawford's Desert Shrew	<i>Notiosorex crawfordi</i>
Deer Mouse	<i>Peromyscus maniculatus</i>
Desert Cottontail	<i>Sylvilagus audubonii</i>
Desert Kangaroo Rat	<i>Dipodomys deserti</i>
Desert Red Bat	<i>Lasiurus frantzii</i>
Desert Spotted Skunk	<i>Spilogale leucoparia</i>
Feral Burro	<i>Equus asinus</i>
Feral Horse	<i>Equus caballus</i>
Fringed Myotis	<i>Myotis thysanodes</i>
Fulvous Harvest Mouse	<i>Reithrodontomys fulvescens</i>
Greater Western Bonneted Bat	<i>Eumops perotis californicus</i>
Harris' Antelope Squirrel	<i>Ammospermophilus harrisi</i>
Hispid Cotton Rat	<i>Sigmodon hispidus</i>
Hispid Pocket Mouse	<i>Chaetodipus hispidus</i>
Hoary Bat	<i>Lasiurus cinereus</i>
Hog-nosed Skunk	<i>Conepatus leuconotus leuconotus</i>

Table D-5 Mammal Species ¹	
Holzner's Cottontail	<i>Sylvilagus holzneri</i>
Hooded Skunk	<i>Mephitis macroura</i>
House Mouse	<i>Mus musculus</i>
Kit Fox	<i>Vulpes macrotis</i>
Lesser Long-nosed Bat	<i>Leptonycteris yerbabuenae</i>
Long-legged Myotis	<i>Myotis volans</i>
Merriam's Kangaroo Rat	<i>Dipodomys merriami</i>
Mexican Long-tongued Bat	<i>Choeronycteris mexicana</i>
Mexican Opossum	<i>Didelphis virginiana californica</i>
Mexican Woodrat	<i>Neotoma mexicana</i>
Mountain Lion	<i>Puma concolor</i>
Mule Deer	<i>Odocoileus hemionus</i>
Northern Raccoon	<i>Procyon lotor</i>
Ocelot	<i>Leopardus pardalis</i>
Ord's Kangaroo Rat	<i>Dipodomys ordii</i>
Pale Townsend's Big-eared Bat	<i>Corynorhinus townsendii pallescens</i>
Pallid Bat	<i>Antrozous pallidus</i>
Plains Harvest Mouse	<i>Reithrodontomys montanus</i>
Pocketed Free-tailed Bat	<i>Nyctinomops femorosaccus</i>
Ringtail	<i>Bassariscus astutus</i>
Rock Pocket Mouse	<i>Chaetodipus intermedius</i>
Rock Squirrel	<i>Otospermophilus variegatus</i>
Round-tailed Ground Squirrel	<i>Xerospermophilus tereticaudus</i>
Silky Pocket Mouse	<i>Perognathus flavus</i>
Silver-haired Bat	<i>Lasionycteris noctivagans</i>
Sonoran Desert Pocket Mouse	<i>Chaetodipus penicillatus</i>
Sonoran Pronghorn	<i>Antilocapra americana sonoriensis</i>
Southern Grasshopper Mouse	<i>Onychomys torridus</i>
Southwestern Myotis	<i>Myotis auriculus</i>
Striped Skunk	<i>Mephitis mephitis</i>
Western Harvest Mouse	<i>Reithrodontomys megalotis</i>
Western Small-footed Myotis	<i>Myotis ciliolabrum</i>
Western White-throated Woodrat	<i>Neotoma albigula</i>
Western Yellow Bat	<i>Lasiurus xanthinus</i>
White-footed Mouse	<i>Peromyscus leucopus</i>
White-nosed Coati	<i>Nasua narica</i>
White-tailed Deer	<i>Odocoileus virginianus</i>
Yavapai Arizona Pocket Mouse	<i>Perognathus amplus amplus</i>
Yuma Myotis	<i>Myotis yumanensis</i>
¹ AGFD, 2026.	

Table D-5 Plant Species ¹	
Common Name	Scientific Name
Acuna Cactus	<i>Echinomastus erectocentrus</i> var. <i>acunensis</i>
Aravaipa Sage	<i>Salvia amissa</i>
Aravaipa Woodfern	<i>Pelazoneuron puberulum</i> var. <i>sonorense</i>
Arizona False Pennyroyal	<i>Hedeoma dentata</i>
Arizona Hedgehog Cactus	<i>Echinocereus arizonicus</i> ssp. <i>arizonicus</i>
Beavertail Prickly-pear	<i>Opuntia basilaris</i>
Cactus-apple	<i>Opuntia engelmannii</i>
California Willowherb	<i>Epilobium ravenii</i>
Catalina Beardtongue	<i>Penstemon discolor</i>
Chihuahuan Sedge	<i>Carex chihuahuensis</i>
Coastal Woodfern	<i>Dryopteris arguta</i>
Cochise Sedge	<i>Carex ultra</i>
Compass Barrel Cactus	<i>Ferocactus wislizeni</i>
Copper Zephyr Lily	<i>Zephyranthes longifolia</i>
Desert Barrel Cactus	<i>Ferocactus cylindraceus</i>
Desert Tansy-aster	<i>Leucosyris arida</i>
Dune Blazingstar	<i>Mentzelia longiloba</i> var. <i>longiloba</i>
Fendler Hedgehog-cactus	<i>Echinocereus fendleri</i>
Flannel Bush	<i>Fremontodendron californicum</i>
Gila Rock Daisy	<i>Laphamia gilensis</i> var. <i>gilensis</i>
Graham's Nipple Cactus	<i>Mammillaria grahamii</i>
Hairy Water Clover	<i>Marsilea vestita</i>
Hohokam Agave	<i>Agave murpheyi</i>
Huachuca Water-umbel	<i>Lilaeopsis schaffneriana</i> ssp. <i>recurva</i>
Lobed Fleabane	<i>Erigeron lobatus</i>
Lotebush	<i>Ziziphus obtusifolia</i> var. <i>obtusifolia</i>
Lyre-leaved Twistflower	<i>Streptanthus carinatus</i>
Magenta-flower Hedgehog-cactus	<i>Echinocereus fasciculatus</i>
Mapleleaf False Snapdragon	<i>Mabrya acerifolia</i>
Mexican Broomspurge	<i>Euphorbia gracillima</i>
Mexican Gama Grass	<i>Tripsacum lanceolatum</i>
Mexican Milkweed	<i>Asclepias linaria</i>
Miniature Suncup	<i>Camissoniopsis micrantha</i>
Mojave Milkweed	<i>Asclepias nyctaginifolia</i>
Mountain Spikerush	<i>Eleocharis montana</i>
Needle-spined Pineapple Cactus	<i>Echinomastus erectocentrus</i> var. <i>erectocentrus</i>
New Mexican Prickly-pear	<i>Opuntia phaeacantha</i>
Nichol Turk's Head Cactus	<i>Echinocactus horizonthalonius</i> var. <i>nicholii</i>
Nichol's Hedgehog Cactus	<i>Echinocereus nicholii</i>
Organ Pipe Cactus	<i>Stenocereus thurberi</i>
Pima Indian Mallow	<i>Abutilon parishii</i>

Table D-5 Plant Species ¹	
Pinkflower Hedgehog Cactus	<i>Echinocereus bonkerae</i>
Pringle Popcorn-flower	<i>Plagiobothrys pringlei</i>
Pringle's Fleabane	<i>Erigeron pringlei</i>
Redflower Onion	<i>Allium rhizomatum</i>
Rush Milkweed	<i>Asclepias subulata</i>
San Carlos Wild-buckwheat	<i>Eriogonum capillare</i>
Santa Rita Hedgehog Cactus	<i>Echinocereus santaritensis</i>
Sierra Ancha Fleabane	<i>Erigeron anchana</i>
Small-flowered Flameflower	<i>Phemeranthus parviflorus</i>
Spider Milkweed	<i>Asclepias asperula</i>
Spotted Wintergreen	<i>Chimaphila maculata</i>
Stag-horn Cholla	<i>Opuntia versicolor</i>
Thornber Fishhook Cactus	<i>Mammillaria thornberi</i>
Thread-leaf Giant Hyssop	<i>Agastache rupestris</i>
Toumey Agave	<i>Agave toumeyana</i> var. <i>bella</i>
Tumamoc Globeberry	<i>Tumamoca macdougalii</i>
Varied Fishhook Cactus	<i>Mammillaria viridiflora</i>
Velvet Mesquite	<i>Neltuma velutina</i>
Washoe Suncup	<i>Camissonia pusilla</i>
Western Sandparsley	<i>Spermolepis gigantea</i>
Wright's Snakeweed	<i>Gutierrezia wrightii</i>
Yavapai Blazingstar	<i>Mentzelia longiloba</i> var. <i>yavapaiensis</i>
¹ AGFD, 2026.	

Table D-7
Reptile Species¹

Common Name	Scientific Name
Arizona Black Rattlesnake	<i>Crotalus cerberus</i>
Arizona Glossy Snake	<i>Arizona elegans noctivaga</i>
Banded Sandsnake	<i>Chilomeniscus cinctus</i>
Bezy's Night Lizard	<i>Xantusia bezyi</i>
Big Bend Patch-nosed Snake	<i>Salvadora hexalepis deserticola</i>
Black-necked Gartersnake	<i>Thamnophis cyrtopsis</i>
Black-tailed Rattlesnake	<i>Crotalus molossus</i>
California Kingsnake	<i>Lampropeltis californiae</i>
Checkered Gartersnake	<i>Thamnophis marcianus</i>
Chihuahuan Greater Earless Lizard	<i>Cophosaurus texanus scitulus</i>
Clark's Spiny Lizard	<i>Sceloporus clarkii</i>
Coachwhip	<i>Masticophis flagellum</i>
Common Chuckwalla	<i>Sauromalus ater</i>
Common Lesser Earless Lizard	<i>Holbrookia maculata</i>
Common Side-blotched Lizard	<i>Uta stansburiana</i>
Desert Grassland Whiptail	<i>Aspidoscelis uniparens</i>
Desert Iguana	<i>Dipsosaurus dorsalis</i>
Desert Mud Turtle	<i>Kinosternon sonoriense sonoriense</i>
Desert Nightsnake	<i>Hypsiglena chlorophaea</i>
Desert Patch-nosed Snake	<i>Salvadora hexalepis hexalepis</i>
Desert Spiny Lizard	<i>Sceloporus magister</i>
Eastern Collared Lizard	<i>Crotaphytus collaris</i>
Eastern Fence Lizard	<i>Sceloporus undulatus</i>
Eastern Kingsnake	<i>Lampropeltis getula</i>
Giant Spotted Whiptail	<i>Aspidoscelis stictogrammus</i>
Gila Monster	<i>Heloderma suspectum</i>
Glossy Snake	<i>Arizona elegans</i>
Gophersnake	<i>Pituophis catenifer</i>
Great Basin Collared Lizard	<i>Crotaphytus bicinctores</i>
Greater Earless Lizard	<i>Cophosaurus texanus</i>
Greater Short-horned Lizard	<i>Phrynosoma hernandesi</i>
Long-nosed Leopard Lizard	<i>Gambelia wislizenii</i>
Long-nosed Snake	<i>Rhinocheilus lecontei</i>
Long-tailed Brush Lizard	<i>Urosaurus graciosus</i>
Madrean Alligator Lizard	<i>Elgaria kingii</i>
Mediterranean Gecko	<i>Hemidactylus turcicus</i>
Mohave Desert Sidewinder	<i>Crotalus cerastes cerastes</i>
Mohave Rattlesnake	<i>Crotalus scutulatus</i>
Mountain Patch-nosed Snake	<i>Salvadora grahamiae</i>
New Mexico Threadsake	<i>Rena dissecta</i>
Northern Desert Nightsnake	<i>Hypsiglena chlorophaea deserticola</i>

Table D-7 Reptile Species ¹	
Ornate Box Turtle	<i>Terrapene ornata</i>
Ornate Tree Lizard	<i>Urosaurus ornatus</i>
Plateau Fence Lizard	<i>Sceloporus tristichus</i>
Pond Slider	<i>Trachemys scripta</i>
Prairie Rattlesnake	<i>Crotalus viridis</i>
Red Racer	<i>Masticophis flagellum piceus</i>
Red-backed Whiptail	<i>Aspidoscelis xanthonotus</i>
Regal Horned Lizard	<i>Phrynosoma solare</i>
Resplendent Shovel-nosed Snake	<i>Chionactis annulata</i>
Ring-necked Snake	<i>Diadophis punctatus</i>
Saddled Leaf-nosed Snake	<i>Phyllorhynchus browni</i>
Schott's Tree Lizard	<i>Urosaurus ornatus schottii</i>
Sidewinder	<i>Crotalus cerastes</i>
Smith's Black-headed Snake	<i>Tantilla hobartsmithi</i>
Snapping Turtle	<i>Chelydra serpentina</i>
Sonoran Coachwhip	<i>Masticophis flagellum cingulum</i>
Sonoran Coralsnake	<i>Micruroides euryxanthus</i>
Sonoran Desert Tortoise	<i>Gopherus morafkai</i>
Sonoran Gophersnake	<i>Pituophis catenifer affinis</i>
Sonoran Lyresnake	<i>Trimorphodon lambda</i>
Sonoran Sidewinder	<i>Crotalus cerastes cercobombus</i>
Sonoran Spotted Whiptail	<i>Aspidoscelis sonorae</i>
Sonoran Whipsnake	<i>Masticophis bilineatus</i>
Southwestern Fence Lizard	<i>Sceloporus cowlesi</i>
Southwestern Speckled Rattlesnake	<i>Crotalus pyrrhus</i>
Spiny Softshell	<i>Apalone spinifera</i>
Spotted Leaf-nosed Snake	<i>Phyllorhynchus decurtatus</i>
Striped Whipsnake	<i>Masticophis taeniatus</i>
Tiger Rattlesnake	<i>Crotalus tigris</i>
Tiger Whiptail	<i>Aspidoscelis tigris</i>
Western Banded Gecko	<i>Coleonyx variegatus</i>
Western Diamond-backed Rattlesnake	<i>Crotalus atrox</i>
Western Groundsnake	<i>Sonora semiannulata</i>
Western Patch-nosed Snake	<i>Salvadora hexalepis</i>
Western Shovel-nosed Snake	<i>Chionactis occipitalis</i>
Western Side-blotched Lizard	<i>Uta stansburiana elegans</i>
Western Threadsnake	<i>Rena humilis</i>
Zebra-tailed Lizard	<i>Callisaurus draconoides</i>
¹ AGFD, 2026.	

EXHIBIT E

**SCENIC AREAS, HISTORIC SITES AND STRUCTURES,
ARCHAEOLOGICAL SITES**

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

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

VISUAL RESOURCES

Sensitive Viewpoints

Sensitive viewpoints consist of locations from which a significant number of individuals having some regard for the integrity of visual resources would view a landscape and be exposed to the presence of the Salt River Project Agricultural Improvement and Power District (SRP) proposed Marigold Transmission Project (Project) which would consist of two double-circuit 230 kilovolt (kV) transmission lines. There are no designated scenic areas within the vicinity of the Project. Potential sensitive viewpoints in the Project Area occur along transportation corridors within proximity of vacant, industrial, agricultural, and residential land uses, from residential land uses and sensitive visual receptors or locations where the Project could be seen.

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

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

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

Existing Conditions

Two representative key viewpoints, or Key Observation Points (KOPs), were selected within the Project Area to depict the existing visual quality. The KOPs were selected based on viewers viewing the Project from the closest sensitive visual receptors, residences and along nearby major transportation corridors. Photos were taken during field reconnaissance in January 2026. The locations of the KOPs and simulations are included in figures at the end of this section in **Exhibit E-1**. **Figure E-1** depicts a map with the locations of the two KOPs. The existing conditions and the potential visual effects of the proposed Project components are shown for the KOPs in **Figures E-2** and **E-3**.

KOP 1 (Figure E-2a) North Stanfield Road looking Northwest

KOP 1 was taken from North Stanfield Road looking northwest. KOP 1 represents the view from a transportation corridor in close proximity to the Project. The view shows North Stanfield Road in the foreground and vacant land, commercial structures and mountains in the background. The visual quality is classified as mixed rural and commercial in character.

KOP 2 (Figure E-2a) North Fuqua Road & Highway 84 – Looking Southwest

KOP 2 was taken from the corner of North Fuqua Road and Highway 84 looking southwest. KOP 2 represents the view from a major transportation corridor in close proximity to the Project. The view shows Highway 84 in the foreground, agricultural fields and transmission lines in the midground, and transmission lines and mountains in the background. The visual quality is classified as rural in character.

Potential Effects

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

Visual resources would be affected by introducing two parallel double-circuit 230 kV transmission lines into the existing visual landscape. The effects of introducing these elements into the landscape would be apparent when viewed from sensitive viewpoints. The Project would introduce new elements into the landscape; however, they would not appreciably alter the existing form, line, color, and texture which characterize the existing landscape, and they are consistent with the existing infrastructure in the area.

Visual effects associated with each of the KOPs are described below and shown in **Figures E-2b** and **E-3b** (visual simulations). These simulations show the views from the KOPs after construction of the Project.

KOP 1 (Figure E-2b) North Stanfield Road looking Northwest

KOP 1 was taken from North Stanfield Road, looking northwest. KOP 1 represents the view from a transportation corridor in close proximity to the Project. The proposed view depicts no change to the foreground or middle ground and introduces Project components in the background. The

Project components visible from this viewpoint include the Solar Array, Battery Energy Storage System (BESS), BESS Collector Substation, and transmission lines. These proposed structures would alter the visual characteristics of the existing visual landscape from a rural character to a utility corridor with mixed commercial uses. Project structures would be visible to motorists on North Stanfield Road, whose viewpoint would be temporary in nature. Therefore, perceptible visual contrast would be moderate from this viewshed due to the duration of the viewer.

KOP 2 (Figure E-3b) North Fuqua Road & Highway 84 – Looking Southwest

KOP 2 was taken from the corner of North Fuqua Road and Highway 84 looking southwest. KOP 2 represents the view from a major transportation corridor and rural residences in close proximity to the Project. The proposed view depicts no change to the foreground or middle ground and introduces Project components in the background. The Project components visible from this viewpoint include the Solar Array. These proposed solar structures would alter the visual characteristics of the existing visual landscape by adding commercial uses into the viewshed. Project structures would be visible to residents along Highway 84 and motorists on both North Fuqua Road and Highway 84, whose viewpoint would be temporary in nature. Therefore, perceptible visual contrast would be moderate from this viewshed.

HISTORIC AND ARCHAEOLOGICAL RESOURCES

A Class I Cultural Resources inventory was prepared for the Project to provide a basis to evaluate the potential for cultural resources impacts within the Project Area as well as to provide baseline cultural resources information to support consultation with agencies, as necessary, on potential mitigation requirements. The Class I Cultural Report is included in **Exhibit E-1** and includes information on the overall Project. Correspondence with the Native American Tribes and Arizona State Historic Preservation Office (SHPO) are included in **Exhibit E-2**. A Class III survey for portions of the Project Area is currently underway, and any unsurveyed areas will be completed following issuance of a CEC. Survey results will be submitted to all consulting parties for concurrence prior to any ground disturbing or construction activities.

Existing Conditions

The Project Area falls on the southwestern edge of what is commonly referred to as the Phoenix Basin, near the Santa Rosa Wash. This area has a human occupation that is generally accepted to span at least the last 12,000 years. The record of human habitation is generally broken down into recognizable prehistoric and historic periods. The following discussion of these periods is meant to be general and does not include all periods of human occupation. More detailed summaries of the history and prehistory of the area can be found in Bayman (2001); Berry and Marmaduke (1982); Cordell (1984); Fish (1989); Fish and Fish (2008); Gilpin and Phillips (1998); Gumerman (1991); Haynes (1986); Myrick (1980); Reid and Whittlesey (1997); Sheridan (1992, 1995); Spicer (1962); and SWCA (2003). The history of the Project Area is described in detail in the Class I Cultural Report included in **Exhibit E-1**.

Previous Cultural Resources Survey

The records search of the Project Area combined with a 1-mile buffer was examined to identify any potential for impacts to cultural resources associated with the Project. The ASM records

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search, which included the mapped locations of prior projects, revealed that 22 investigations have been conducted within one mile of the Project Area. Thirteen of these investigations were pedestrian surveys that intersect the Project Area (**Table E-1**). Conversations with SRP indicate that pedestrian surveys of the entirety of the Project Area are currently being conducted by archaeologists contracted with SRP for the Marigold Energy Center Project, one of which is included in **Table E-1**.

Table E-1 – Previous Investigations in Project Area				
Report ID	Year	Author	Project	Company
1984-219.ASM	1984	Marmaduke, William S.	CAP-DD SANTA ROSA CANAL PHASE A, TASK 6 AND 21.	Northland Research, Inc. Flagstaff
1985-200.ASM	1986	Hackbarth, Mark R., and Lanita Van Nimwegen	Stanfield-Maricopa Laterals, Task 28 and 33 - Maricopa-Stanfield Irrigation District East Main Canal	Northland Research, Inc. Flagstaff
1985-226.ASM	1985	Plog, Fred & others	All American Pipeline Right-of-Way	New Mexico State University
1986-20.ASM	1986	Quillian, Patricia M.	Maricopa-Stanfield Laterals	Northland Research, Inc. Tempe
1988-145.ASM	1989	MacDonald, Lynne B.	Loel Ranch Canals, Maricopa-Stanfield Irrigation District	BOR, Phoenix
1988-233.ASM	1988	MacDonald, Lynne B.	Maricopa-Stanfield Irrigation District, Pressure Pipeline	BOR, Phoenix
1996-301.ASM	1996	Wright, Thomas E.	Interstate 8/Casa Grande	Archaeological Research Services, Inc.
2006-18.ASM	2006	Howell, Todd	Transwestern Pipeline Phoenix Extension - Ashfork to Coolidge	TRC Environmental
2008-85.ASM	2008	Fahrni, Grant	APS On-Call Cultural Resources Surveys	Logan Simpson Design Inc.
2012-594.ASM	2000	North, Chris D.	All American Pipeline Survey/El Paso Natural Gas Line No. 2000	SWCA Environmental Consultants, Inc. Flagstaff
2015-83.ASM	2015	Hill, Rebecca J. and Leigh Davidson	Barnes Road and Fuqua Road	Logan Simpson Design Inc.
2022-419.ASM	2022	Brack, M. L.	Zinke Irrigation Pivots Class III	Tierra Right-of-Way Services, LTD
2025-537.ASM	2026	Dall, Fulwood and Rayle	Marigold Phase I Cultural Survey project	TYPSA, Inc.
2026-84.ASM	2026	Cooper et al.	Marigold Phase II Cultural Survey Project	Logan Simpson

The ASM records search also indicated that a total of 38 previously recorded cultural resource sites have been identified within the one-mile buffer of the Project Area, of which seven are historic and 31 are prehistoric. Five of these sites have been determined eligible, and one

determined not eligible for NRHP by SHPO, and another seven have been recommended eligible, and three recommended not eligible for NRHP. Nine of the 38 sites within the one-mile buffer of the Project Area are within or adjacent to the Project Area and are detailed below and in **Table E-2** (in bold).

Table E-2 Cultural Resources within or adjacent to the Project Area (sites in bold are recorded with ASM)				
Site #	Site Type	Site Description	NRHP Status	Location
AZ AA:1:66(ASM) (Shelltown)	Prehistoric	Hohokam era habitation Site with burials	Recommended eligible (Hackbarth 1990)	Within Project Area
AZ AA:1:126(ASM)	Historic	Historic Stanfield Road	Determined not eligible (SHPO 2018)	Within Project Area
AZ AA:1:171(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within Project Area
AZ AA:1:172(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within Project Area
AZ AA:1:173(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within Project Area
AZ AA:1:497(ASM) (Shelltown)	Prehistoric	Hohokam era artifact scatter, to be consolidated with AZ AA:1:66(ASM)	Recommended eligible (Bellavia 2006)	Adjacent to Project Area
AZ AA:1:502(ASM) (Shelltown)	Prehistoric	Hohokam era habitation site, to be consolidated with AZ AA:1:66(ASM)	Recommended eligible (Bellavia 2006)	Adjacent to Project Area
AZ AA:2:118(ASM)	Historic	Historic Highway 84	Portions determined eligible (SHPO 2009)	Adjacent to Project Area
AZ Z:4:24(ASM)	Prehistoric	Hohokam era artifact scatter	Recommended not eligible (Hackbarth 1990)	Adjacent to Project Area
AZ AA:1:1 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic open dump	Prehistoric: unevaluated Historic: recommended not eligible (Dall et al 2026)	Within Project Area
AZ AA:1:2 (TYP SA)	Historic	Hohokam era artifact scatter; historic open dump	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within Project Area
AZ AA:1:3 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic agricultural processing facility	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within Project Area
AZ AA:1:4 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic open dump	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within Project Area
AZ AA:1:5 (TYP SA)	Prehistoric	Hohokam era artifact scatter	Recommended not eligible (Dall et al 2026)	Within Project Area
Montgomery Farms District (TYP SA)	Historic	Architectural components of historic farm complex	Recommended not eligible (Dall et al 2026)	Within Project Area
HIUS-1 (TYP SA)	Historic	16 MSIDD Lateral System canals	Recommended not eligible (Dall et al 2026)	Within Project Area
HIUS-2 (TYP SA)	Historic	Unnamed Agricultural Road Network	Recommended not eligible (Dall et al 2026)	Within Project Area

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HIUS-3 (TYP SA)	Historic	4 Earthen Levees	Recommended not eligible (Dall et al 2026)	Within Project Area
FN-034 (LS)	Historic	Historic features and artifacts	Not yet evaluated	Within Project Area
FN-075 (LS)	Historic	Historic features and artifacts	Not yet evaluated	Within Project Area
FN-089 (LS)	Historic and Prehistoric	Euro American structural/agricultural features and Hohokam artifact scatter	Not yet evaluated	Within Project Area
FN-115 (LS)	Historic	Historic house and artifacts	Not yet evaluated	Within Project Area
IO-116, 122, 127, 131, 132, 133 (LS)	Historic	Abandoned ditches	Not yet evaluated	Within Project Area

AZ AA:1:66(ASM): This site, called Shelltown by archaeologists and first recorded in 1984, as an artifact scatter of moderate density surrounding at least two dozen areas of very high artifact density. The site is associated with the Hohokam Pioneer through Classic periods. Pothunting uncovered whole rooms with adobe walls as well as possible inhumation and cremation burials. Ceramics recorded include Gila and Wingfield Plain, Snaketown, Gila Butte, Santa Cruz, Sacaton, red-on-buffs, Gila and Salt Red, and others. Other artifacts recorded include ground and chipped stone, shell bracelets, debitage, raw shell and burnt bone (possibly cremations).

Test excavations and data recovery at Shelltown were conducted by Northland Research from the spring of 1985 through the spring of 1986, as part of the construction of the Santa Rosa Canal, a large distribution aqueduct, and associated delivery canals for the Maricopa-Stanfield Irrigation and Drainage District (MSIDD) (Marmaduke and Martynec 1993). The southwestern corner of Shelltown was impacted by the Santa Rosa Canal, while a smaller distribution canal of the MSIDD that connects with the Santa Rosa Canal cut through the northern edge of the mapped site. The excavations uncovered twelve cremations containing at least 15 individuals, along with ceramic jars and bowls, stone bowls and tools, shell and plant remains. Physical and relative dating placed the site to between the early to late middle A.D. 800s, and A.D. 925-1025, and also indicated that not many structures were contemporary in use, but that the total times of occupation probably spread over at least 200 years in the aggregate. However, only three percent of the site was excavated in the 1980s, and it is possible that there may be more substantial village-like settlements at Shelltown than those uncovered during excavation.

Shelltown appears to have been inhabited by specialized craftsmen – jewelry and ornament makers – and artifacts found at the site include bracelets, pendants, effigy figures, beads, and rings made from as many as 36 separate species of marine shell obtained from the Gulf of California or, in lesser degree, the Pacific Ocean; mosaic inlays and pendants of turquoise, muscovite, pyrite, copper ores, and galena; pendants and beads ground from schist and slate, or adapted from a quartz crystal. Debris left from the manufacture of the shell ornaments was present in copious amounts, giving the suggestion that this was the most frequent task engaging the energies of the resident artisans. Everything from finished ornaments as elegant as *Glycymeris* sp. shell bracelets adorned with figures, to the waste chips and grindings spun off in their making was present at Shelltown, as well as the tools required to accomplish the task, including reamers, abrading palettes, abrasive blocks, files, saws, lithic flakes, including minute micro drill bits of burinated chalcedony for

piercing the centers of minuscule shell beads. Out of the 68 houses and other structures investigated at Shelltown and the nearby Hind Site, 25 bore the ground dust and chipped flakes of worked marine shell packed into their floors or filling their trash. Fifty-nine rendered up stone tools exhibiting dustings of ground shell, and nearly all had some sort of shell manufacturing debris associated with them.

SWCA revisited the location where AZ AA:1:66(ASM) had previously been recorded. The project's report (Bellavia et al. 2006) does not include an update, and no ASM site card update was included with the project submission. The previously recorded site boundary mapped in the report is only a dot for the approximate site location, rather than the full site boundary. However, the project did record the following new sites in approximately the same location as AZ AA:1:66(ASM): AZ AA:1:495(ASM), AZ AA:1:497(ASM), AZ AA:1:498(ASM), AZ AA:1:501(ASM), and AZ AA:1:502(ASM). Per ASM, these sites will likely be consolidated under AZ AA:1:66(ASM) in the future. Additional sites recorded by SWCA to the southeast of the mapped site boundary of AZ AA:1:66(ASM), including AZ AA:1:494(ASM), AZ AA:1:496(ASM), AZ AA:1:499(ASM), and AZ AA:1:500(ASM), may also be associated. Additionally, cursory observations by SRP for the current Project suggests that the site may extend further north than previously mapped. Site AZ AA:1:66(ASM) was recommended eligible for the NRHP (Hackbarth 1990).

AZ AA:1:126(ASM): This site, recorded in 2000, is the historic Stanfield Road, a north-south trending section line road that intersects Highway 84 in the town of Stanfield, Arizona. North of Stanfield, the road is a crowned and ditched dirt road that is 25 feet, 3 inches wide. The road becomes paved in Stanfield, remaining paved south of town. Stanfield Road is a locally important road that provides access to farmland north and south of the town of Stanfield, Arizona. It appears on the 1924 Casa Grande 15' USGS quadrangle map, but it does not exist on the 1914 GLO map of Township 6 South, Range 4 East. Therefore, the road is at least 76 years old, but it is no more than 86 years old. Stanfield Road is maintained on a regular basis. It was determined ineligible for the NRHP by SHPO in 2018, as it retains no historical integrity. Further, the road is an in-use historic-age structure.

AZ AA:1:171(ASM): This site, recorded in 2006, is a north-to-south oriented concrete-lined irrigation ditch located 0.5 mile north of Barnes Road and 0.5 mile south of Miller Road, and originally part of an individual farm dating to 1920. The ditch measures 4 m wide and averages approximately 1 m deep. The ditch is located between two north-south trending two track access roads and plowed fields to either side. Vegetation on site was sparse, but included Russian thistle and cotton. This irrigation ditch lies within MSIDD. Farms within the district were established as early as the mid 1910s; however, the district was created in 1962. Farmers within the district began lining earthen ditches with concrete in the 1980s to obtain CAP water. Addition of concrete to earlier ditches has removed the original fabric of the site. Site AZ AA:1:171 (ASM) was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007). It is recognized, however, that this in-use historic structure may have unevaluated significance as part of an irrigation district that remains unevaluated.

AZ AA:1:172(ASM): This site, recorded in 2006, is a north-to-south oriented concrete-lined irrigation ditch located 0.5 mile north of Barnes Road and 0.5 mile south of Miller Road, and

originally part of an individual farm dating to 1930. The ditch measures 2 m wide and averages approximately 75 cm deep. The ditch is located between two north-south trending two track access roads and plowed fields to either side. Vegetation on site was sparse, but included Russian thistle and other small bushes growing on a layer of sandy loam. This irrigation ditch lies within the MSIDD. Farms within the district were established as early as the mid 1910s. Prior to the district's formation individual farmers constructed and operated earthen irrigation ditches along each field; irrigation water was provided from individually owned wells dug into the aquifer. Farmers within the MSIDD district began lining earthen ditches with concrete in the 1980s to obtain CAP water. Addition of concrete to earlier ditches has removed the original fabric of the site. Site AZ AA:1:172 (ASM) was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007). It is recognized, however, that this in-use historic structure may have unevaluated significance as part of an irrigation district that remains unevaluated.

AZ AA:1:173(ASM): This site, recorded in 2006, is an earthen levee situated in an open, flat area located north of Barnes Road beside the Santa Cruz wash. The levee was constructed in the early 1960s to confine the Santa Cruz Wash to a single channel, protecting farms in the MSIDD and other irrigation districts. Russian thistle and various other bushes and grasses grow on sandy loam soils. Agricultural fields are located on both sides of the levee, with 2 two-track roads running parallel to the earthen construction. The north-south oriented levee measures 65 m wide at the top and 15 m wide at the base. It is 15 m deep and extends for an unknown length and therefore has an unknown site area. The berms on either side of the ditch measure 10 m in width, and the sloping sides of the construction each measure 15 m. No artifacts were found in association with the site. The site is near the center of the MSIDD, created in 1962. Farms within the district were established as early as the mid 1910s and Congress authorized funding for flood control in 1958; construction of the levee system was completed in the early 1960s. The levee system controlling the wash is currently in-use and levee maintenance is ongoing. Site AZ AA:1:173 (ASM) was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007).

AZ AA:1:497(ASM): This site, recorded in 2006, is a large preclassic Hohokam artifact scatter with a smaller, localized areas of dense artifacts (Figures 12 and 13). Overall, the site is estimated to have more than 1000 artifacts that consist almost exclusively of ceramics. The majority of artifacts are in an area approximately 86 × 58m (E-W × N-S) near the center of the site. The ceramic assemblage is dominated by Gila Plain, Gila and Salt variety sherds, however red-on-buff and buffwares are also present. A single plainware spindle whorl was also observed, along with one piece of Glycymeris shell, 12 flakes, four pieces of fire-cracked rock, and ten fragments of vesicular basalt metates and manos. While no cultural features were observed at the site, the variety of artifact types and numbers suggest cultural subsurface deposits may still exist. The site is in fair condition with disturbance from sheet wash erosion, livestock grazing, and a two-tracks. Because of the presence of several core concentrations of artifacts, a relatively diverse artifact assemblage, and the possibility for subsurface remains, SWCA recommended site AZ AA:1:497(ASM) as eligible for inclusion in the NRHP under criterion D (Bellavia et al. 2006). Site AA:1:497(ASM) overlaps the current boundary of AZ AA:1:66(ASM), and therefore, per ASM, will likely be consolidated under AZ AA:1:66(ASM) in the future.

AZ AA:1:502(ASM): This site, recorded in 2006, is an extremely large preclassic Hohokam habitation site with heavy to light artifact concentrations and scatters across the site. There are three loci (Loci A–C) containing very dense artifact concentrations surrounded by areas of moderate to light artifact scatters. The loci with high-density artifact concentrations, as well as some of the moderately dense scatters, are clearly the result of pot hunting and subsequent sheet wash erosion. The site is located on a flat alluvial plain with several small drainages. There are an estimated 15,000 artifacts within the site, most of which have been exposed by the pothunters. The surficial evidence of the site includes only artifacts, as no cultural features were observed. Ceramics observed at the site include Gila Plainware, both Gila and Salt variety, Santa Cruz/Sacaton Red-on-buff, one Casa Grande Red-on-buff jar sherd, buffware, and some Wingfield Plain sherds. Lithics observed include at least 115 ground stone fragments, most of which are small, and 125 flakes and flaked stone tools. Sixteen fragments of bracelets and unworked Glycymeris shell were identified. Additionally, burned bone was observed in the backdirt of a pothunter's hole. It could not be determined if the bone was human or faunal.

Pot hunting coupled with sheet wash erosion has severely disturbed site AZ AA:1:502(ASM). Only nine of the pothunter's holes were mapped but there are a number of others. Man made and natural disturbances have left the site in poor to fair condition. Based on the large number and types of artifacts exposed it is almost certain that subsurface cultural features exist. The site was likely a long-term Preclassic Hohokam habitation site that is located approximately 2300m west of Santa Rosa Wash and could contain pithouse features and human burials. The site is in poor to fair condition with disturbance from sheet wash erosion and human vandalism/pot hunting. Because of the presence of several core concentrations of artifacts, a diverse artifact assemblage, and the possibility for subsurface remains, SWCA recommended site AZ AA:1:502(ASM) as eligible for inclusion in the NRHP under criterion D (Bellavia et al. 2006). Site AZ AA:1:502(ASM) overlaps the current boundary of AZ AA:1:66(ASM), and therefore, per ASM, will likely be consolidated under AZ AA:1:66(ASM) in the future.

AZ AA:2:118(ASM): This site, first recorded in 1992, is Historic Highway 84 (also named "Gila Bend to Tucson Highway", "Border Sunshine Way", and "Casa Grande Highway"), originally constructed in 1936. The highway was in use until the early 1960s when the new Interstate 8 replaced it. Two discontinuous segments of Highway 84 were recorded in 1986, one of which is within one mile of the Project Area. No remaining historic segments have been discovered within or adjacent to the Project Area (Wright 1986). AZ AA:2:118(ASM) has been determined by SHPO to be eligible to the NRHP under Criterion D because it is part of the Historic State Highway System and for its significance as an important east-west transportation route in south-central Arizona prior to the construction of Interstates 8 and 10. However, many portions of the road are heavily modified and are not considered contributing elements to the site's significance. Nevertheless, abandoned portions of the old highway still exist that appear to retain many elements of historic integrity.

AZ Z:4:24(ASM): This site, recorded in 1986, low-density artifact scatter that covered an area of 45 by 100 m. Within this scatter were five artifact concentrations. Northland Research, Inc. undertook archaeological testing of portion of site AZ Z:4:24(ASM) to be impacted by construction of the MSIDD canal in October 1986 (Morgan 1986). Testing of these concentrations revealed shallow irregular deposits of cultural materials. No prehistoric features were identified.

The material here was restricted to the surface. Artifacts at the site included Santa Cruz Red-on-buff sherds, plain-wares, chipped stone debitage, ground stone tools, and one marine shell fragment. A total of 198 artifacts was recovered from the site, yielding an average of one artifact per 23 m². Based on diagnostic ceramics, the site appeared to date to the late Colonial Hohokam period. Further, the types and paucity of artifacts indicated that the site was used on a limited basis, possibly in conjunction with food processing activities. Northland Research recommended site AZ Z:4:24(ASM) as not eligible for the NRHP due to lack of subsurface remains (Hackbarth 1990).

Current Work

SRP's Class III surveys of the Project Area are not yet completed, and final reports are forthcoming. The survey by TYP SA of the Project Area north of Highway 84 has been completed and has recorded five new sites, one historic district, three linear features and 38 isolates included in their draft report (Dall, et al. 2026). South of Highway 84, the ongoing Class III survey conducted by Logan Simpson has identified at four new sites, six linear features and 123 isolated artifacts. This draft report is still being prepared, and the only available information to date is location and brief site descriptions.

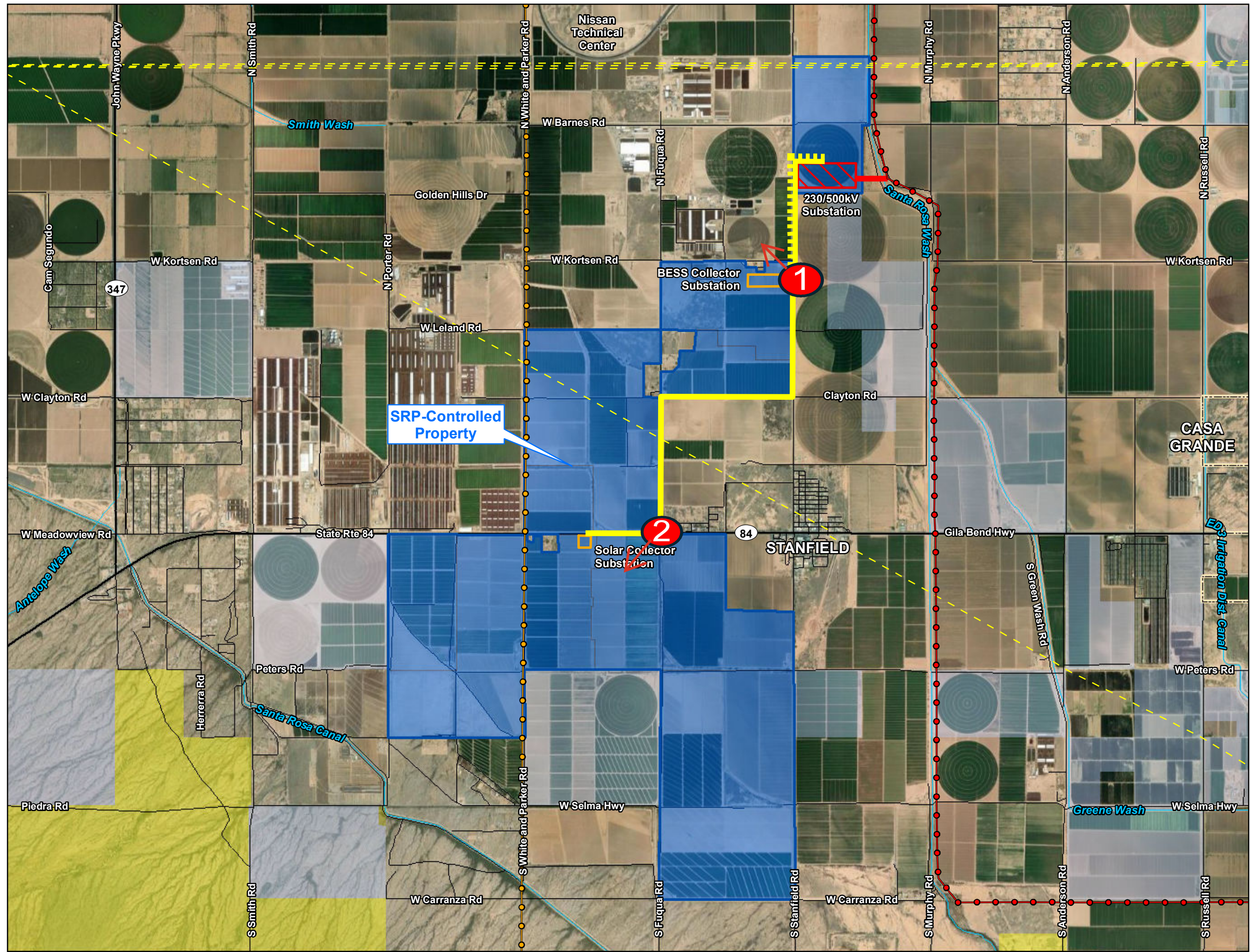
Tribal Outreach

Correspondence with the Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, and Yavapai-Apache Nation and the State Historic Preservation Office (SHPO) regarding cultural resources is included in **Exhibit E-2**. The cultural reports included in **Exhibit E-1** (Peters, 2021; Rogge, 2021) were also provided to the Tribes along with the correspondence.

Recommendations

The Class I Cultural Resources inventory identified 38 cultural resource sites within the one-mile buffer of the Project Area, nine of which intersect or are adjacent to the Project footprint. Of these, one site, AZ AA:2:118(ASM), has been determined eligible for listing on the NRHP. Additionally, one site, AZ AA:1:66(ASM) (Shelltown, which also includes AZ AA:1:497(ASM) and AZ AA:1:502(ASM)), has been recommended eligible for listing on the NRHP, while one has been determined not eligible and another four recommended not eligible. Approximately 1.5 percent of the proposed Project footprint had been previously surveyed. However, pedestrian surveys of the entirety of the Project Area are currently being conducted by archaeologists contracted with SRP for the Project. Pedestrian survey of the Project Area north of Highway 84 has been completed and has recorded five new sites, one historic district, three linear features and 38 isolates, all of which have been recommended not eligible for listing on the NRHP (Dall, et al. 2026). South of Highway 84, the Class III survey has identified at four new sites, six linear features and 123 isolated artifacts. These resources have not yet been evaluated for listing on the NRHP. While it is unlikely that unanticipated discoveries of archaeological, paleontological, or historical sites, human remains, funerary objects, sacred ceremonial objects or objects of national or tribal patrimony would occur during construction or operation of Project facilities, it is nonetheless possible. Unanticipated discoveries of such materials on state, county, or municipal lands are subject to A.R.S. § 41-844. For unanticipated discoveries of human remains or funerary objects on private lands, A.R.S. § 41-865 would prevail. If unanticipated discoveries are made in connection with construction activities,

the Project would suspend all operations in the vicinity of the find and would not resume until the discovery is appropriately treated and authorization is given by the appropriate agency.



Legend

CEC Jurisdictional Project Components

Transmission Line 1 – Double Circuit 230 kV

Transmission Line 2 – Double Circuit 230 kV

Non-Jurisdictional Project Components

Proposed 500kV Connection

Collector Substation Location

230/500 kV Substation Location

SRP-Controlled Property

General Features

500 kV Transmission Line

230 kV Transmission Line

Natural Gas Pipeline

State Highway

Road

Major Stream / Wash / Canal

Municipal Boundary

Jurisdiction

Bureau of Land Management Land

State Land

Key Observation Point (KOP) Location & Direction

00.250.50.751

Miles

ARIZONA

Phoenix

Florence

Pinal County

Map Extent

SRP PROJECT MARIGOLD

FIGURE E-1

KOP LOCATIONS

Map Extent: Pinal County, AZ

Date: 8.10.26

Author: SJW

SPCS NAD 83, AZ Central, Foot.

Data Sources: ADOT, BLM, ESRI, Pinal Co., SRP.

D:\Projects\SRP Marigold\Maps\Figure 1 Project Components 070926

Figure E-2 - KOP 1 North Stanfield Rd looking Northwest

Current Condition



Simulated Condition



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

Figure E-3 - KOP 2 North Fugua Rd & State Route 84 - looking Southwest



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

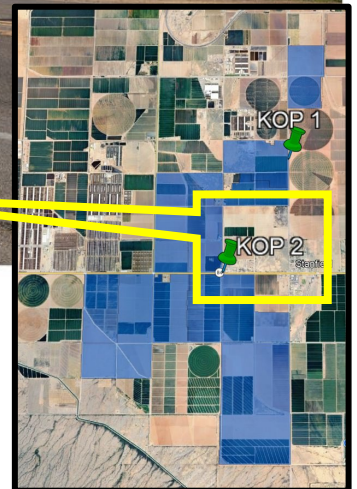


EXHIBIT E-1
CLASS I CULTURAL REPORT

MARIGOLD ENERGY CENTER PROJECT

CLASS I CULTURAL RESOURCES INVENTORY REPORT PINAL COUNTY ARIZONA

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Figure 2. Project Overview (Appendix A)
Figure 3. Project Location (Appendix A)

Marigold Energy Center – Class I Cultural Resources Report

Figure 4. Records Search Result: Previous Studies (Appendix A)

Figure 5. Records Search Results: Sites (Appendix B (Confidential))

ACRONYMS

A.D.	Anno Domini
APE	Area of Potential Effects
ARO	Archaeological Records Office
ASLD	Arizona State Land Department
ASM	Arizona State Museum
AZSITE	Arizona’s Online Cultural Resource Inventory
B.C.	Before Christ
BESS	Battery Energy Storage System
BLM	Bureau of Land Management
GLO	General Land Office
LARC	Library and Archives
kV	Kilovolt
MARR	Magma Arizona Railroad
MSIDD	Maricopa-Stanfield Irrigation and Drainage District
SPRR	Southern Pacific Railroad
SR	State Route
MW	Megawatt
NETR	Nationwide Environmental Title Research
NRHP	National Register of Historic Places
PV	Photovoltaic
PLSS	Public Land Survey System
SHPO	State Historic Preservation Office
SR	State Route
T-line	Transmission line
USGS	U.S. Geological Survey

1.0 INTRODUCTION

The following Class I cultural resources report was prepared on behalf of SRP, in support of the proposed Marigold Energy Center Project (Project) (**Figures 1 and 2 (Appendix A)**). This Project consists of a proposed mixed natural gas and solar generation and storage facility consisting of a new 230/500 kV substation, transmission lines, three areas of solar photovoltaic (PV) generation, a new gas plant, and battery energy storage system (BESS) near Stanfield, on both the north and south sides of State Route (SR) 84, in Pinal County, Arizona (**Figure 3 (Appendix A)**). More specifically, the Project area is located on the Antelope Peak NE, Stanfield, Indian Butte, and Double Peak U.S. Geological Survey (USGS) 7.5-minute quadrangles within Township 6 South, Range 4 East, Sections 5, 8, 18, 30 and 31; Township 6 South, Range 3 East, Sections 13, 24 to 27, and 34 to 36; and Township 7 South, Range 4 East, Sections 5 and 6 (Gila and Salt River Base Line and Meridian) of the Public Land Survey System (PLSS).

The Project Area of Potential Effect (APE) consists of the substation, energy generation and storage facilities, and transmission lines, and covers a total of approximately 5,007 acres, with an additional 1764 acres of potential expansion areas.

Nine cultural resources have been previously identified within or immediately adjacent to the APE. Of these, one site, AZ AA:2:118(ASM), has been determined eligible for listing on the NRHP. Additionally, one site, AZ AA:1:66(ASM) (Shelltown, which also includes AZ AA:1:497(ASM) and AZ AA:1:502(ASM)), has been recommended eligible for listing on the NRHP.

Thirteen prior cultural resources surveys have been conducted within the APE, constituting 1.5% of the project area. An additional nine cultural resource surveys have been conducted within the 1-mile buffer, but outside of the APE.

Pedestrian surveys of the entirety of the APE are currently being conducted by archaeologists contracted with SRP for the Marigold Energy Center Project, the results of which are forthcoming. So far, six new archaeological sites, three historic in-use linear features, and 38 isolated artifacts have been identified as a result of these surveys.

Project Description

SRP is developing the Marigold Energy Center. The Project is sited on approximately 5,007 acres of SRP owned property in Pinal County, east of the junction of US Interstate 8 and State Route (SR) 84, and spanning both the north and south sides of SR 84. The Energy Center includes the development of up to 4665 acres of solar photovoltaic (PV) panels, providing up to 600 MW of solar energy, a gas turbine plant, providing up to 675 MW of natural gas energy, a 500 kV main substation and collector substations, and a battery energy storage system (BESS) up to 400 MW, connected by a 230 kV transmission line. The Project APE includes two additional areas that are not a part of the project today but have future expansion potential.

2.0 METHODS

The previously recorded cultural resources and investigations in the APE, plus a 1-mile-wide buffer, were examined using existing data to determine if known cultural resources would be potentially impacted by the Project. The Arizona State Museum (ASM) Archaeological Records Office search was conducted in December 2025. In addition to the ASM records search, sources consulted include the National Register of Historic Places (NRHP) database, the AZSITE database, the ASM Library and Archives (LARC) online catalog, records of the Arizona State Historic Preservation Office (SHPO), the Arizona Historic Bridge Inventory, and Bureau of Reclamation provided by SRP. The record search area covered approximately 35 square miles, or approximately 22,403 acres, of which 3.6 square miles, or 2,325 acres (10.4 percent) are covered by surveys conducted within the past 43 years.

Additional research was focused on the identification of historic-era resources within the Project vicinity. PanGIS consulted historical maps and documents of the records search area, plus a 1-mile buffer around the APE, including historic maps (BLM GLO 1914, 1917; USGS Ajo 1953, 1957, 1958, 1962, 1963, 1967, 1969; USGS Antelope Peak 1946, 1948, 1963; USGS Antelope Peak NE 1981; USGS Casa Grande 1922, 1924, 1994; USGS Double Peak 1965, 1992; USGS Indian Butte 1981; USGS Stanfield 1965, 1982, 1992; USGS Tucson 1956, 1958, 1959, 1962), and aerial photos (Maricopa 1953; NETR 1957, 1961, 1963, 1976, 1978, 1983, 1996, 2003). Upon searching for the BLM GLO survey plats within the area of the 1-mile buffer, four maps are listed: two from 1914, for Township 6 South, Range 3 East; Township 6 South Range 4 East; and two from 1917, for Township 7 South, Range 3 East and Township 7 South, Range 4 East (BLM 2026).

The prehistoric and protohistoric Cultural Setting draws heavily from *Priority Prehistoric Cultural Resources, Pinal County, Arizona* (Laurenzi 2012), developed by Archaeology Southwest for the Pinal County Planning and Development Department in service of the County's addition of a Cultural Resources element to its Comprehensive Land Use Plan. The cultural context included in Laurenzi 2012 is primarily excerpted from Lindeman et al. 2009 and Marshall and Craig 2010.

To develop the historic period context of the Project area, secondary sources were consulted comprising popular histories including Vladimir Guererro's *The Anza Trail and the Settling of California*, Hampton Sides' *Blood and Thunder: The Epic Story of Kit Carson and the Conquest of the American West*, Richard Orsi's *Sunset Limited: The Southern Pacific Railroad and the Development of the American West, 1850-1930*, David Myrick's *Railroads of Arizona* series, and government records including National Register documentation. Statewide historic contexts consulted included *Good Roads Everywhere: A History of Road Building in Arizona* (Keane and Bruder 2004), *Transcontinental Railroad in Arizona, 1878-1940* (Janus 1989), and *Lifeline to the Desert: Water Utilization and Technology in Arizona's Historic Era, 1540-1960* (Steely and Gilpin 2004).

3.0 CULTURAL SETTING

The APE falls on the southwestern edge of what is commonly referred to as the Phoenix Basin, in the Santa Cruz River Valley, near the Santa Rosa Wash. This area has a human occupation that is generally accepted to span at least the last 12,000 years. The record of human habitation is generally broken down into recognizable prehistoric and historic periods. The following discussion of these periods is meant to be general and does not include all periods of human occupation. More detailed summaries of the history and prehistory of the area can be found in Bayman (2001); Berry and Marmaduke (1982); Cordell (1984); Fish (1989); Fish and Fish (2008); Gilpin and Phillips (1998); Gumerman (1991); Haynes (1986); Myrick (1980); Reid and Whittlesey (1997); Sheridan (1992, 1995); Spicer (1962); and SWCA (2003).

Paleoindian Period (before 6,500 B.C.)

Human populations migrated into Southern Arizona before the end of the Pleistocene era, around 12,800 years ago. The environment during this period would have been wetter and cooler than today, with a prevalence of woodlands, marshlands and grasslands (Ballenger et al. 2011, Reid and Whittlesey 1997). Archaeological evidence suggests that these first American populations, who archaeologists refer to as Paleoindians, lived in small, highly mobile groups that moved seasonally depending on food availability. These populations would have subsisted mostly on small game animals and wild plants; however, evidence of large, fluted projectile points, referred to as Clovis points, suggests that large animals, including mammoths, were also hunted (Reid and Whittlesey 1997). A small number of sites with evidence of Clovis points have been found in Southern and Central Arizona, including the Phoenix Basin, and provide the earliest dates for human occupation of the area (Haynes 2011).

Archaic Period (6,500 – 1,500 B.C.)

The transition to the Archaic period is closely linked to the Pleistocene/Holocene climatic evolution that brought about warmer and drier conditions in southern Arizona, along with the extinction or exodus of larger game species, beginning at around 9,000 B.C. The Archaic period is often divided into early, middle, and late components, based primarily on differences in projectile point styles (Huckell 1996, McBrinn 2010). The climate during the Early Archaic period (8,500-5,500 BP) was a warmer, wetter climate than previously. During the Middle Archaic period (5,500-3,500 BP), the climate became dryer and warmer, similar to conditions today.

The subsistence strategy of the human inhabitants during this period would have looked similar to the Paleoindian period, but with a growing reliance on small game and intensified collection of plant resources (Reid and Whittlesey 1997). This period is also marked by the first evidence of intensive use of milling stones (i.e., metates, manos, and mortars), demonstrating a significant focus on processing wild plant resources (Huckell 1996, McBrinn 2010). Gathering and collecting focused on seasonally available resources, and small seasonally occupied camps and settlements were present, with small groups maintaining a high degree of residential mobility.

Late Archaic/Early Agricultural Period (1,500 B.C. – A.D. 500)

The third phase of the Late Archaic period is also referred to as the Early Agricultural period because it is during this time that domesticated crops are introduced to the area from Central Mexico, where they were originally domesticated. Evidence for the growing and storage of corn has been found at sites all over Arizona as early as 3,500-4,000 BP. However, domesticated crops were not the major part of the

Archaic diet, and people living in southern Arizona at that time continued to subsist primarily on wild plants and animals (Huckell 1996).

The sowing, harvesting and storing of corn did lead to a reduction in residential mobility during this period. There is widespread evidence of more permanent seasonal residences that were round in shape, constructed of brush and pole walls in shallow basins, and contained earthen storage pits. Discoveries of large, circular “big houses” that may have served as centers of ritual and community life (Reid and Whittlesey 1997). There is also evidence in southern Arizona for irrigation canals and wells, suggesting that some villages were occupied year-round, especially toward the end of the Archaic period (McBrinn 2010). Stylistically distinctive Cortaro, Tallerin, Empire, San Pedro, and Cienega type projectile points are common at sites, as are a range of ground stone and flaked stone tools, ornaments, and shell jewelry. The fact that shell and some of the material used for stone tools and ornaments were not locally available suggests trade networks were operating. Although ceramic figurines and miniature pots were made in southern Arizona during the Early Agricultural period, pottery vessels large enough to be used for practical purposes did not become common until after A.D. 150 (Mabry 1998). The widespread appearance of pottery in southern Arizona is associated with the Hohokam cultural tradition.

Hohokam Period (A.D. 450 – 1450)

The most substantive prehistoric archaeological remains in Pinal County are those defined by archaeologists as Hohokam (an O’odham word roughly meaning “those who have gone”). The portions of Pinal County that include the middle Gila River and the upper Santa Cruz River constitute part of the core area of the Hohokam tradition (Reid and Whittlesey 1997).

Between A.D. 150 and 1450, the Hohokam built a vast network of canals that irrigated thousands of acres of land in southern Arizona (Howard 1993). Non-irrigation farming techniques were also practiced away from major waterways (Masse 1991). Corn, beans, squash, and cotton were the primary crops grown by the Hohokam, and a variety of native plants and animals were harvested from the surrounding countryside (Reid and Whittlesey 1997). In addition to building canals and growing crops, the Hohokam were skilled artisans who specialized in the production of craft items such as pottery, stone tools, and shell jewelry. Craft items were commonly traded from one village to the next, often ending up many miles away from where they were produced (Abbott 2000).

The Hohokam cultural sequence is divided into four general periods: Pioneer (A.D. 450-750), Colonial (A.D. 750-950), Sedentary (A.D. 950-1150), and Classic (A.D. 1150-1450). The Pioneer period is distinguished by the introduction of red ware and, somewhat later, red-on-buff pottery, and the establishment of the first large, nucleated villages with plazas along the Gila and Salt rivers (Gregory and Huckleberry 1994). Semi-subterranean houses (pit houses) were made out of wooden poles, brush, and mud during the Pioneer period. Interestingly, some of the largest pit houses ever built by the Hohokam were made during the Pioneer period, but are unique to the Phoenix basin (Hauray 1976). These large structures probably served as council houses or community meeting houses. Most pit houses were much smaller and probably served as dwellings for nuclear families.

This was followed by a rapid expansion of irrigation systems and habitation centers across the river basins during the Colonial period, ca. A.D. 750-950 (Doyel 1991). Increasing social complexity also characterized the Colonial period. Pithouses were clustered into discrete courtyards, which, in turn, were organized into larger village segments, each with their own roasting area and cemetery (Henderson 1987; Wilcox et al. 1981). Around A.D. 800, ballcourts were built at a number of the largest villages (Wilcox and Sternberg 1983). The presence of the ballcourt is thought to represent the emergence of a regional system with

religious, economic, and political functions, tied together by the exchange of plain and buff ware ceramics, marine shell, foodstuffs, and other items (Abbott 2001; Wilcox 1991; Wilcox and Sternberg 1983).

The Sedentary period, ca. A.D. 950 to 1150, was a time of both continuity and change in Hohokam society. Many settlements that had been in existence for hundreds of years continued to flourish until the last half of the eleventh century. Then, for reasons that are still unclear, there was a major upheaval in Hohokam society and many villages were abandoned (Wilcox 1999). Distinctive artifacts associated with the Sedentary period include several kinds of pottery vessels with sharp shoulders and flat bases, and a type of decorated pottery with banded design motifs rather than free-flowing elements. Many of the canal systems were reconfigured during this time (Howard 1993), with some consolidation of separate systems (Woodson 2010). This coincided with a more developed settlement hierarchy in the river basins, with each canal system having at least one large village in addition to smaller ones (Gregory and Nials 1985). By the late Sedentary, house clusters were arranged in more formalized rectangular patterns that forecast the development of the supra-household compounds seen in the Classic period (Wilcox et al. 1981).

The Classic period, ca. A.D. 1150 to 1450, is marked by dramatic changes in Hohokam material culture, architecture, and traditions. Surface adobe-compound architecture appeared for the first time, supplementing, but not replacing, the tradition of semisubterranean pithouse architecture. Burial modes also changed, with an increasing dominance of inhumation over cremation burial. Buff ware pottery diminished in frequency during the period, being replaced by red ware pottery and, later, polychrome types. Ballcourts were largely abandoned during the late eleventh century (Wallace et al. 1995), and around the late thirteenth century large earthen features called platform mounds replaced ballcourts as the principal form of public architecture (Gregory 1987). Most notable during this period is the overall aggregation of Hohokam villages into fewer, but larger, irrigation communities spaced at regular intervals along the canal systems prevalent in the Gila and lower San Pedro river valleys. Because construction of these features required considerable levels of organized labor, many think the mounds and canal systems are symbols of a socially differentiated society (Doelle et al. 1995; Fish and Fish 2008; Gregory 1987).

Beginning in the early fourteenth century, population declined steadily in most areas, and by the mid-to-late fifteenth century, evidence of Hohokam material culture disappeared from the archaeological record (Hill et al. 2004). The reasons for this apparent demographic and social collapse remain a mystery. Skeletal studies of human burials indicate that many of the residents of platform mound settlements were extremely unhealthy, suggesting that long-term environmental degradation may have resulted in declining crop yields and demographic decline (Abbott 2003; Hill et al. 2004).

Protohistoric Period (A.D. 1450 – 1750)

Archaeologists know little about the period between the disappearance of Hohokam material cultural remains from the archaeological record, and the observations of Spanish explorers and missionaries in the late sixteenth and seventeenth centuries. To date, few archaeological sites dating to the period between the Hohokam epoch and the arrival of the Spanish in southern Arizona have been found or investigated. However, archaeology provides only one source of information about the past. Several Native American groups consider themselves to be among the descendants of the Hohokam, including the O'odham, and several clans of the Hopi and Zuni tribes. Many traditional histories also maintain that while the political structure of Hohokam society may have dissolved, the people themselves persisted and thrived throughout the Protohistoric period and continue to occupy the region today (e.g., Bahr et al. 1994).

O’odham people (whose tribal lands presently include the Tohono O’odham Nation, Gila River Indian Community, Ak-Chin Indian Community, and Salt River Pima-Maricopa Indian Community), were first noted in written Spanish accounts by Padre Eusebio Kino in 1687 (Sheridan 2008). O’odham people were well established in southern Arizona with villages on the San Pedro, Santa Cruz, and Gila Rivers when Padre Kino and other Spanish explorers arrived in the late seventeenth century (Spicer 1962). These early Spanish accounts suggest O’odham settlements were loosely organized collections of round, brush-covered houses, most often located in riverine settings. Each small village seems to have been politically autonomous, self-sufficient, and focused on irrigation and floodwater agriculture (Bolton 1936). Together with the ethnohistoric and ethnographic data, the limited archaeological findings from this period support a continuous relationship to the Hohokam.

Historic Period

The Historic period in Arizona dates roughly from 1753, the founding of the first permanent Spanish settlement, to 1954. In 1775 Juan Bautista de Anza successfully opened an overland route of emigration and supply from Sonora to the missions and settlements of Alta California. The soldiers and families that Anza escorted brought with them on their 1,200-mile trek their language, traditions, and diverse New World Hispanic culture. Almost all the expedition members were born on this continent and had mixed European, African or Indian parentage. These influences changed the lives of the indigenous peoples and shaped the development of Arizona and California. The route opened by Anza supplied the settlements of Alta California long enough for them to become established. In 1781, the Yumas revolted against Spanish rule and closed the route during the rest of the colonial period. In later years, Anza's trail served the military, settlers, cattlemen, forty-niners and other desert travelers (Guerrero 2006).

The Mexican War of Independence did not have a direct effect on the area, as most of the battles took place far south of Arizona in central Mexico. However, the Spanish did have to withdraw their troops to central Mexico, which left a vacuum that the Apache exploited. During the 1820s, Apache raiders were estimated to have killed approximately 5,000 people in Sonora and southern Arizona. Mexico was victorious in the war and declared independence in 1821. The new Mexican government abolished the mission system. In Arizona, settlements and occupation contracted to Tucson and Tubac. In response to increased Apache raiding, O’odham settlement also contracted south and west (Sides 2006).

Arizona north of the Gila River became part of the United States in 1848, as a consequence of the Mexican-American War (1846-1848). At that time it was officially part of New Mexico. The area south of the Gila River was sold to the United States by Mexico in 1853 as part of the Gadsden Purchase, in order to build the transcontinental railroad (Sheridan 1995).

During the Mexican-American War, American military forces passed through southern Arizona on their way to California, commonly using routes centered on the Santa Cruz and Gila rivers. The US Army constructed roads along these routes, including Cooke’s Wagon Road, built by the Mormon Battalion in 1846-1847. These routes were increasingly used after the end of the war, and further expanded with the establishment of mail routes and with the charter of private companies to construct toll roads. Most other wagon roads were funded locally or privately (Keane and Bruder 2004).

During the 1850s and 1860s, the first organized semi-public transportation in Arizona included the San Antonio and San Diego Mail Line and then the Butterfield Overland Mail Line. Communities along the Gila River, such as Maricopa, Sacaton and Florence, were established along the former Butterfield stage route.

After the Civil War and establishment of the Arizona Territory in 1863, Americans began to settle permanently along the Salt, Santa Cruz and Gila Rivers because of the availability of good agricultural lands. Communities along the Salt River, including Phoenix and Tempe, were founded in the 1860s as small agricultural communities, especially after the establishment of Fort McDowell and Camp Grant made the upriver areas safer for American settlers. From 1880 to 1900, the population of southern Arizona doubled, and by the turn of the 20th century, Arizona had a population of 100,000 (Keane and Bruder 2004).

After the successful completion of the first transcontinental railroad in 1869, a southern railroad route was being explored as an option to move goods and people across the country in a timely fashion. The Southern Pacific Railroad (SPRR) arrived in Maricopa Station on April 29, 1879. By the end of 1881 the SPRR track through Arizona connected to the nationwide system of rail lines, spurring the economy and settlement of southern Arizona. Towns sprung up along the railroad, including Casa Grande in 1879, Arizola in 1891, and Eloy in 1920. Through the turn of the 20th century, SPRR land development policies, and the need to provide consistent water supply for steam locomotives, led to the development of townsites and water stops, many of which later grew into larger communities (Orsi 2005).

The discovery of the Silver King Mine in 1875 also had a significant impact on Pinal County's development, attracting miners and boosting the local economy. Florence became a boomtown. Pinal County was formed from portions of Maricopa and Pima counties on Feb. 1, 1875, in response to the petition of residents of the upper Gila River Valley, as "Act #1" of the Eighth Territorial Legislature. Florence was established in 1866 and designated as the county seat of Pinal County.

Early agricultural development in the region spread west from Phoenix and increased with the dams and canals of the Salt River Project, one of the first five reclamation projects authorized by the National Reclamation Act of 1902. With a reliable water supply, agriculture in the region expanded rapidly through the 1910s, especially cotton early on and citrus in the 1930s. It also allowed the explosive growth of Phoenix and surrounding communities (MacDonald and Bailey 2017).

The town of Stanfield, directly east of the project area, was originally called Summerland and was located at White and Parker and Barnes Road, and about 10 miles southeast of Maricopa near the Santa Rosa Wash. The first settlers in the area were two families: the Eastman family and the Emiliano Robles family, who owned a couple of cattle ranches. Colonization of Summerland began with about 40 families who migrated from the California area, including the F.H. Swensen family and the N. W. Stanfield family. Many families took advantage of land claims authorized under the Desert Land Act of 1877 and homesteaded in the Casa Grande Valley. The first school was made of adobe with tall windows that doubled for Sunday school classes and church services, opened in September 1913. Nixon Stanfield became Summerland's first postmaster on May 6, 1914, when the post office was dedicated. The post office survived until June of 1918 when it closed. It reopened for business in September of 1948 with a new name, Stanfield Post Office, to honor its first postmaster. Sometime in the late 1920s-1930s, farmers left the area for various reasons. The Summerland School was bulldozed to make room for the Arizona Test Center for Automobiles, with a test track just north of the project area (InMaricopa.com 2026).

In 1922 an Irish immigrant, W.T. McClelland, began Shamrock Dairy, which still runs today, with cattle ranches located north and west of the project area (Shamrock Farms 2026). The actor John Wayne purchased a feedlot in Stanfield, Arizona in the 1950s He named the enterprise the Red River Feedlot. In 1962, he became a partner in the Red River Land and Cattle Company, which is still operational today just west of the project area (Casa Grande Main Street 2026).

Running through the project area is historic SR 84, which is currently the westbound frontage road for Interstate 10 (I-10) north of Tucson, was among the 17 original routes designated in 1927 when the Arizona state highway system was first numbered (Hamilton 2005). State Route 84 connected Tucson and Gila Bend, and was variously known as the Gila Bend-to-Tucson Highway, Border Sunshine Way, or Casa Grande Highway. The highway was first paved in 1930 and 1931, and it was improved and sections were realigned in 1950 and 1951. When I-10 and Interstate 8 were constructed, they replaced much of State Route 84. A segment that was bypassed by I-10 between Eloy and Casa Grande was decommissioned in 1998, and only the segment in the Casa Grande–Stanfield area still retains the State Route 84 designation (Erickson 2009).

Ethnographic Background

The Project area, based on ethnohistorical reconstructions, falls within the aboriginal territory of the Akimel O’odham (River People), also known as Pima, and the Tohono O’odham (Desert People), previously known as Papago — two distinct but interconnected and linguistically-related Native American tribes. The Project area is situated between three federally-recognized tribes: 5 miles (8 km) south is the Tohono O’odham Nation Reservation, made up of Tohono O’odham peoples; 5.6 miles (9 km) north is the Gila River Indian Reservation, made up of Akimel O’odham and Maricopa peoples; and 6.9 miles (11 km) northwest is the Ak-Chin Indian Community, made up of Akimel O’odham and Tohono O’odham peoples. The following histories for each reservation are adapted from their websites (Ak-Chin 2026; Gila River 2025; Tohono O’odham 2026).

Tohono O’odham

“Our origins are linked to our homeland, the Sonoran Desert. Thousands of years ago, our predecessors, the Hohokam, settled along the Salt, Gila, and Santa Cruz Rivers. The Hohokam were master dwellers of the desert, creating sophisticated canal systems to irrigate their crops of cotton, tobacco, corn, beans, and squash. They built vast ball courts and huge ceremonial mounds and left behind fine red-on-buff pottery and exquisite jewelry of stone, shell, and clay.

Following our ancestral heritage, we became scientists of our environment. We used and continue to use meteorological principles to establish planting, harvesting, ceremonial cycles and we developed complex water storage and delivery systems. We learned to make the best of our environment, migrating with the seasons from our homes in the valleys to our cooler mountain dwellings. On our Oidag in the valleys, near the washes that crisscrossed our land, we raised a tapestry of crops, including tepary beans, squash, melon, and sugar cane. We gathered wild plants such as saguaro fruit, cholla buds, and mesquite bean pods, and we hunted for only the meat that we needed from the plentiful wildlife, including deer, rabbit, and javelina.

Our communities, districts and Nation have a long and proud history. We continue to live this proud heritage today as 21st century Tohono O’odham. In 1535 New Spain, including Mexico and much of the modern-day Southwest of the United States, is established. In 1687 Father Eusebio Kino, a Jesuit missionary, arrives in Sonora. From then until his death in 1711 he builds missions and works with the Tohono O’odham and Pima, introducing Christianity, wheat, livestock, fruit, and metal tools. In 1700, he establishes the San Xavier mission. In 1783 construction begins on the San Xavier mission. In 1854 the Gadsden Purchase leads to the current U.S.-Mexico border traversing O’odham lands. The San Xavier reservation is established in 1874, and the Gila Bend reservation is established in 1882. In 1917 the main

Tohono O’odham reservation is established and in 1937 The Tohono O’odham, then called the Papagos, adopt their first Constitution.

In 1970 the Tohono O’odham Utility Authority (then called the Papago Tribal Utility Authority) is created. In 1978 Florence Village is established as part of the Nation. The Tohono O’odham adopt a new Constitution in 1986, establishing a three-branch form of government. In 1993 the Tohono O’odham Nation signs its first Indian gaming compact with the state of Arizona, and a new Desert Diamond Casino opens at 1-19 and Pima Mine Road in 2002. In 2003 land for the Hia-Ced O’odham is purchased near Why, Arizona. In 2007 the Tohono O’odham Cultural Center and Museum opens, and the old Desert Diamond Casino is replaced by a new facility including a hotel. The Tohono O’odham Gaming Enterprise now operates three casinos.”

Gila River

“Circa 300 B.C., early inhabitants of the Phoenix basin were joined by peoples from central Mexico, transformed by concepts and technology introduced from the south. From this merger arose the Huhugam (Hohokam) people, the ancestors of the O’odham, who conducted trade over great distances and became superb farmers. Around A.D.1450, for unknown reasons, the urban centers were abandoned, and the Huhugam culture dispersed.

Before the arrival of the Spanish, the O’odham lived in village clusters dotting the entire Gila River Valley, to the East as far as Florence, to the West near the base of the Estrellas or Komatke as they are called by the O’odham. They had a well-defined irrigation system in place. The O’odham had crops of corn, beans and squash, as well as cotton and tobacco, grown in abundance.

The Spanish missionaries converted many of the O’odham people, whom they called Pima, to the Roman Catholic faith, and introduced new crops, cattle, horses, sheep and goats, and new technologies – which they were quick to adapt to their own uses. But they were largely ignored, and life largely went on little changed, during the Spanish era and in the period following Mexico’s break from Spain 1821. The situation, however, took a radical turn in the next historical phase.

In 1846, southern Arizona fell under the influence of the United States following the Mexican-American War. In 1848, gold was discovered in California and tens of thousands of ill-prepared men streamed across America heading toward dreams of riches. One of the primary routes was across southern Arizona. Between 1849 and 1851, an estimated 60,000 travelers arrived among the peaceful O’odham, many starving or near death from dehydration and/or wounds inflicted in battle by the warring Apache to the east and the Yuman tribes to the west of our lands. Here the travelers rested and ate well, enjoying the O’odham bounty of wheat, corn, beans, pumpkins, watermelon, squash, peas and other foods. Indeed, one grateful member of the Mormon Battalion wrote in his journal in 1846, en-route from New Mexico to California to secure that state during the Mexican American War, “They are a noble race.” And wrote Lt. Sylvester Mowry in 1857, “Their stores of wheat and corn have supplied many a starved emigrant, and restored his broken down animals.”

The O’odham were also hospitable to other tribes as well. In the 1840s (though some sources suggest this occurred as early as the mid 1700s), the Akimel O’odham offered refuge to the Maricopa tribe, a Yuman tribal people who had been driven eastward from the lower Colorado River area by other Yuman tribes. The Maricopa, who called themselves the “Pee Posh,” settled in with the Akimel O’odham, and to this day they share the space and resources of the Gila River lands. In 1854, the Gadsden Purchase officially made southern Arizona part of a United States Territory. In appreciation for the important role the Akimel

O’odham played in America’s westward expansion, in 1859 Congress established the first reservation in Arizona, encompassing 372,000 acres along the Gila River. In 1862, putting their agricultural skills to work, the O’odham grew more than one million pounds of wheat, most of which they sold.

However, the lifeblood of the O’odham - Gila River water - was cut off in the 1870s and 1880s by construction of upstream diversion structures and dams by non-Native farmers, and their farming was largely wiped out. From 1880 to 1920 or so, they faced mass famine and starvation. The federal government stepped in and doled out canned and processed food by the ton. The change in diet proved disastrous, leading to extremely high rates of obesity and diabetes-a condition they still face today. With almost no jobs available on the reservation, and the loss of their cash crops, the O’odham faced widespread poverty as well. Alcoholism raised its ugly head, and the people experienced the loss of certain cultural and artistic traditions and rituals.

But they proved resilient and eked out a marginal existence for several precarious decades. Conditions finally began to improve in the 1930s, when the U.S. government completed Coolidge Dam on the upper Gila River, creating the San Carlos Reservoir. The project included a canal and pipe system to deliver some of this lake water to the Gila River Indian Reservation, restoring a portion of their farming practices. This was the beginning of a long climb out of the economic trenches. Men began to find work off the reservation following World War I and World War II as the introduction of cars made travel to booming Phoenix possible. Eventually, small businesses began to appear on the reservation as well, launched both by the community and individual tribal members. Schools, health centers and new housing appeared. Income levels slowly grew and famine was erased. These trends continue today as the Gila River Indian Community looks toward a promising future.

Today the people who now reside within the reservation of the Gila River Indian Community the Pima and Maricopa are in the planning stages of an irrigation project of monumental proportions. The plans are to establish an irrigation system to deliver water to 146,300 acres, from District 1 in the Blackwater area to the farms of the Pee-Posh in District Seven.”

Ak-Chin

“The Ak-Chin Indian Community was established by the U.S. Government in 1912 when President Taft signed for a reservation of 47,600 acres, which was reduced to less than 22,000 the following year. The tribe’s government was formed in 1961 under the Indian Reorganization Act of 1934. In a 1984 federal settlement, they gained water rights to the Colorado River, enabling them to continue using irrigation to support agriculture and other needs.

Their first major enterprise was Ak-Chin Farms, established in 1963. Now with 15,000 productive acres, they are among the largest farming communities in the U.S. Cotton is the principal crop while barley, potatoes, alfalfa and corn are also grown. They entered the gaming industry in 1994 with Promus/ Harrah’s management for a 72,000 square-foot casino. Additionally, The Ak-Chin Him Dak Eco-Museum is a first-of-its-kind living museum that includes and preserves their culture, land and heritage. Him-Dak means “way of life.”

The Native American language for Ak-Chin Indian Community is O’odham. As of April 2019, the Ak-Chin Indian Community is the first to have state-certified O’odham language teachers.

The Ak-Chin Indian Community is composed mainly of Akimel O’odham and Tohono O’odham as well as some Hia-Ced O’odham members. Ak-Chin is O’odham for “mouth of the wash”—the place where it

recedes into the ground. It refers to a type of farming that relies on washes created by winter snows and summer rains. They currently have just over 1,100 tribal members.”

4.0 PREVIOUS RESEARCH

Records Search

The records search of the APE combined with a 1-mile buffer was examined to identify any potential for impacts to cultural resources associated with the proposed Project. The ASM records search, which included the mapped locations of prior projects, revealed that 22 investigations have been conducted within one mile of the Project. Thirteen of these investigations were pedestrian surveys that intersect the Project APE, and covered 102 acres of the APE (approximately 1.5%). (**Table 1** and **Figure 4 (Appendix A)**). Conversations with SRP indicate that pedestrian surveys of the entirety of the APE are currently being conducted by archaeologists contracted with SRP for the Marigold Energy Center Project, one of which is included in Table 1.

Table 1. Previous Investigations in APE

Report ID	Year	Author	Project	Company
1984-219.ASM	1984	Marmaduke, William S.	CAP-DD SANTA ROSA CANAL PHASE A, TASK 6 AND 21.	Northland Research, Inc. Flagstaff
1985-200.ASM	1986	Hackbarth, Mark R., and Lanita Van Nimwegen	Stanfield-Maricopa Laterals, Task 28 and 33 - Maricopa-Stanfield Irrigation District East Main Canal	Northland Research, Inc. Flagstaff
1985-226.ASM	1985	Plog, Fred & others	All American Pipeline Right-of-Way	New Mexico State University
1986-20.ASM	1986	Quillian, Patricia M.	Maracopa-Stanfield Laterals	Northland Research, Inc. Tempe
1988-145.ASM	1989	MacDonald, Lynne B.	Loel Ranch Canals, Maricopa-Stanfield Irrigation District	BOR, Phoenix
1988-233.ASM	1988	MacDonald, Lynne B.	Maricopa-Stanfield Irrigation District, Pressure Pipeline	BOR, Phoenix
1996-301.ASM	1996	Wright, Thomas E.	Interstate 8/Casa Grande	Archaeological Research Services, Inc.
2006-18.ASM	2006	Howell, Todd	Transwestern Pipeline Phoenix Extension - Ashfork to Coolidge	TRC Environmental
2008-85.ASM	2008	Fahrni, Grant	APS On-Call Cultural Resources Surveys	Logan Simpson Design Inc.
2012-594.ASM	2000	North, Chris D.	All American Pipeline Survey/El Paso Natural Gas Line No. 2000	SWCA Environmental Consultants, Inc. Flagstaff
2015-83.ASM	2015	Hill, Rebecca J. and Leigh Davidson	Barnes Road and Fuqua Road	Logan Simpson Design Inc.
2022-419.ASM	2022	Brack, M. L.	Zinke Irrigation Pivots Class III	Tierra Right-of-Way Services, LTD
2025-537.ASM	2026	Dall, Fulwood and Rayle	Marigold Phase I Cultural Survey project	TYPSA, Inc.

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Report ID	Year	Author	Project	Company
2026-84.ASM	2026	Cooper et al.	Marigold Phase II Cultural Survey Project	Logan Simpson

The ASM records search also indicated that a total of 38 previously recorded cultural resource sites have been identified within the 1-mile buffer of the Project area (**Figure 5 (Confidential Appendix B)**), of which seven are historic and 31 are prehistoric. Five of these sites have been determined eligible, and one determined not eligible for NRHP by SHPO, and another seven have been recommended eligible, and three recommended not eligible for NRHP. Nine of the 38 sites within the 1-mile buffer of the Project area are within or adjacent to the APE, and are detailed below and in **Table 2** (in bold).

Per SRP archaeologists, Class III surveys of the Project Area are ongoing. The survey by TYP SA of the Project Area north of SR 84 has been completed and has recorded five new sites, one historic district, three linear features and 38 isolates (see **Table 2** and **Figure 5 (Confidential Appendix B)**) (Dall, et al. 2026). South of SR 84, the Class III survey conducted by Logan Simpson has identified at four new sites, six linear features and 123 isolated artifacts (see **Table 2** and **Figure 5 (Confidential Appendix B)**). This report is forthcoming, and the only available information to date is location and brief site descriptions. Class III surveys have not yet included the expansion areas.

Table 2. Cultural Resources within or adjacent to APE (sites in bold are recorded with ASM)

Site #	Site Type	Site Description	NRHP Status	Location
AZ AA:1:66(ASM) (Shelltown)	Prehistoric	Hohokam era habitation Site with burials	Recommended eligible (Hackbarth 1990)	Within APE
AZ AA:1:126(ASM)	Historic	Historic Stanfield Road	Determined not eligible (SHPO 2018)	Within APE
AZ AA:1:171(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within APE
AZ AA:1:172(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within APE
AZ AA:1:173(ASM)	Historic	Historic irrigation ditch	Recommended not eligible (Howell 2007)	Within APE
AZ AA:1:497(ASM) (Shelltown)	Prehistoric	Hohokam era artifact scatter, to be consolidated with AZ AA:1:66(ASM)	Recommended eligible (Bellavia 2006)	Adjacent to APE
AZ AA:1:502(ASM) (Shelltown)	Prehistoric	Hohokam era habitation site, to be consolidated with AZ AA:1:66(ASM)	Recommended eligible (Bellavia 2006)	Adjacent to APE
AZ AA:2:118(ASM)	Historic	Historic State Route 84	Portions determined eligible (SHPO 2009)	Adjacent to APE
AZ Z:4:24(ASM)	Prehistoric	Hohokam era artifact scatter	Recommended not eligible (Hackbarth 1990)	Adjacent to APE
AZ AA:1:1 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic open dump	Prehistoric: unevaluated Historic: recommended not eligible (Dall et al 2026)	Within APE
AZ AA:1:2 (TYP SA)	Historic	Hohokam era artifact scatter; historic open dump	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within APE

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AZ AA:1:3 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic agricultural processing facility	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within APE
AZ AA:1:4 (TYP SA)	Historic and Prehistoric	Hohokam era artifact scatter; historic open dump	Prehistoric and historic: recommended not eligible (Dall et al 2026)	Within APE
AZ AA:1:5 (TYP SA)	Prehistoric	Hohokam era artifact scatter	Recommended not eligible (Dall et al 2026)	Within APE
Montgomery Farms District (TYP SA)	Historic	Architectural components of historic farm complex	Recommended not eligible (Dall et al 2026)	Within APE
HIUS-1 (TYP SA)	Historic	16 MSIDD Lateral System canals	Recommended not eligible (Dall et al 2026)	Within APE
HIUS-2 (TYP SA)	Historic	Unnamed Agricultural Road Network	Recommended not eligible (Dall et al 2026)	Within APE
HIUS-3 (TYP SA)	Historic	4 Earthen Levees	Recommended not eligible (Dall et al 2026)	Within APE
FN-034 (LS)	Historic	Historic features and artifacts	Not yet evaluated	Within APE
FN-075 (LS)	Historic	Historic features and artifacts	Not yet evaluated	Within APE
FN-089 (LS)	Historic and Prehistoric	Euro American structural/agricultural features and Hohokam artifact scatter	Not yet evaluated	Within APE
FN-115 (LS)	Historic	Historic house and artifacts	Not yet evaluated	Within APE
IO-116, 122, 127, 131, 132, 133 (LS)	Historic	Abandoned ditches	Not yet evaluated	Within APE

AZ AA:1:66(ASM): This site, called Shelltown by archaeologists and first recorded in 1984, as an artifact scatter of moderate density surrounding at least two dozen areas of very high artifact density. The site is associated with the Hohokam Pioneer through Classic periods. Pothunting uncovered whole rooms with adobe walls as well as possible inhumation and cremation burials. Ceramics recorded include Gila and Wingfield Plain, Snaketown, Gila Butte, Santa Cruz, Sacaton, red-on-buffs, Gila and Salt Red, and others. Other artifacts recorded include ground and chipped stone, shell bracelets, debitage, raw shell and burnt bone (possibly cremations).

Test excavations and data recovery at Shelltown were conducted by Northland Research from the spring of 1985 through the spring of 1986, as part of the construction of the Santa Rosa Canal, a large distribution aqueduct, and associated delivery canals for the Maricopa-Stanfield Irrigation and Drainage District (MSIDD) (Marmaduke and Martynec 1993). The southwestern corner of Shelltown was impacted by the Santa Rosa Canal, while a smaller distribution canal of the MSIDD that connects with the Santa Rosa Canal cut through the northern edge of the mapped site. The excavations uncovered twelve cremations containing at least 15 individuals, along with ceramic jars and bowls, stone bowls and tools, shell and plant remains. Physical and relative dating placed the site to between the early to late middle A.D. 800s, and A.D. 925-1025, and also indicated that not many structures were contemporary in use, but that the total times of occupation probably spread over at least 200 years in the aggregate. However, only three percent of the site was excavated in the 1980s, and it is possible that there may be more substantial village-like settlements at Shelltown than those uncovered during excavation.

Shelltown appears to have been inhabited by specialized craftsmen – jewelry and ornament makers – and artifacts found at the site include bracelets, pendants, effigy figures, beads, and rings made from as many as 36 separate species of marine shell obtained from the Gulf of California or, in lesser degree, the Pacific Ocean; mosaic inlays and pendants of turquoise, muscovite, pyrite, copper ores, and galena; pendants and beads ground from schist and slate, or adapted from a quartz crystal. Debris left from the manufacture of the shell ornaments was present in copious amounts, giving the suggestion that this was the most frequent task engaging the energies of the resident artisans. Everything from finished ornaments as elegant as *Glycymeris* sp. shell bracelets adorned with figures, to the waste chips and grindings spun off in their making was present at Shelltown, as well as the tools required to accomplish the task, including reamers, abrading palettes, abrasive blocks, files, saws, lithic flakes, including minute micro drill bits of burinated chalcedony for piercing the centers of minuscule shell beads. Out of the 68 houses and other structures investigated at Shelltown and the nearby Hind Site, 25 bore the ground dust and chipped flakes of worked marine shell packed into their floors or filling their trash. Fifty-nine rendered up stone tools exhibiting dustings of ground shell, and nearly all had some sort of shell manufacturing debris associated with them.

SWCA revisited the location where AZ AA:1:66(ASM) had previously been recorded. The project's report (Bellavia et al. 2006) does not include an update, and no ASM site card update was included with the project submission. The previously recorded site boundary mapped in the report is only a dot for the approximate site location, rather than the full site boundary. However, the project did record the following new sites in approximately the same location as AZ AA:1:66(ASM): AZ AA:1:495(ASM), AZ AA:1:497(ASM), AZ AA:1:498(ASM), AZ AA:1:501(ASM), and AZ AA:1:502(ASM). Per ASM, these sites will likely be consolidated under AZ AA:1:66(ASM) in the future. Additional sites recorded by SWCA to the southeast of the mapped site boundary of AZ AA:1:66(ASM), including AZ AA:1:494(ASM), AZ AA:1:496(ASM), AZ AA:1:499(ASM), and AZ AA:1:500(ASM), may also be associated. Additionally, cursory observations by SRP for the current Project suggests that the site may extend further north than previously mapped. Site AZ AA:1:66(ASM) was recommended eligible for the NRHP (Hackbarth 1990).

AZ AA:1:126(ASM): This site, recorded in 2000, is the historic Stanfield Road, a north-south trending section line road that intersects SR 84 in the town of Stanfield, Arizona. North of Stanfield, the road is a crowned and ditched dirt road that is 25 feet, 3 inches wide. The road becomes paved in Stanfield, remaining paved south of town. Stanfield Road is a locally important road that provides access to farm land north and south of the town of Stanfield, Arizona. It appears on the 1924 Casa Grande 15' USGS quadrangle map, but it does not exist on the 1914 GLO map of Township 6 South, Range 4 East. Therefore, the road is at least 76 years old, but it is no more than 86 years old. Stanfield Road is maintained on a regular basis. It was determined ineligible for the NRHP by SHPO in 2018, as it retains no historical integrity. Further, the road is an in-use historic-age structure.

AZ AA:1:171(ASM): This site, recorded in 2006, is a north-to-south oriented concrete-lined irrigation ditch located 0.5 mile north of Barnes Road and 0.5 mile south of Miller Road, and originally part of an individual farm dating to 1920. The ditch measures 4 m wide and averages approximately 1 m deep. The ditch is located between two north-south trending two track access roads and plowed fields to either side. Vegetation on site was sparse, but included Russian thistle and cotton. This irrigation ditch lies within MSIDD. Farms within the district were established as early as the mid 1910s; however, the district was created in 1962. Farmers within the district began lining earthen ditches with concrete in the 1980s to obtain CAP water. Addition of concrete to earlier ditches has removed the original fabric of the site. Site AZ AA:1:171 (ASM) was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007). It is recognized,

however, that this in-use historic structure may have unevaluated significance as part of an irrigation district that remains unevaluated.

AZ AA:1:172(ASM): This site, recorded in 2006, is a north-to-south oriented concrete-lined irrigation ditch located 0.5 mile north of Barnes Road and 0.5 mile south of Miller Road, and originally part of an individual farm dating to 1930. The ditch measures 2 m wide and averages approximately 75 cm deep. The ditch is located between two north-south trending two track access roads and plowed fields to either side. Vegetation on site was sparse, but included Russian thistle and other small bushes growing on a layer of sandy loam. This irrigation ditch lies within the MSIDD. Farms within the district were established as early as the mid 1910s. Prior to the district's formation individual farmers constructed and operated earthen irrigation ditches along each field; irrigation water was provided from individually owned wells dug into the aquifer. Farmers within the MSIDD district began lining earthen ditches with concrete in the 1980s to obtain CAP water. Addition of concrete to earlier ditches has removed the original fabric of the site. Site *AZ AA:1:172 (ASM)* was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007). It is recognized, however, that this in-use historic structure may have unevaluated significance as part of an irrigation district that remains unevaluated.

AZ AA:1:173(ASM): This site, recorded in 2006, is an earthen levee situated in an open, flat area located north of Barnes Road beside the Santa Cruz wash. The levee was constructed in the early 1960s to confine the Santa Cruz Wash to a single channel, protecting farms in the MSIDD and other irrigation districts. Russian thistle and various other bushes and grasses grow on sandy loam soils. Agricultural fields are located on both sides of the levee, with 2 two-track roads running parallel to the earthen construction. The north-south oriented levee measures 65 m wide at the top and 15 m wide at the base. It is 15 m deep and extends for an unknown length and therefore has an unknown site area. The berms on either side of the ditch measure 10 m in width, and the sloping sides of the construction each measure 15 m. No artifacts were found in association with the site. The site is near the center of the MSIDD, created in 1962. Farms within the district were established as early as the mid 1910s and Congress authorized funding for flood control in 1958; construction of the levee system was completed in the early 1960s. The levee system controlling the wash is currently in-use and levee maintenance is ongoing. Site *AZ AA:1:173 (ASM)* was recommended not eligible for the NRPP because it lacks integrity of materials, feeling, and association and is not eligible under Criteria A through D (Howell 2007).

AZ AA:1:497(ASM): This site, recorded in 2006, is a large preclassic Hohokam artifact scatter with a smaller, localized areas of dense artifacts (Figures 12 and 13). Overall, the site is estimated to have more than 1000 artifacts that consist almost exclusively of ceramics. The majority of artifacts are in an area approximately 86 × 58m (E-W × N-S) near the center of the site. The ceramic assemblage is dominated by Gila Plain, Gila and Salt variety sherds, however red-on-buff and buffwares are also present. A single plainware spindle whorl was also observed, along with one piece of Glycymeris shell, 12 flakes, four pieces of fire-cracked rock, and ten fragments of vesicular basalt metates and manos. While no cultural features were observed at the site, the variety of artifact types and numbers suggest cultural subsurface deposits may still exist. The site is in fair condition with disturbance from sheet wash erosion, livestock grazing, and a two-tracks. Because of the presence of several core concentrations of artifacts, a relatively diverse artifact assemblage, and the possibility for subsurface remains, SWCA recommended site *AZ AA:1:497(ASM)* as eligible for inclusion in the NRHP under criterion D (Bellavia et al. 2006). Site *AZ AA:1:497(ASM)* overlaps the current boundary of *AZ AA:1:66(ASM)*, and therefore, per ASM, will likely be consolidated under *AZ AA:1:66(ASM)* in the future.

AZ AA:1:502(ASM): This site, recorded in 2006, is an extremely large preclassic Hohokam habitation site with heavy to light artifact concentrations and scatters across the site. There are three loci (Loci A–C) containing very dense artifact concentrations surrounded by areas of moderate to light artifact scatters. The loci with high-density artifact concentrations, as well as some of the moderately dense scatters, are clearly the result of pot hunting and subsequent sheet wash erosion. The site is located on a flat alluvial plain with several small drainages. There are an estimated 15,000 artifacts within the site, most of which have been exposed by the pothunters. The surficial evidence of the site includes only artifacts, as no cultural features were observed. Ceramics observed at the site include Gila Plainware, both Gila and Salt variety, Santa Cruz/Sacaton Red-on-buff, one Casa Grande Red-on-buff jar sherd, buffware, and some Wingfield Plain sherds. Lithics observed include at least 115 ground stone fragments, most of which are small, and 125 flakes and flaked stone tools. Sixteen fragments of bracelets and unworked Glycymeris shell were identified. Additionally, burned bone was observed in the backdirt of a pothunter's hole. It could not be determined if the bone was human or faunal.

Pot hunting coupled with sheet wash erosion has severely disturbed site AZ AA:1:502(ASM). Only nine of the pothunter's holes were mapped but there are a number of others. Man made and natural disturbances have left the site in poor to fair condition. Based on the large number and types of artifacts exposed it is almost certain that subsurface cultural features exist. The site was likely a long-term Preclassic Hohokam habitation site that is located approximately 2300m west of Santa Rosa Wash and could contain pithouse features and human burials. The site is in poor to fair condition with disturbance from sheet wash erosion and human vandalism/pot hunting. Because of the presence of several core concentrations of artifacts, a diverse artifact assemblage, and the possibility for subsurface remains, SWCA recommended site AZ AA:1:502(ASM) as eligible for inclusion in the NRHP under criterion D (Bellavia et al. 2006). Site AZ AA:1:502(ASM) overlaps the current boundary of AZ AA:1:66(ASM), and therefore, per ASM, will likely be consolidated under AZ AA:1:66(ASM) in the future.

AZ AA:2:118(ASM): This site, first recorded in 1992, is Historic SR 84 (also named "Gila Bend to Tucson Highway", "Border Sunshine Way", and "Casa Grande Highway"), originally constructed in 1936. The highway was in use until the early 1960s when the new Interstate 8 replaced it. Two discontinuous segments of SR 84 were recorded in 1986, one of which is within one mile of the project APE. No remaining historic segments have been discovered within or adjacent to the project APE (Wright 1986). AZ AA:2:118(ASM) has been determined by SHPO to be eligible to the NRHP under Criterion D because it is part of the Historic State Highway System and for its significance as an important east-west transportation route in south-central Arizona prior to the construction of Interstates 8 and 10. However, many portions of the road are heavily modified and are not considered contributing elements to the site's significance. Nevertheless, abandoned portions of the old highway still exist that appear to retain many elements of historic integrity.

AZ Z:4:24(ASM): This site, recorded in 1986, low-density artifact scatter that covered an area of 45 by 100 m. Within this scatter were five artifact concentrations. Northland Research, Inc. undertook archaeological testing of portion of site AZ Z:4:24(ASM) to be impacted by construction of the MSIDD canal in October 1986 (Morgan 1986). Testing of these concentrations revealed shallow irregular deposits of cultural materials. No prehistoric features were identified. The material here was restricted to the surface. Artifacts at the site included Santa Cruz Red-on-buff sherds, plain- wares, chipped stone debitage, ground stone tools, and one marine shell fragment. A total of 198 artifacts was recovered from the site, yielding an average of one artifact per 23 m². Based on diagnostic ceramics, the site appeared to date to the late Colonial Hohokam period. Further, the types and paucity of artifacts indicated that the site was used on a limited basis, possibly in conjunction with food processing activities. Northland Research

recommended site AZ Z:4:24(ASM) as not eligible for the NRHP due to lack of subsurface remains (Hackbarth 1990).

Historic Map Review

The BLM GLO survey plats are the earliest maps for the area (BLM 2026). The 1914 BLM GLO survey plat for Township 6 South, Range 3 East, shows “C.O. Adams House” in the southwest quarter of Section 13, and “B.J. Adams House” in the northwest quarter of Section 24, both within the Project APE. It also shows an unnamed road running north-south through Sections 13, 24 and 25, with multiple roads branching off of it to the east, as well as multiple washes running north to south through sections 26, 27, 34, 35 and 36, all within the Project APE. The 1914 BLM GLO for Township 6 South, Range 4 East, shows “Henry Ahler House” in the southwest quarter of section 5, “Ryan’s Field” and an associated well and pump house in the eastern half of section 30, and unnamed roads running northwest to southeast through Sections 30 and 31, all within the Project APE. Greene Wash can also be seen running north to south through the middle of Sections 5 and 8, intersecting the Project APE. The 1917 BLM GLO for Township 7 South, Range 4 East show an unnamed road running north to south through Section 5 but no other development.

Within the Project APE, BLM GLO Patent records reveal multiple homesteads within the project APE. Within Township 6 South, Range 3 East, the south half of Section 13 was granted to Valentine White in 1920; the north half of Section 24 was granted to Byron J. Adams (whose house appears on the 1913 BLM GLO survey plat) in 1917 while the southeast $\frac{1}{4}$ was granted to Marshall A Ramsey in 1919; the west half of Section 25 was granted to Everett J. Bryant in 1922 and the east half granted to David R. Kelsey in 1923; and the north half of Section 26 was granted to Anthony E. Del Bosco in 1921 while the south half was granted to Josephine A. Randolph and Josephine A. Patch in 1923. Also in Township 6 South, Range 3 East, within Section 34, the northwest half of the southwest $\frac{1}{4}$ and the southwest quarter of the southwest $\frac{1}{4}$ was granted to Martin Luther Porter in 1924, as well as the southeast $\frac{1}{4}$ and the southeast quarter of the southwest $\frac{1}{4}$ in 1929; the north half of Section 34 was granted to James M. Thornhill in 1930; the south half of Section 35 was granted to Cyrus E. Tindall in 1922, while the north half was granted to Marie E. Patch in 1926.

BLM GLO Patent records of Township 6 South, Range 4 East, also within the Project APE, reveal lots 5 and 12 and the west half of the southwest $\frac{1}{4}$ of Section 5, as well as the northwest $\frac{1}{4}$ of Section 8 were granted to Henry J. Ahler (whose house appears on the 1913 BLM GLO survey plat) in 1920; lots 3 and 4, the southeast $\frac{1}{4}$, and the east half of the southwest $\frac{1}{4}$ of Section 18 were granted to John M. Rainey in 1919 while lots 1 and 2 and the east half of the northwest $\frac{1}{4}$ were granted to John P. Garner in 1922; the east half of Section 30 was granted to Emliano Robles in 1920 while lots 1 through 4 and the east half of the west half were granted to Omer S. Auten in 1922; and the east half of Section 31 was granted to Harry Reed in 1922 while lots 1 through 4 and the east half of the west half was granted to Robert J. Tindall in 1922. BLM GLO Patent records of Township 7 South, Range 4 East, within the Project APE, reveal lots 1 through 4 and the north half of the south half of Section 5 were granted to Angelica H. Smith and Angelica H. Coleman in 1926; and lots 1 through 4 and the north half of the south half of Section 6 were granted to Imo C. Long in 1923. Numerous additional patents were granted to areas within the 1-mile buffer but outside the Project APE.

The earliest topographical maps of the area, from 1922 and 1924, only show the eastern half of the Project area. These maps show the Santa Rosa Wash running north to south through the northeast corner of the Project area, and what is now SR 84 running east to west through the project area (USGS 2026). Multiple additional roads crisscross the project area and a few structures are noted. The earliest topographical maps of the western side of the project area are from 1946 and show SR 84, but no other development

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(USGS 2026). There is no evidence of the town of Stanfield until the earliest aerals from 1953 and 1957, which also show agricultural development, as well as roads running north-south and east-west (mostly along BLM PLSS section lines) throughout the Project Area, and a stream or irrigation canal running northwest to southeast through the Project Area (Maricopa 2026; NETR 2026). Beginning in 1965, topographical maps and aerals show the addition of levees to the irrigation canals along SR 84. The Project Area remains agricultural up through the present.

5.0 MANAGEMENT RECOMMENDATIONS

The Class I cultural inventory identified 38 cultural resource sites within the 1-mile buffer of the Project area, nine of which intersect or are adjacent to the project footprint. Of these, one site, AZ AA:2:118(ASM), has been determined eligible for listing on the NRHP. Additionally, one site, AZ AA:1:66(ASM) (Shelltown, which also includes AZ AA:1:497(ASM) and AZ AA:1:502(ASM)), has been recommended eligible for listing on the NRHP, while one has been determined not eligible and another four recommended not eligible. Approximately 1.5 percent of the proposed Project footprint had been previously surveyed. However, pedestrian surveys of the entirety of the APE are currently being conducted by archaeologists contracted with SRP for the Marigold Energy Center Project. Pedestrian survey of the project area north of SR 84 has been completed and has recorded five new sites, one historic district, three linear features and 38 isolates, all of which have been recommended not eligible for listing on the NRHP (Dall, et al. 2026). South of SR 84, the Class III survey has identified at four new sites, six linear features and 123 isolated artifacts. These resources have not yet been evaluated for listing on the NRHP. Class III surveys have not yet included the potential expansion areas; we recommend that if SRP decides to utilized these areas, a Class III survey should be conducted, where feasible, prior to construction.

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APPENDIX A (NON-CONFIDENTIAL) — Figures

Figure 1. Project Area Aerial

Figure 2. Project Overview

Figure 3. Project Location

Figure 4. Records Search Result: Previous Studies

APPENDIX B (CONFIDENTIAL) — Bound Separately: Not for public review

Figure 5. Records Search Results: Sites

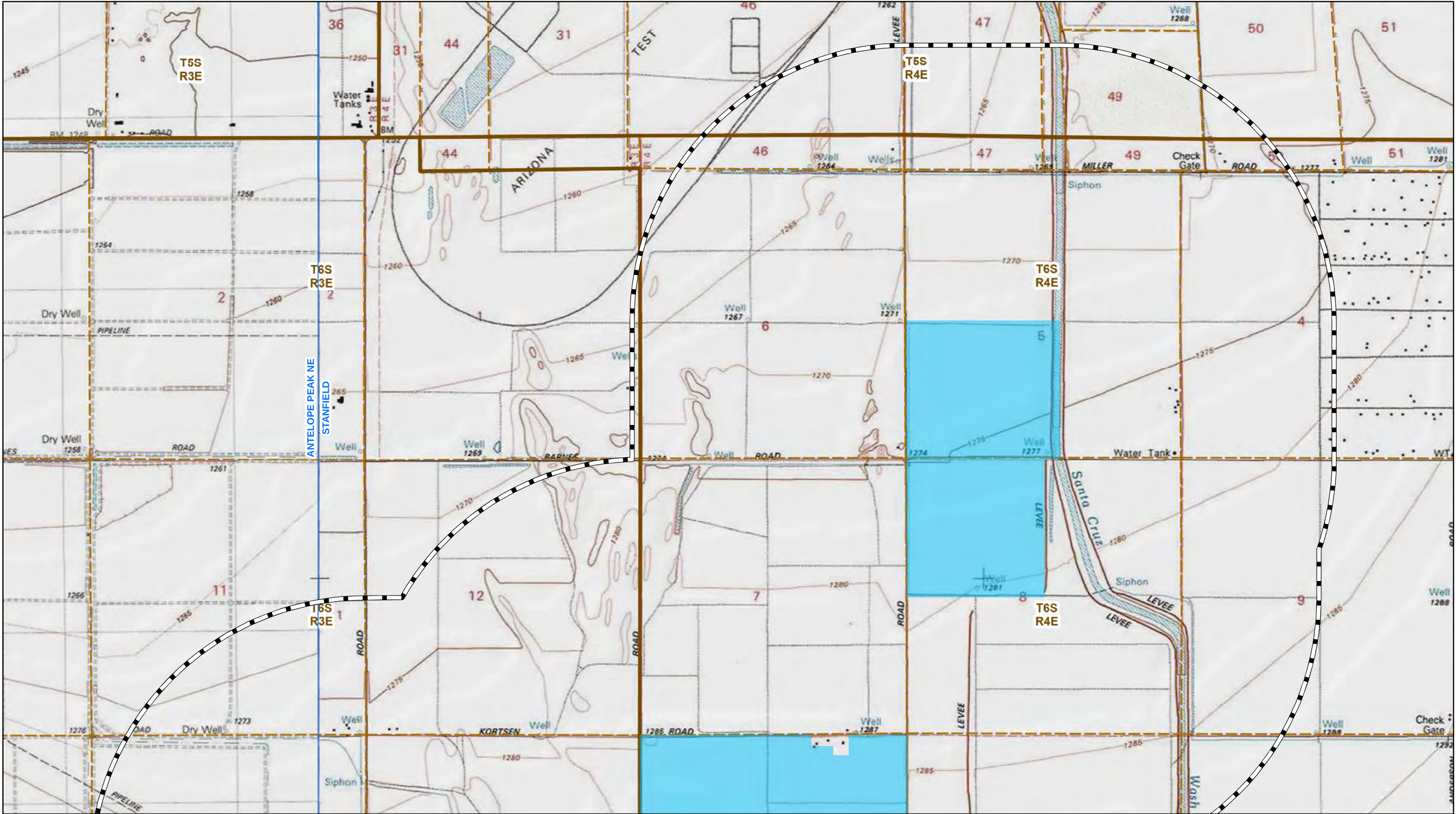
Appendix A: Maps (non-confidential)

Figure 1. Project Area Aerial

Figure 2. Project Overview

Figure 3. Project Location

Figure 4. Records Search Result: Previous Studies

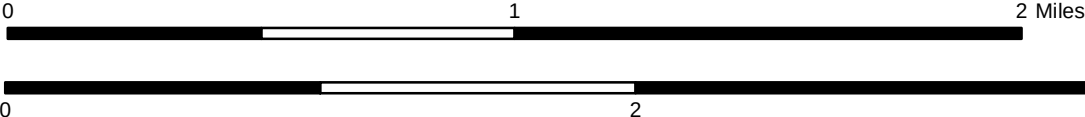


**Marigold
Energy Center**
Location Map

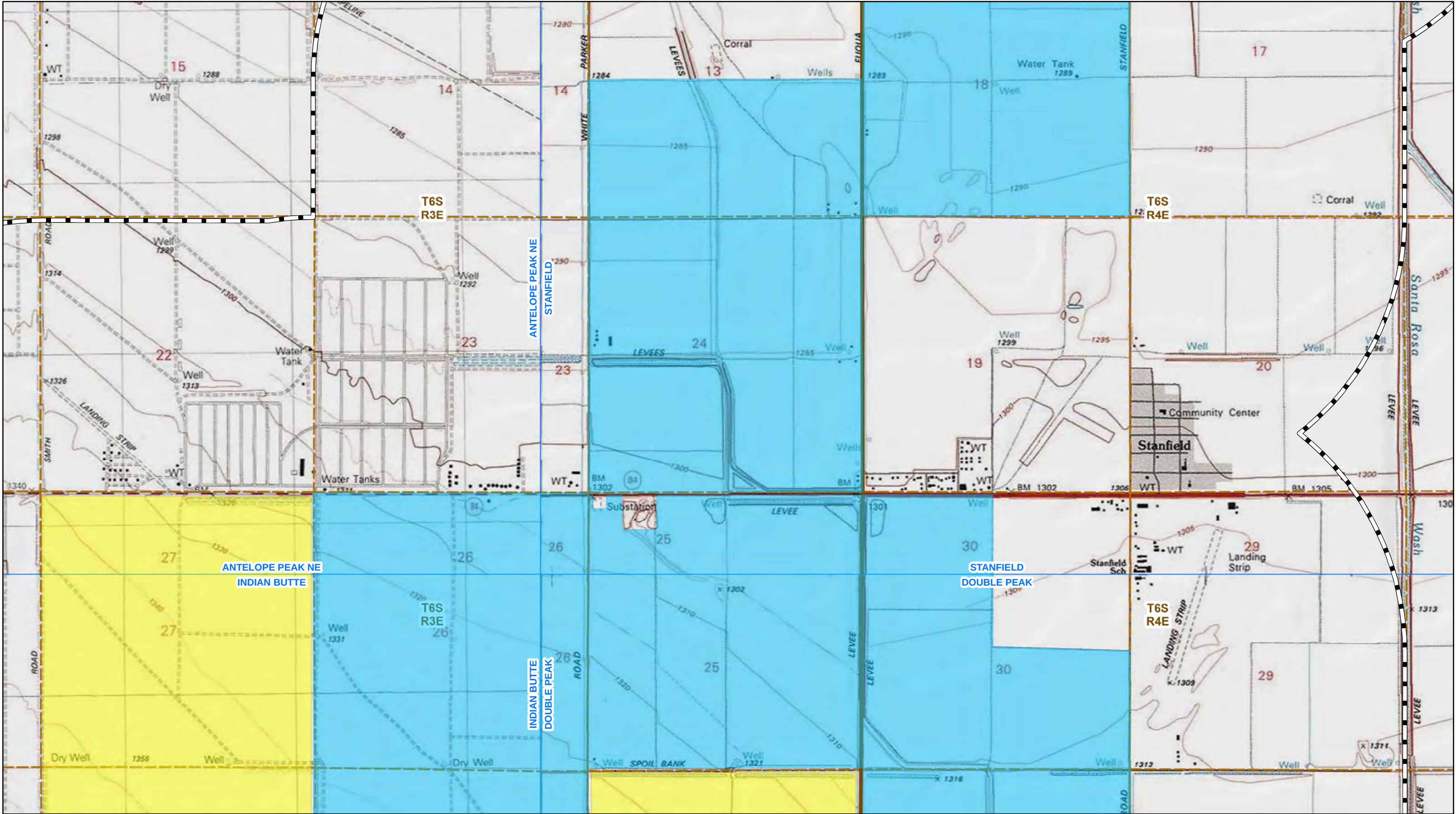
-  1 Mile Buffer
-  USGS 7.5' Quadrangle
-  Project Area
-  Potential Expansion



1:24,000



Kilometers
4



**Marigold
Energy Center**
Location Map



1 Mile Buffer



USGS 7.5'
Quadrangle



Project Area



Potential
Expansion



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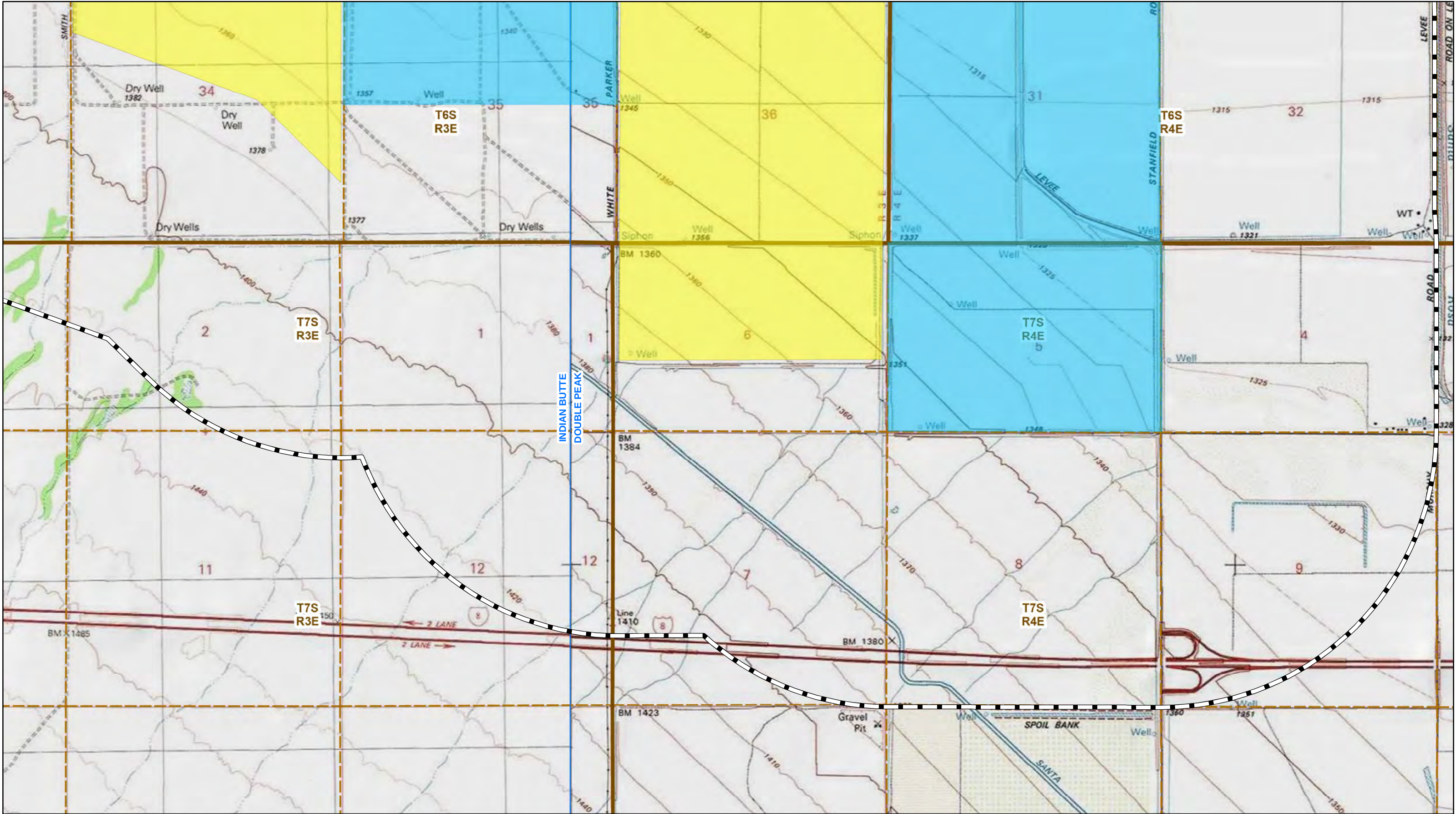
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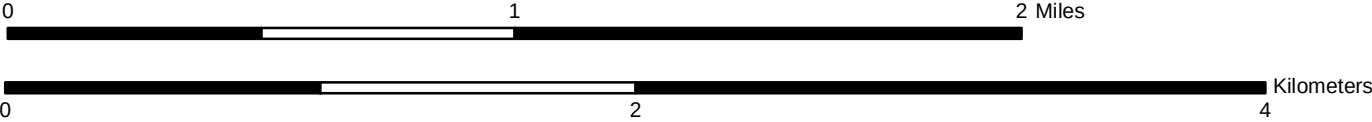


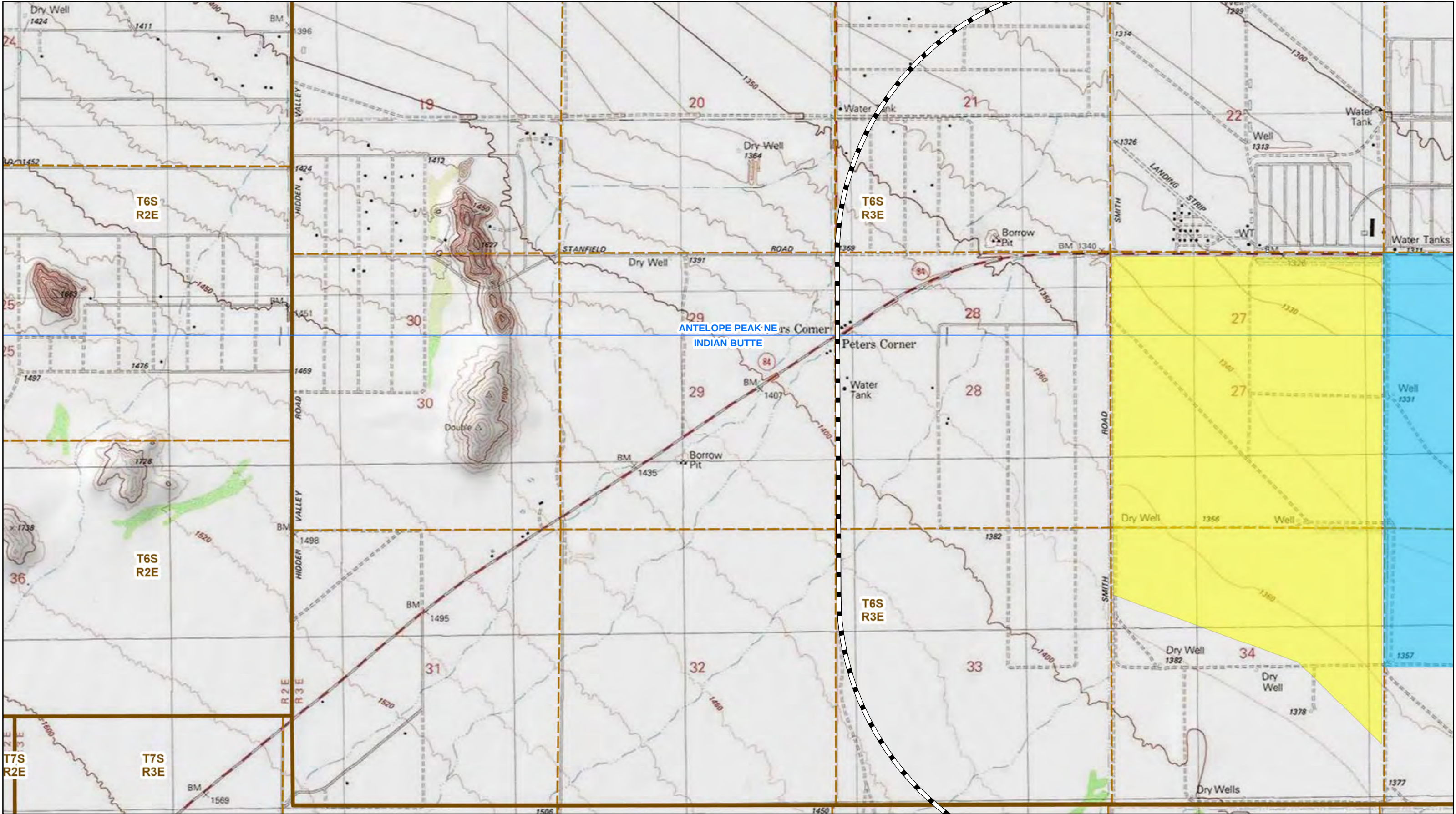
**Marigold
Energy Center**
Location Map

-  1 Mile Buffer
-  USGS 7.5' Quadrangle
-  Project Area
-  Potential Expansion



1:24,000



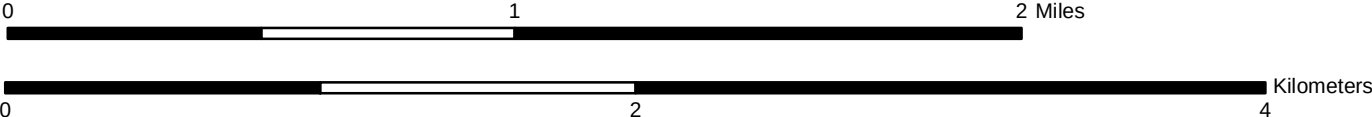


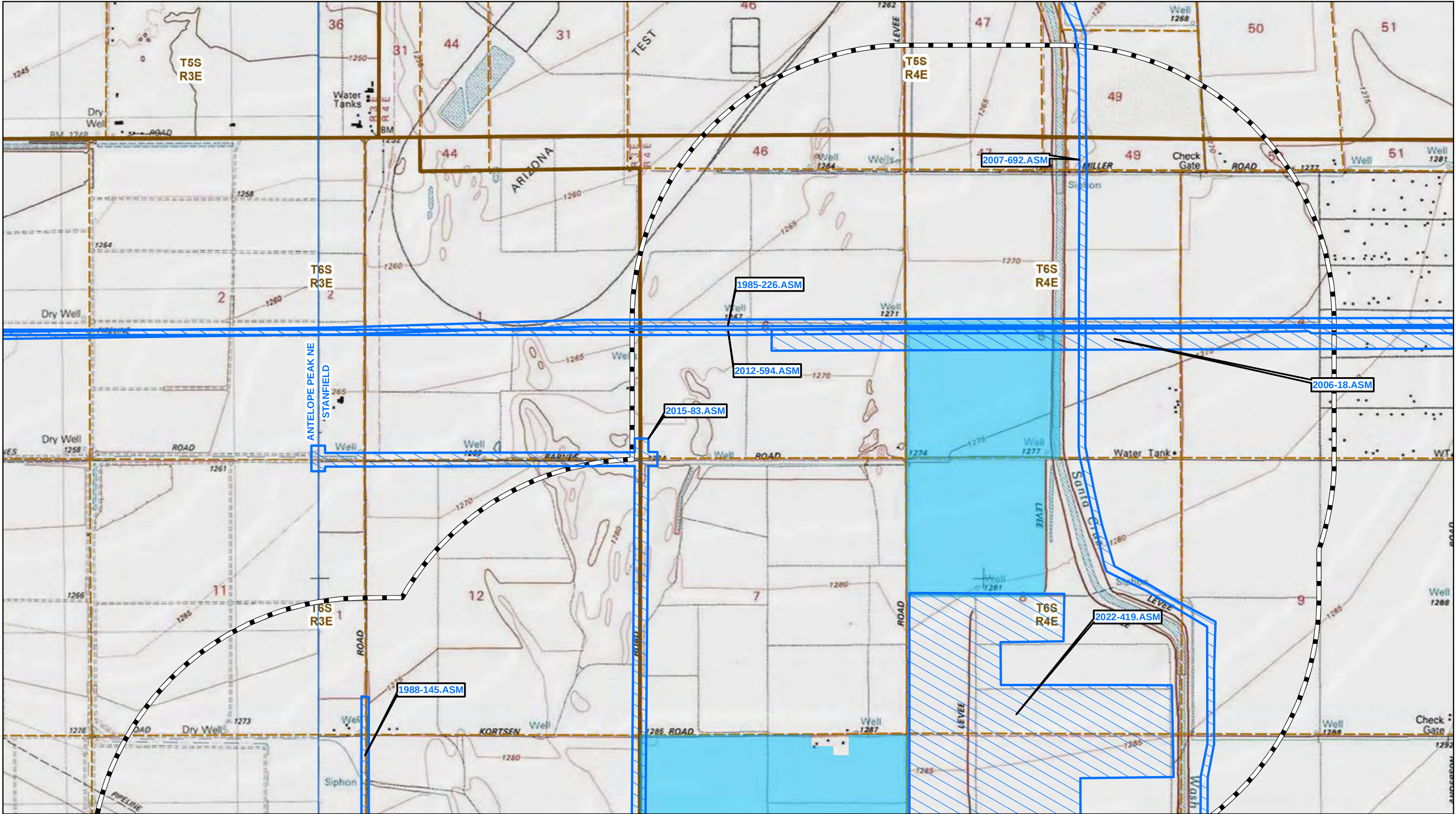
**Marigold
Energy Center**
Location Map

-  1 Mile Buffer
-  USGS 7.5' Quadrangle
-  Project Area
-  Potential Expansion



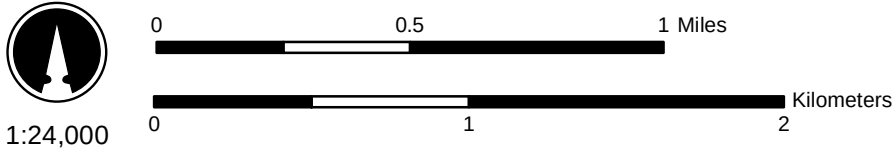
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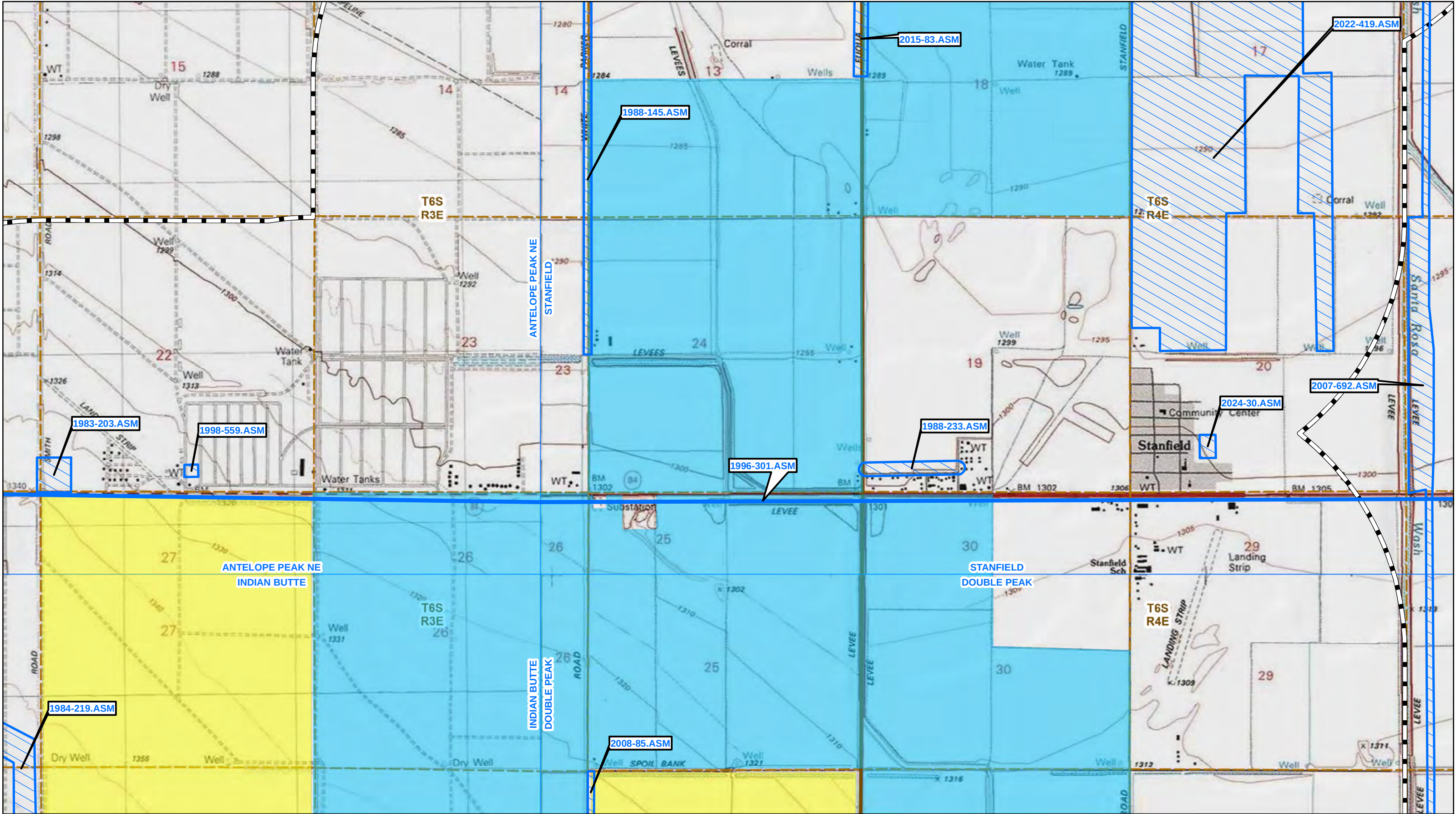




**Marigold
Energy Center**
Previous Studies

-  Previous Studies
-  Project Area
-  Potential Expansion
-  1 Mile Buffer
-  USGS 7.5' Quadrangle



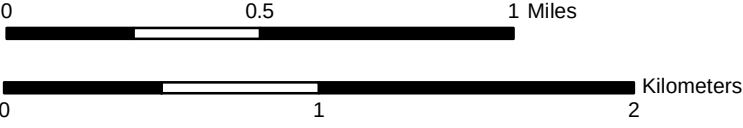


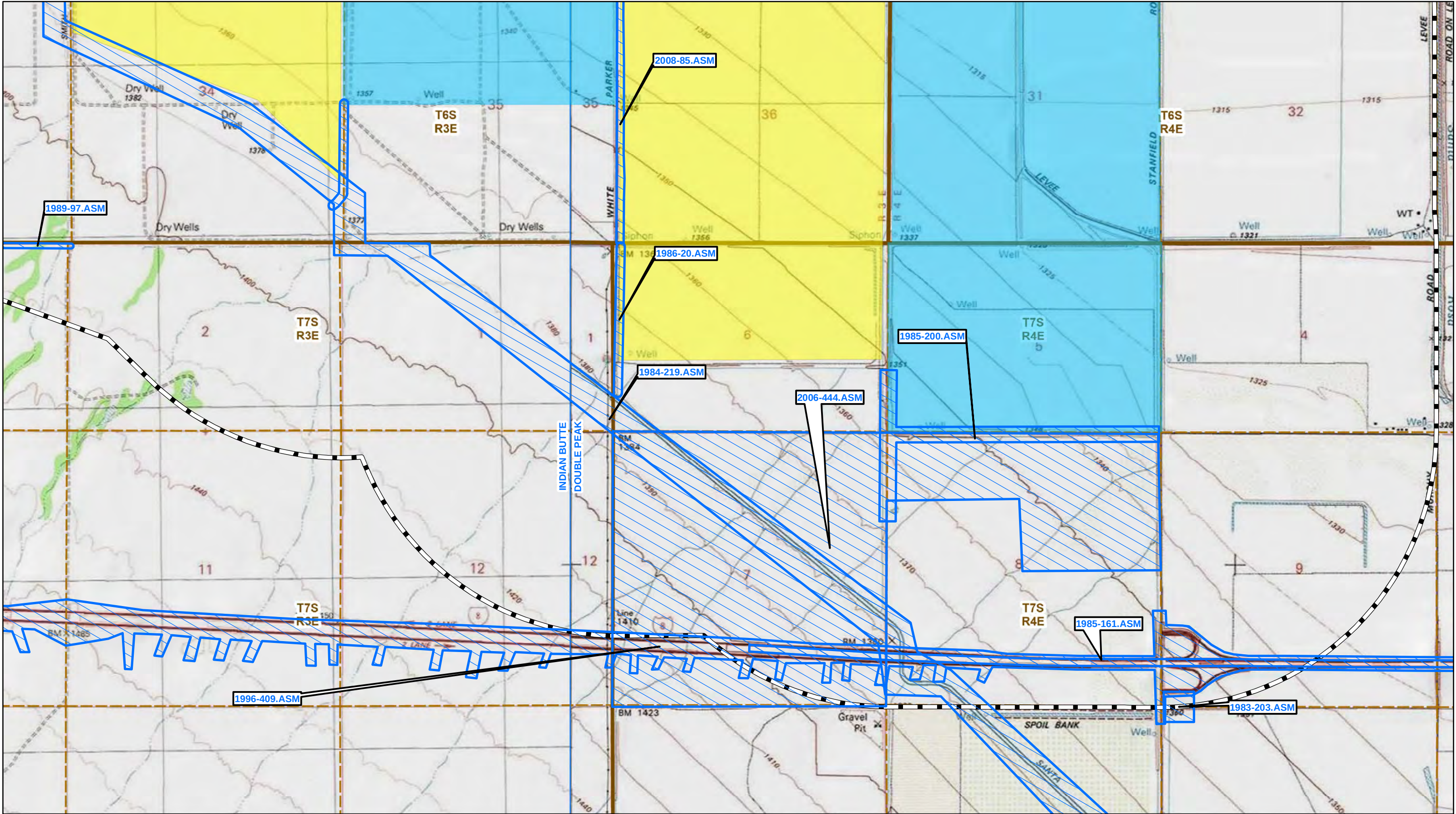
**Marigold
Energy Center**
Previous Studies

-  Previous Studies
-  Project Area
-  Potential Expansion
-  1 Mile Buffer
-  USGS 7.5' Quadrangle



1:24,000



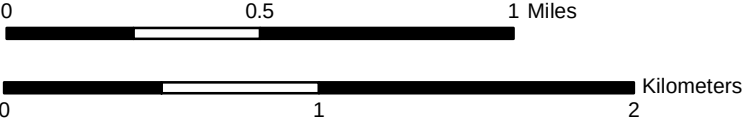


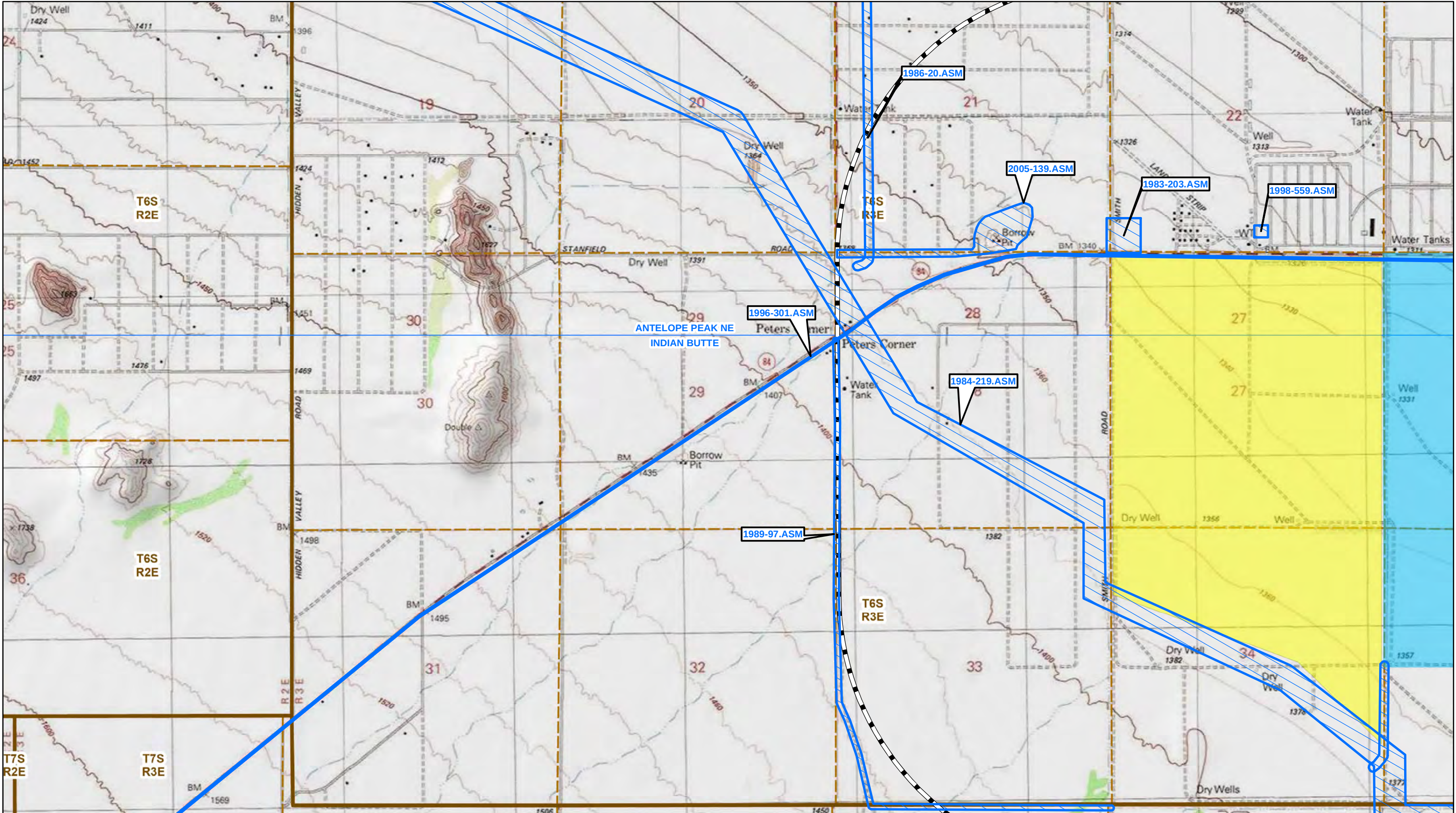
**Marigold
Energy Center**
Previous Studies

-  Previous Studies
-  Project Area
-  Potential Expansion
-  1 Mile Buffer
-  USGS 7.5' Quadrangle



1:24,000





**Marigold
Energy Center**
Previous Studies

-  Previous Studies
-  Project Area
-  Potential Expansion
-  1 Mile Buffer
-  USGS 7.5' Quadrangle



1:24,000



EXHIBIT E-2
TRIBAL AND SHPO CORRESPONDENCE

Tribe	Original Letter NO Enclosure	Original Letter w/ Enclosure	Copy of Original Letter w/ Enclosure	Email Original Letter NO Enclosures	Email Original Letter W/ Enclosures	Email Copy of Original Letter W/ Enclosure
Ak-chin Indian Community			Cultural Resources Program Ak-Chin Indian Community 42507 W. Peters & Nall Road Maricopa, AZ 85138	Mr. Gabriel Lopez, Chairman Ak-Chin Indian Community GLopez2@ak-chin.nsn.us		epeters@ak-chin.nsn.us and twind@ak-chin.nsn.us
Gila River Indian Community	Stephen Roe Lewis, Governor P.O. Box 97 Sacaton, AZ 85147					Larry.BenallieJr@gric.nsn.us and to Reylynne.Williams@gric.nsn.us
Hopi Tribe			Stewart Koyiyumtewa Tribal Historic Preservation Officer Hopi Tribe Cultural Preservation Office P.O. Box 123 Kykotsmobi, AZ 86039	Lamar Keevama, Chairman LaKeevama@hopi.nsn.us		
Mescalero Apache Tribe	Thora Walsh Padilla President Mescalero Apache Tribe P.O. Box 227 Mescalero, NM 88340		Ms. Holly Houghten Tribal Historic Preservation Officer Mescalero Apache Tribe P.O. Box 227 Mescalero, NM 88340			
Pascua Yaqui Tribe	Mr. Julian Hernandez Chairman Pascua Yaqui Tribe 7474 S. Camino de Oeste Tucson, AZ 85746		Dr. Karl A. Hoerig Tribal Historic Preservation Officer Pascua Yaqui Tribe 5100 W. Calle Tetakusim, Room 130 Tucson, AZ 85757			
Pueblo of Zuni	Mr. Arden Kucate Governor Pueblo of Zuni P. O. Box 339 Zuni, NM 87327					Mr. Kurt Dongoske Director, Tribal Historic Preservation Officer kdongoske@gmail.com
Salt River Pima-Maricopa Indian Community					Shane.Anton@srpmic- nsn.gov Angela.garcia-lewis@srpmic- ns.gov Martha.Martinez@srpmic- nsn.gov Sunday.Eiselt@srpmic- nsn.gov April.Lewis@srpmic-nsn.gov	
Tohono O'odham Nation					Richard Saunders, Director, Natural Resources Richard.Saunders@tonation- nsn.gov & Eric Verwys, Assistant Director, Natural Resources. Eric.Verwys@tonation- nsn.gov.	
White Mountain Apache	Orlando Carroll, Chairman White Mountain Apache Tribe P.O. Box 700 Whiteriver, AZ 85941		Mr. Mark Altaha Tribal Historic Preservation Officer White Mountain Apache Tribe Historic Preservation Office, P.O Box 1032 Fort Apache, AZ 85926			
Yavapai-Apache Nation					Mr. Buddy Rocha, Jr., Chairman brochajr@yan-tribe.org	Marley Juan, mjuan@yan- tribe.org Barbara McCabe, bmccabe@yan- tribe.org Olivia McMahon, omcmahon@yan-tribe.org

July 22, 2026

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

Re: SRP Marigold Energy Center Project
Arizona Corporation Commission Certificate of Environmental Compatibility

Dear Mr. Gabriel Lopez,

Salt River Project Agricultural Improvement and Power District (SRP) is proposing a 675-megawatt (MW) natural gas-fired simple-cycle power plant, located on 60 acres of SRP-owned property, and approximately 4.5 miles of double circuit 230-kilovolt (kV) transmission lines on SRP-owned property as well as across private lands and in Pinal County, near the community of Stanfield. SRP seeks a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Committee (ACC). A CEC is required for the Project because it includes a thermal generation plant and the proposed transmission line voltage is above 115 kV and over 1-mile in length. The Applicant anticipates filing the CEC application in August 2026.

The plant and transmission line are part of the larger proposed Marigold Energy Center, which would additionally include a 600-MW of solar photovoltaic generation, a 3200-megawatt-hour (MWh) Battery Energy Storage System (BESS), the 230/500 kV Marigold Substation, and a short double-circuit 500-kV transmission line that would connect the Marigold Substation to the existing SRP 500-kV double-circuit Duke-Pinal Central transmission line and serve as the Energy Center's connection to the regional grid. These additional components of the Marigold Energy Center are not subject to ACC review or certification.

SRP obtained a list of consulting parties using the Arizona Government-to-Government Consultation Toolkit in July 2026. Consulting parties are the Arizona State Historic Preservation Office (SHPO), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the White Mountain Apache, and the Yavapai-Apache Nation.

A Class 1 cultural resources inventory was prepared by PanGIS, Inc, for the entire proposed 5,000-acre Marigold Energy Center campus, including the plant and transmission line as well as the non-CEC portion of the Project. A copy of the report is attached for your review and comment.

We are inquiring whether you have any concerns regarding cultural resources as well as any sites of traditional, religious, cultural, or historical importance to your community within the Project vicinity. SRP will be filing the CEC Application in August, 2026 and hearings with the Arizona Power Plant and Transmission Line Siting Committee will start September 21, 2026. We would greatly appreciate your comments prior to filing our application by August 3, 2026. Please provide comments by mail, email or by phone at the information listed below:

Sarah Justus
Project Manager
280 Melba Rd
Encinitas, CA 92024
sjustus@kpenvironmental.com
608-279-0129

Your correspondence will be included as part of the Project record that is filed with the ACC. All cultural resource locational information, including maps, will be redacted from any copies of the document available to the general public. If you have any further questions or would like to discuss this document, please do not hesitate to contact Sarah Justus (sjustus@kpenvironmental.com; 608-279-0129) or me (dan.garcia@srpnet.com; 602-236-2336).

Cordially,

A handwritten signature in black ink, appearing to read 'Daniel Garcia', written over a horizontal line.

Daniel Garcia, M.A., RPA
SRP Senior Cultural Resources Management Specialist



Delivering water and power®



From: Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>

Sent: Tuesday, August 4, 2026 1:59 PM

To: Sarah Justus <sjustus@kpenvironmental.com>; Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>; Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Martinez, Martha <Martha.Martinez@SRPMIC-nsn.gov>; Lewis, April <April.Lewis@SRPMIC-nsn.gov>

Subject: RE: SRP Marigold Energy Center Project

[External]

The SRPMIC THPO has reviewed your consultation documents dated July 23, 2026. Our office defers to the Ak Chin Indian Community Cultural Resources Office and Gila River Indian Community THPO as leads in the consultation process for this project.

The SRPMIC THPO will continue to participate in this undertaking. Thank you for consulting with the SRPMIC THPO.



B. Sunday Eiselt, Ph.D
THPO Archaeologist
on behalf of Shane Anton, THPO
Cultural Resources Department
Salt River Pima-Maricopa Indian Community
1635 N. Longmore Rd
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov

Office: (480) 362 3347





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 Senior Cultural Resources Mngt.

Date: July 31, 2026

Re: *SRP Marigold Energy Center Project 675-Megawatt Power Plant*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; July 22, 2026. In regard to this, please refer to the following statement(s) below;

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed construction of a 675-megawatt natural gas-fired simple-cycle power plant, located on 60 acres of SRP owned property, and approximately 4.5 miles of double circuit 230-kilovolt transmission lines on SRP owned property, near the community of Standfield, in Pinal County, Arizona.

Please be advised, we have reviewed the information provided and determined the proposed project falls outside the White Mountain Apache tribe's aboriginal territory and therefore, we do not feel comfortable submitting a response for the project. At this time, we would like to defer all correspondences to the *Four Southern Tribes* to address the proposed project as they feel appropriate.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe
Trial Historic Preservation Officer

EXHIBIT F RECREATIONAL PURPOSES AND ASPECTS

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

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

Existing Conditions

Regional recreation information near the proposed Marigold Energy Center Project (Energy Center) and for the region and surrounding areas was gathered from Pinal County.

Regionally, Pinal County has a diverse geography which offers a multitude of recreational opportunities. The terrain within the county ranges from the mountainous eastern portion, with views at elevation up to 6,000 feet to primarily low valleys in the western portion, filled with desert vegetation. Within the large area encompassed by Pinal County, there are five State Parks, four Wilderness Areas, three National Monuments, two National Forests, a National Scenic Trail, approximately 60 miles of regional non-motorized multi-use trails, and several neighborhood/community parks associated with various mountain ranges such as the Superstition Mountains, Table Top Mountain, and the Palo Verde Mountains.

Recreational areas within, or just outside a one-mile buffer of the Transmission Line Project components, shown in **Figure F-1**, are described below.

Located approximately 90 feet east of South Stanfield Road, just outside the one-mile buffer is Stanfield Elementary School, in school district 24. The school includes multiple buildings, an outdoor playground, a parking lot, and the affiliated Pinal-Gila Community Child Services Preschool.

Located just outside of the northwest corner of the one-mile buffer is the Nissan Technical Center North America-Arizona Testing Center, Nissans only testing facility in North America. It is a 3,050-acre site, with 34 lane-miles of roads.

Potential Effects

The Transmission Line Project will not create a public recreation use; however, the Transmission Line Project will not preclude recreational uses in the area around the Project routes after construction.

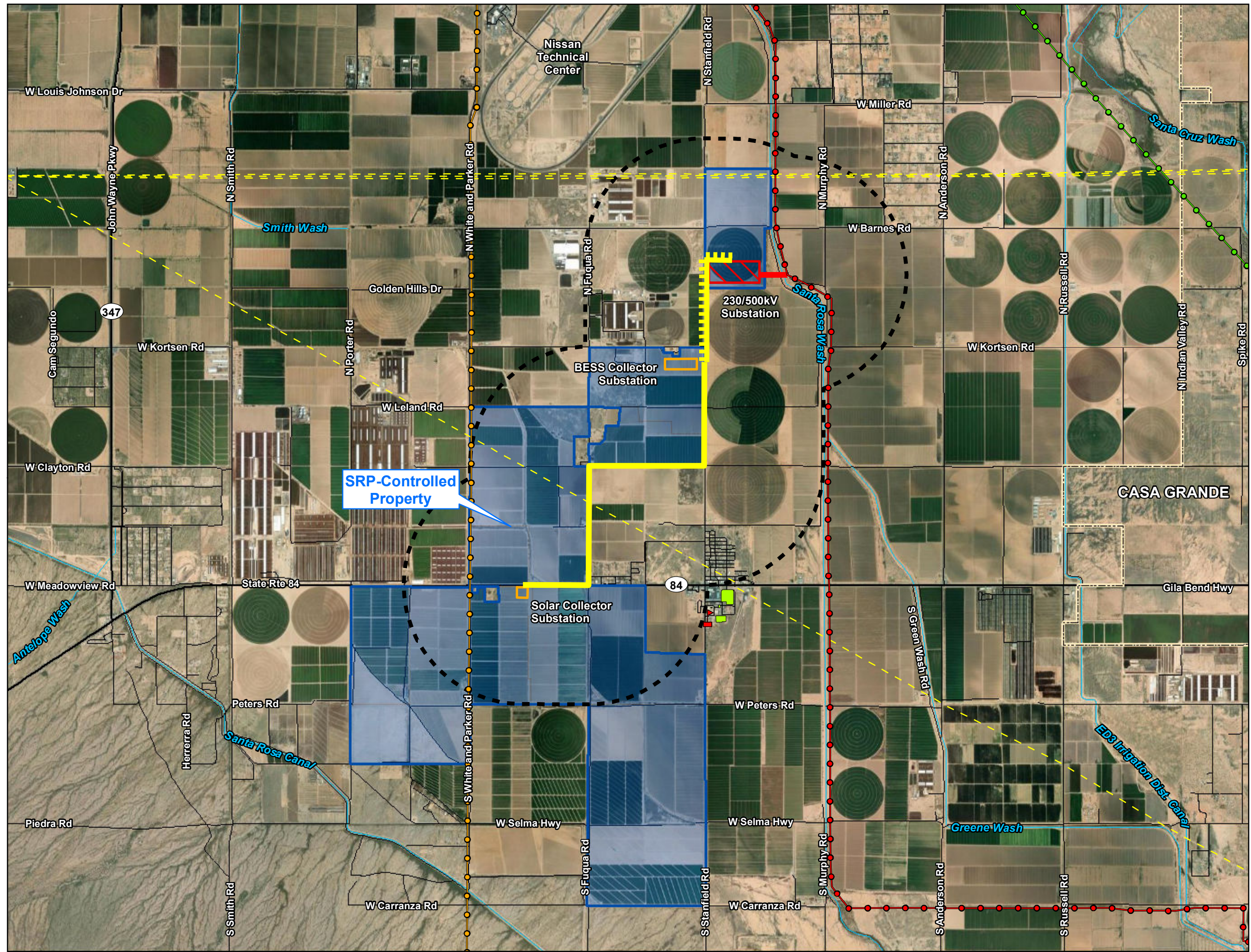
References

Google Earth Pro. 2026. Ariel imagery. Accessed May 2026

Pinal County. 2026. Open Space Trails and Regional Parks. Accessed 5/29/2026. Located at: <https://www.pinal.gov/658/Open-Space-Trails-Regional-Parks>

Pinal County. 2023. Open Space and Trails Map. Accessed 5/19/2026. Located at: <https://explore.pinal.gov/DocumentCenter/View/7116/Open-Space-and-Trails-Map---Updated-2023-with-Notes-PDF>

Stanfield Elementary School. 2026. Accessed 5/19/26. Located at: <https://www.goroadrunners24.com>



Legend

CEC Jurisdictional Project Components

- Transmission Line 1 – Double Circuit 230 kV
- Transmission Line 2 – Double Circuit 230 kV
- 1-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

- Proposed 500kV Connection
- Collector Substation Location
- 230/500 kV Substation Location
- SRP-Controlled Property

Recreation

- Recreational Facility

General Features

- School
- 500 kV Transmission Line
- 230 kV Transmission Line
- 115 kV Transmission Line
- Natural Gas Pipeline
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

0 0.25 0.5 0.75 1 Miles

ARIZONA

Phoenix Florence Pinal County

Map Extent

SRP

SRP PROJECT MARIGOLD

FIGURE F-1 RECREATION

Map Extent: Pinal County, AZ

Date: 8.10.26 Author: SJW

EXHIBIT G
CONCEPTS OF TYPICAL FACILITIES

In accordance with Arizona Administrative Code R14-3-219, the Applicant provides the following information:

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

The structure types depicted in Exhibit G-1, in particular Figures G-1, G-4, G-18, and G-19, are expected to be used for the Transmission Lines. Depending on the final engineering and design specifications, other structure types may also be utilized, which are depicted in Exhibit G-1 and listed below.

Figure G-1: Double-Circuit 230 kilovolt (kV) Single-Pole, Braced-Post

Figure G-2: Double-Circuit 230 kV Single-Pole, Davit-Suspension-Angle

Figure G-3: Double-Circuit 230 kV Single-Pole, Davit-Suspension-Tangent

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

Figure G-5: Single-Circuit 230 kV Single-Pole, DE-Vertical-Davit

Figure G-6: Single-Circuit 230 kV Single-Pole, Vertical-Braced-Post

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

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

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

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

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

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

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

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

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

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

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

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

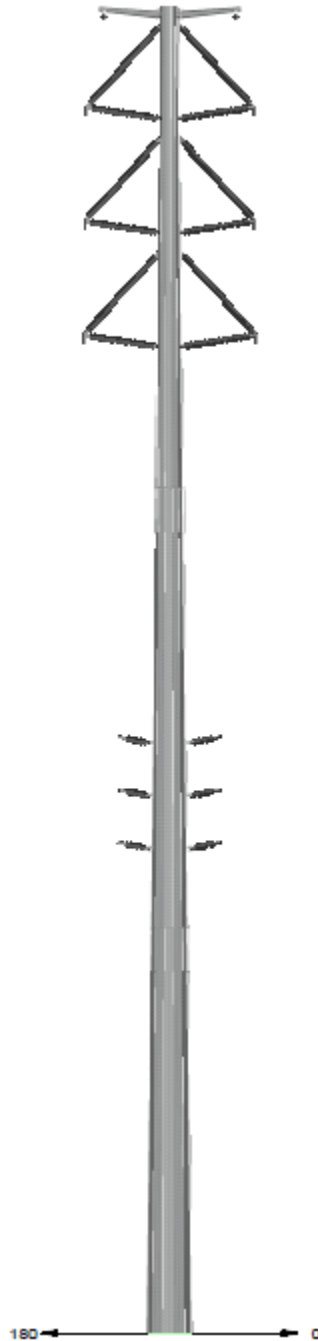
Figure G-19: Single-Circuit 230 kV Single-Pole, DE-Vertical

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

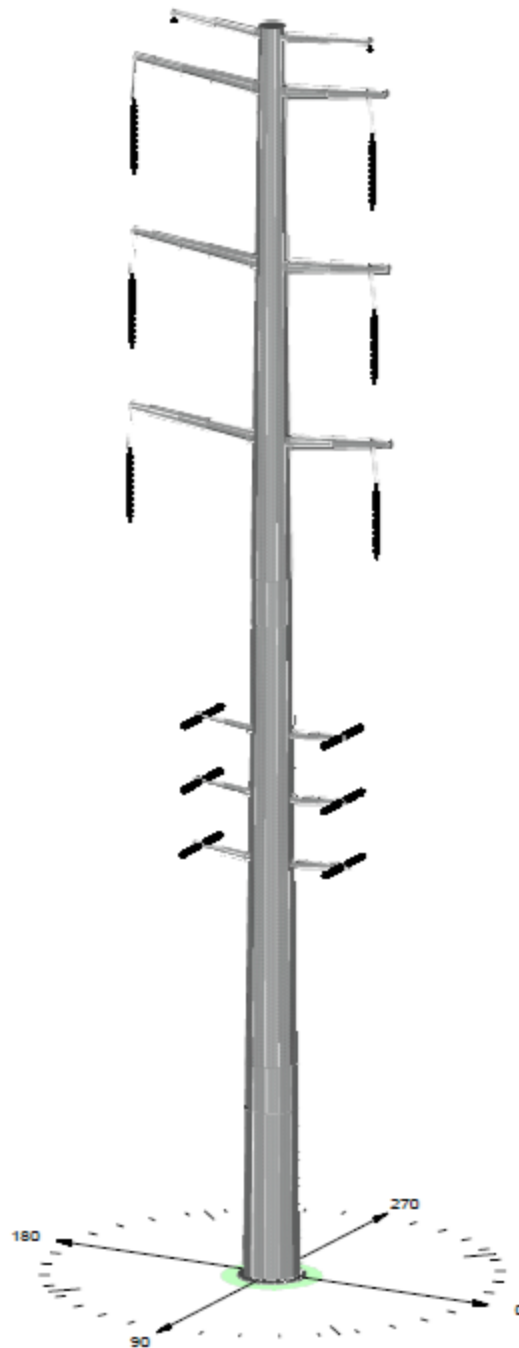
Figure G-21: Single-Circuit 230 kV Single-Pole, Vertical-Post

Figure G-22: Single-Circuit Riser Pole, Two Cables Per Phase

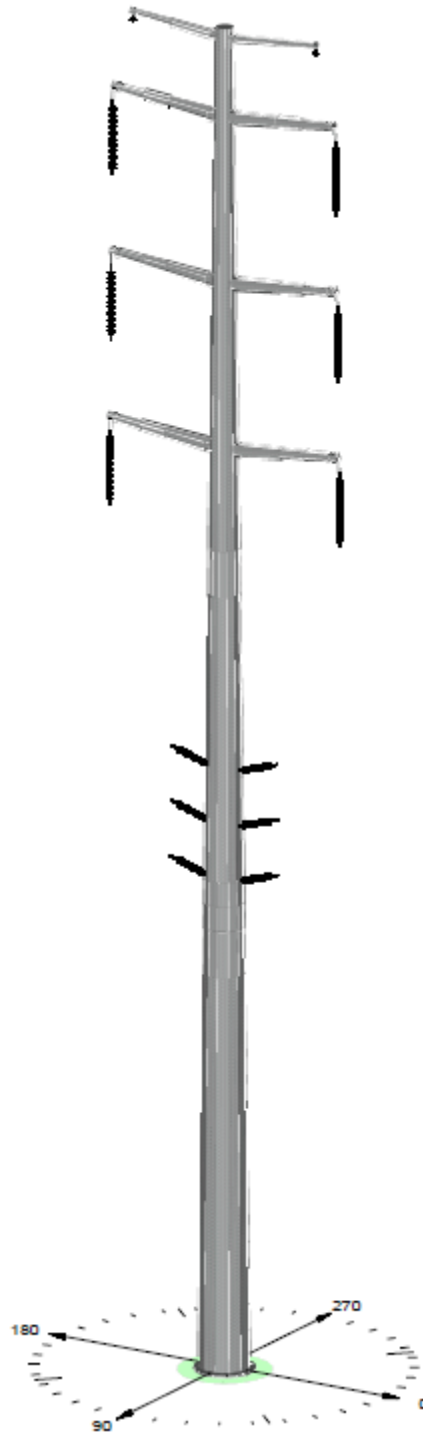
Figure G-23: Single-Circuit Riser Pole, One Cable Per Phase



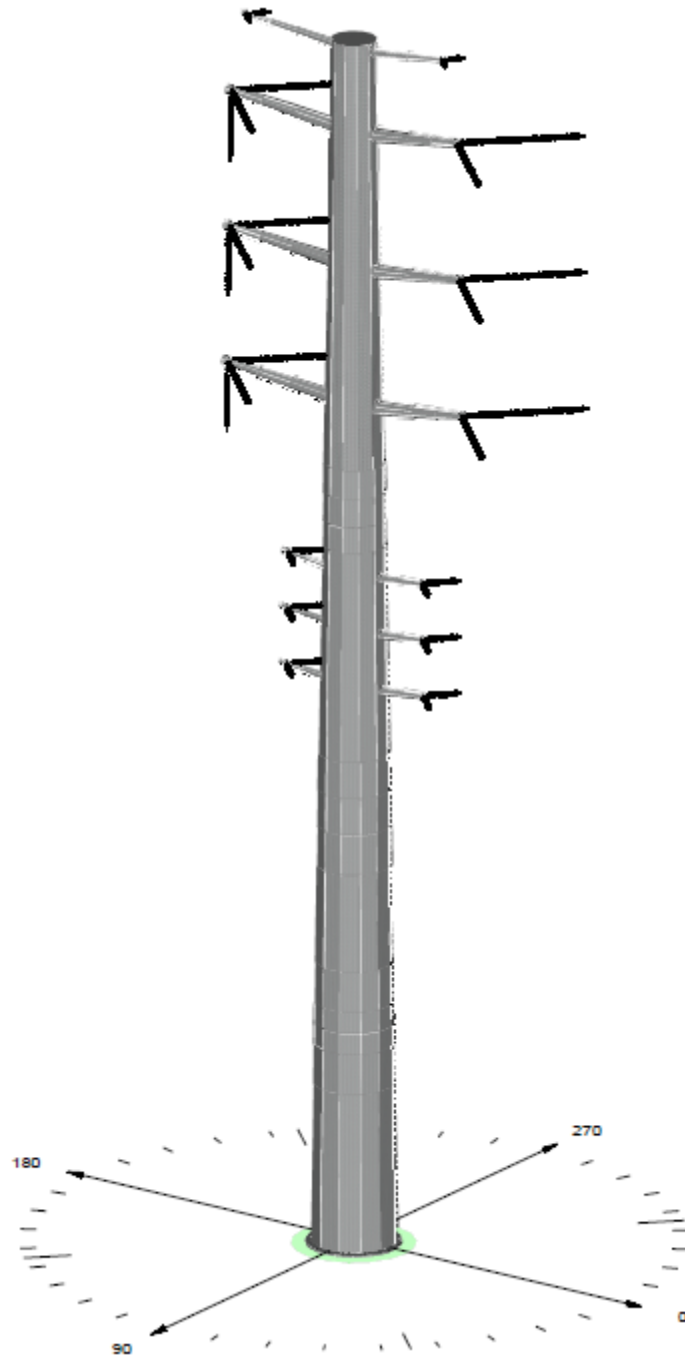
Double-Circuit 230 kV Single-Pole, Braced-Post



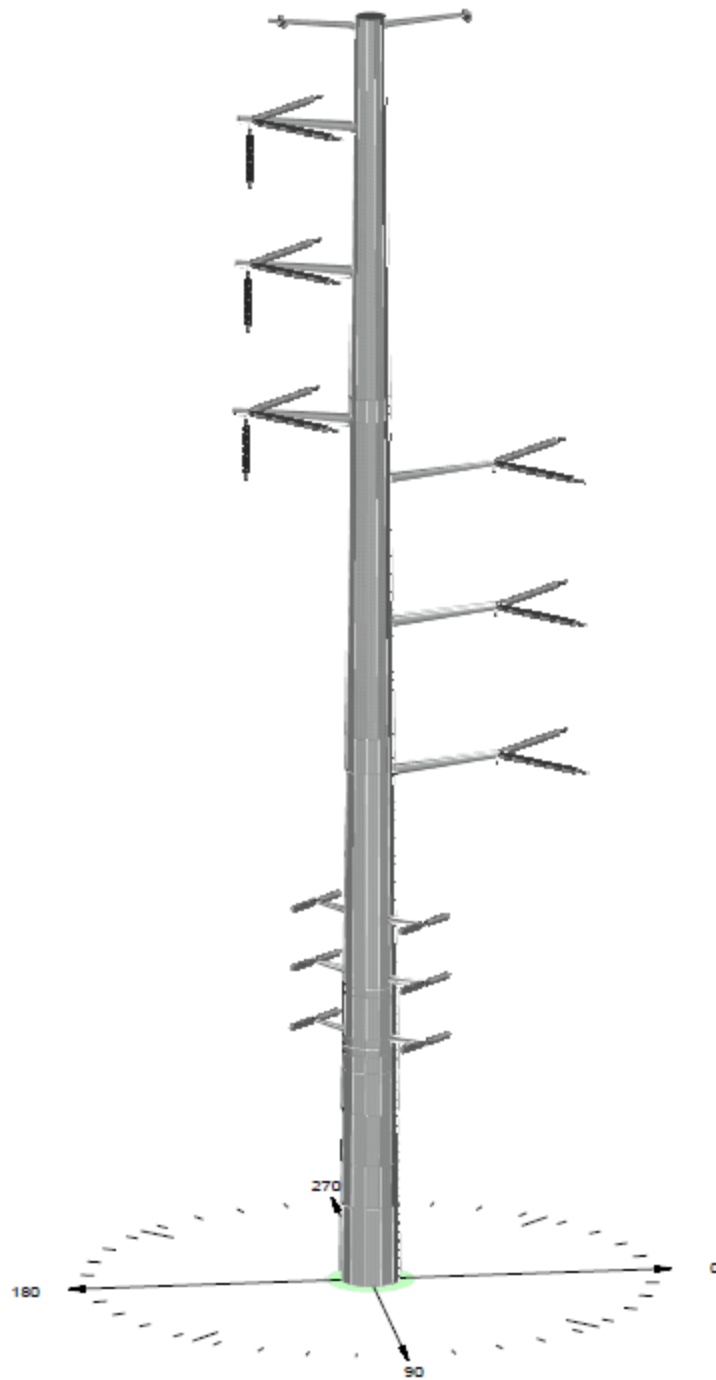
Double-Circuit 230 kV Single-Pole, Davit-Suspension-
Angle



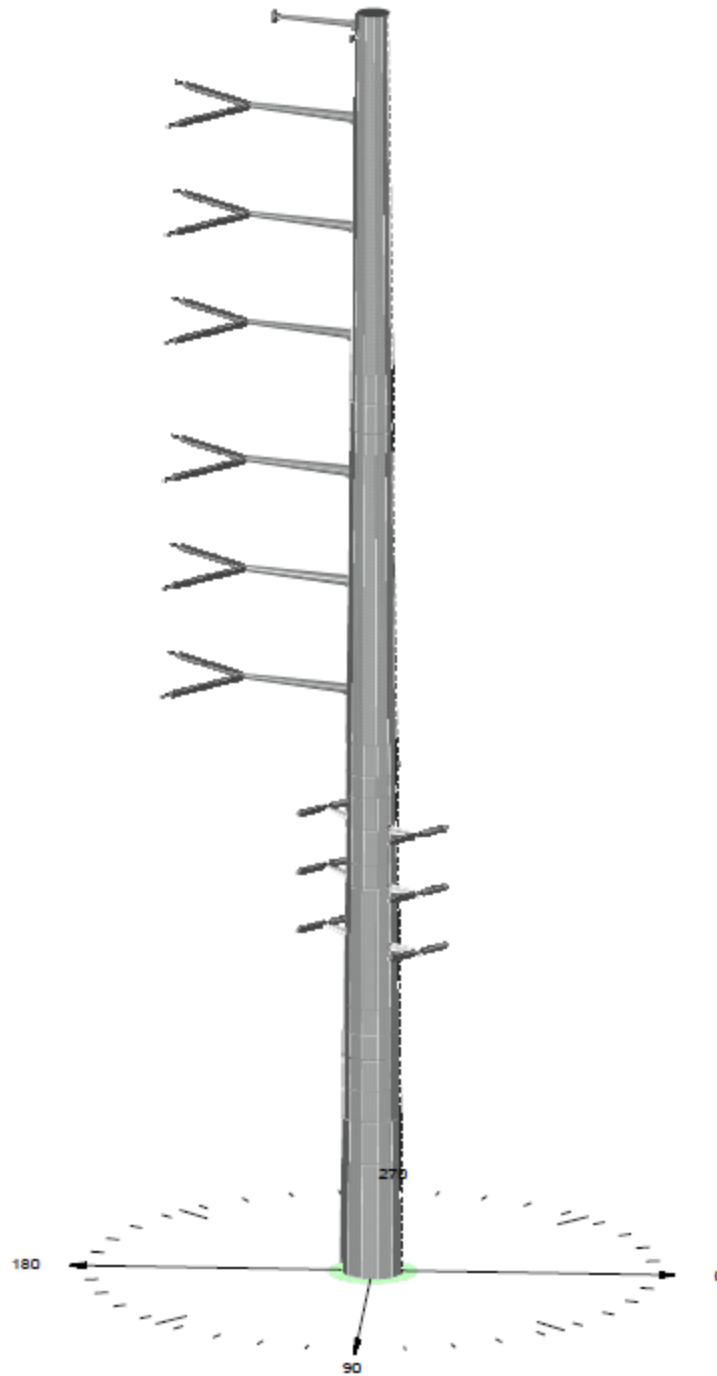
Double-Circuit 230 kV Single-Pole, Davit-Suspension-
Tangent



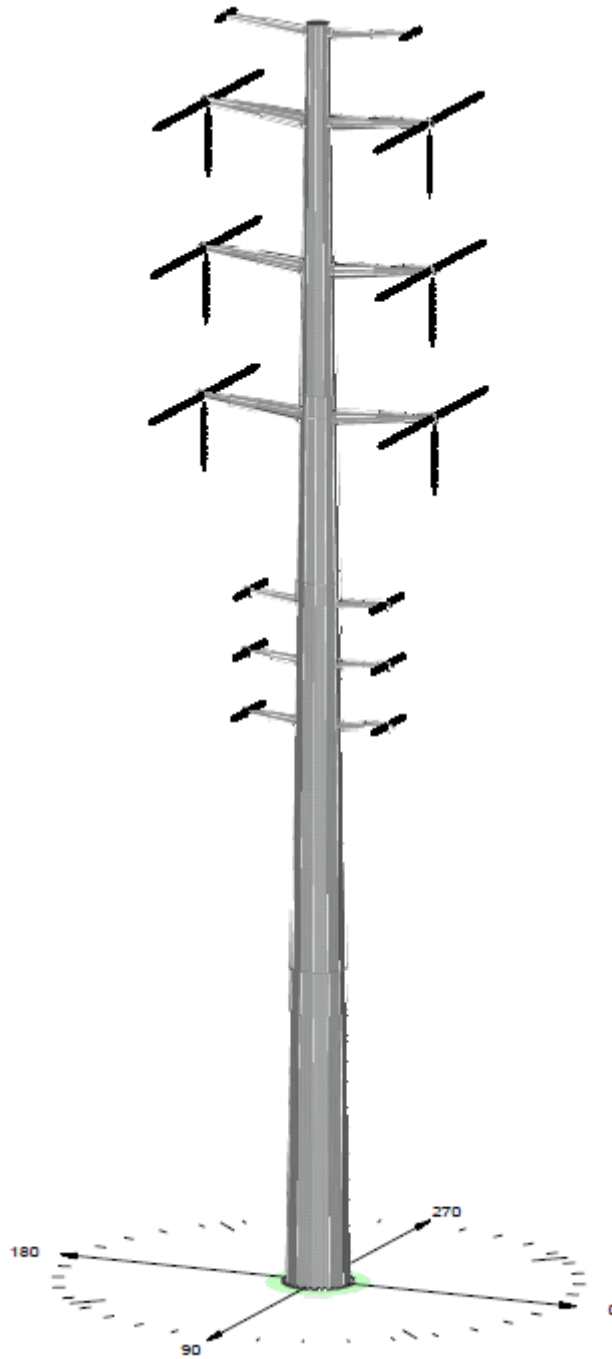
Double-Circuit 230 kV Single-Pole, DE-Davit-Angle



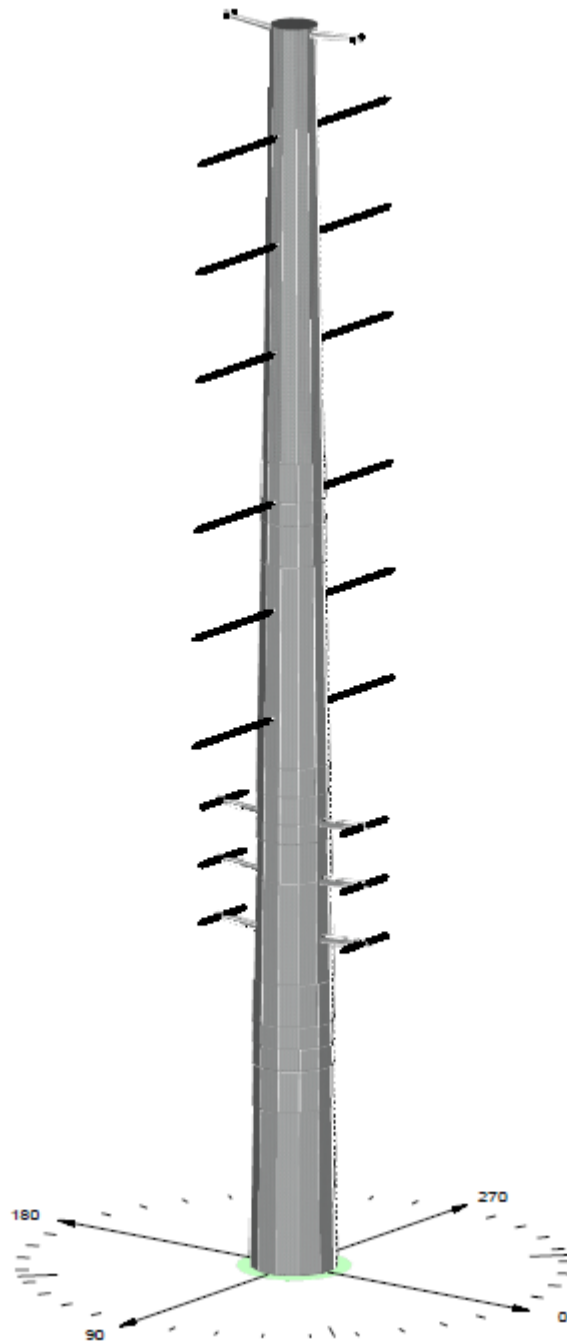
Double-Circuit 230 kV Single-Pole, DE-Davit-Angle-
Vertical-V1



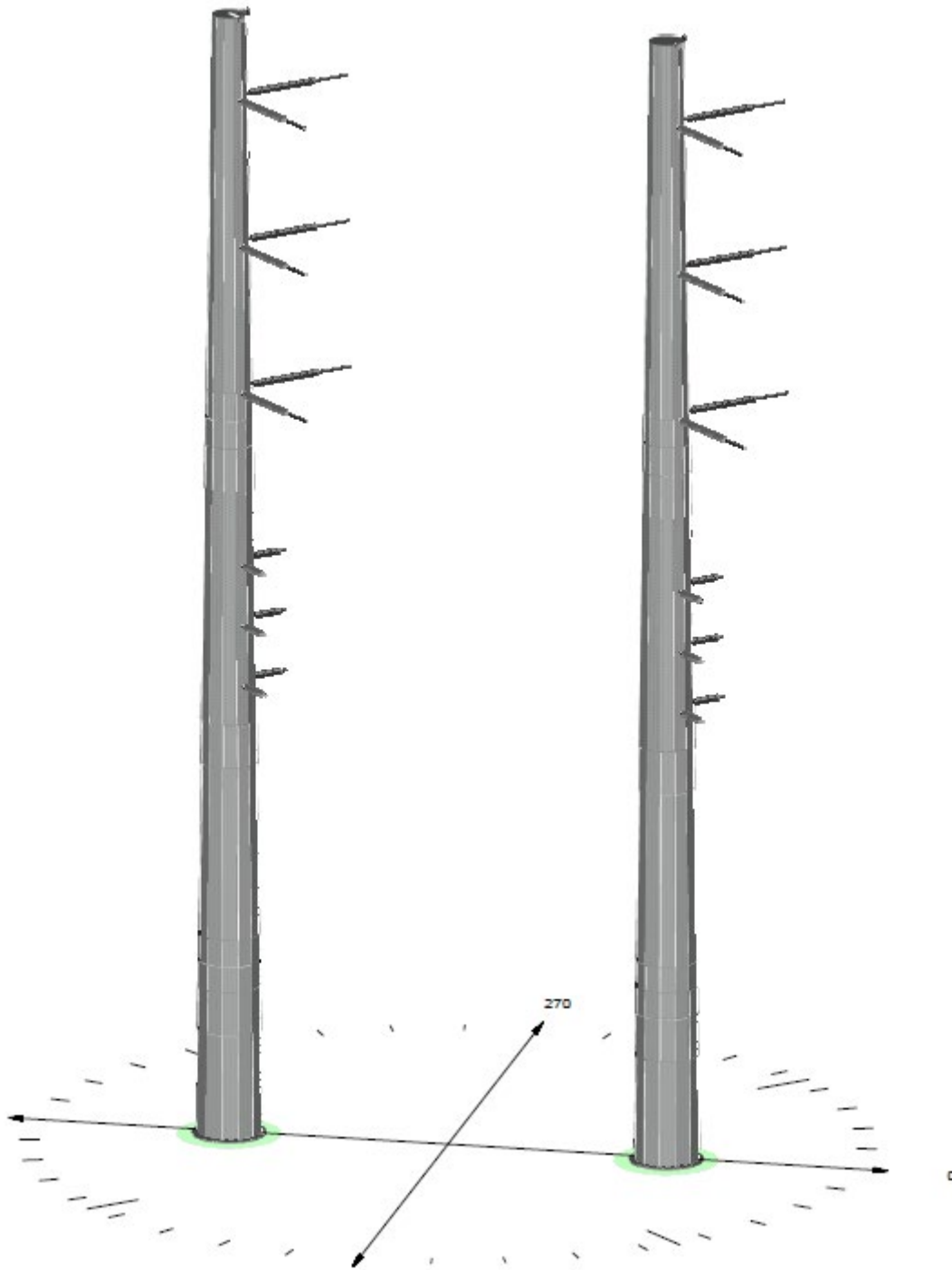
Double-Circuit 230 kV Single-Pole, DE-Davit-Angle-
Vertical-V2



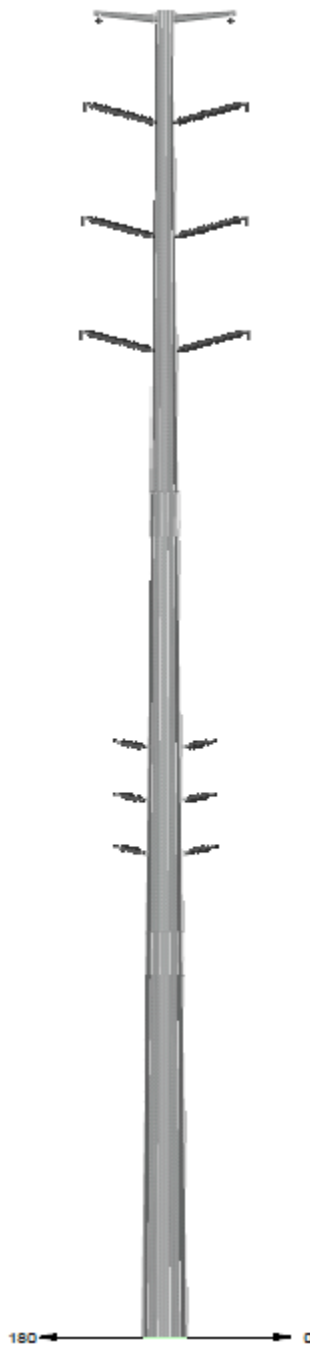
Double-Circuit 230 kV Single-Pole, DE-Davit-Inline



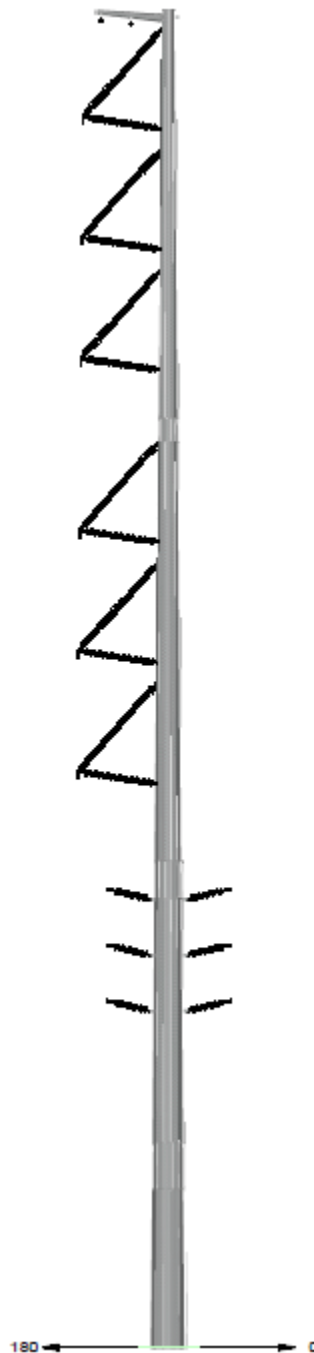
Double-Circuit 230 kV Single-Pole, DE-Vertical



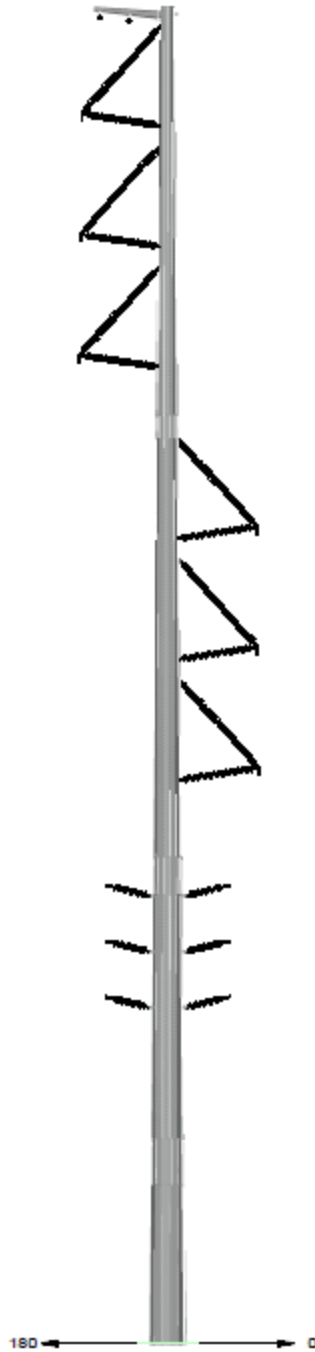
Double-Circuit 230 kV Double-Pole, DE-Vertical



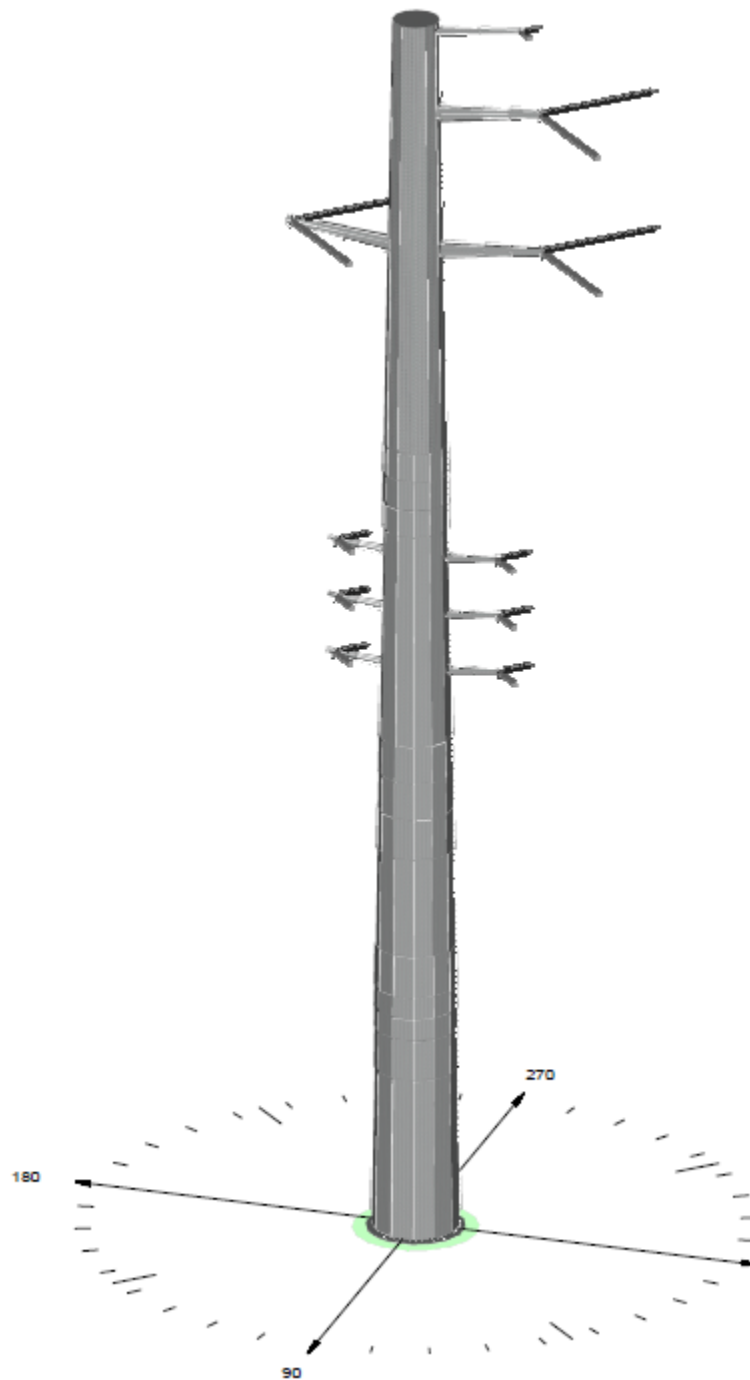
Double-Circuit 230 kV Single-Pole, Post



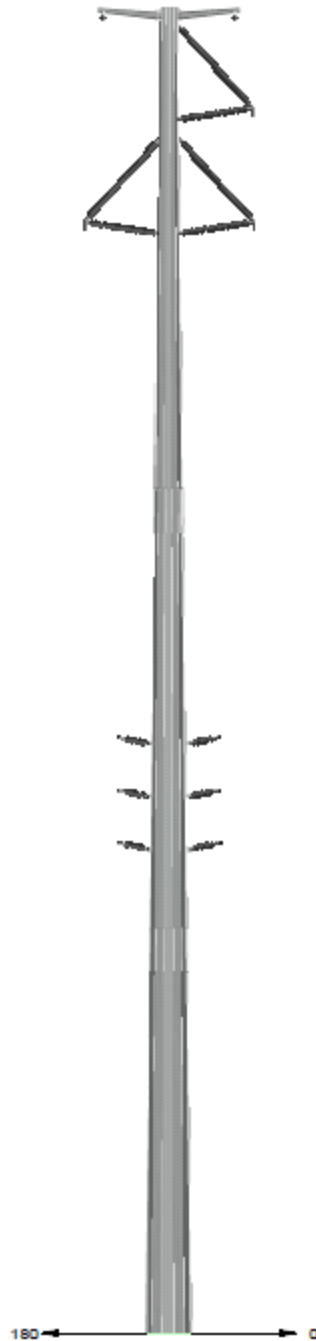
Double-Circuit 230 kV Single-Pole, Vertical-Braced-
Post-V1



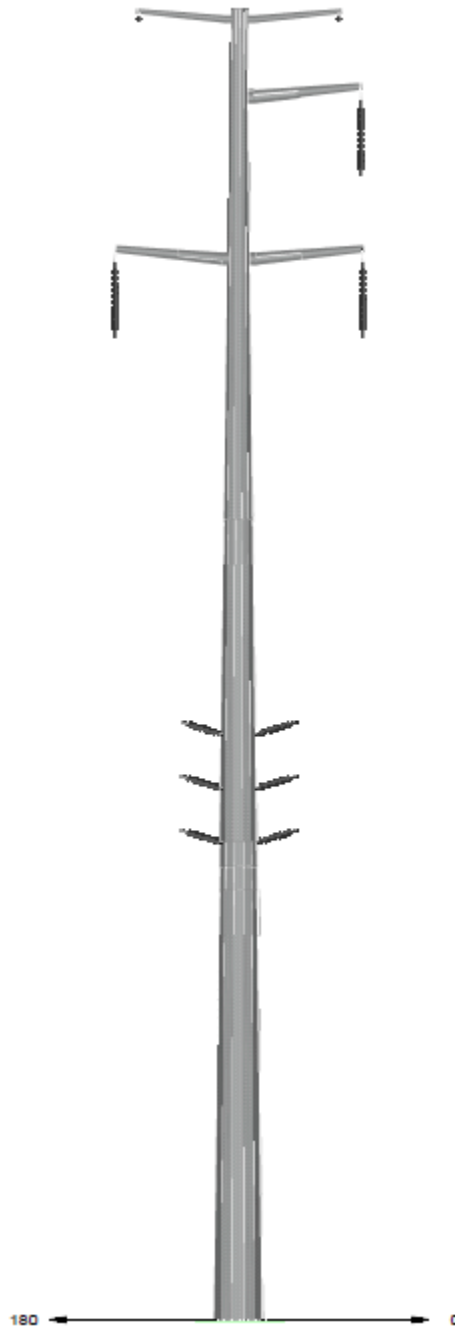
Double-Circuit 230 kV Single-Pole, Vertical-Braced-
Post-V2



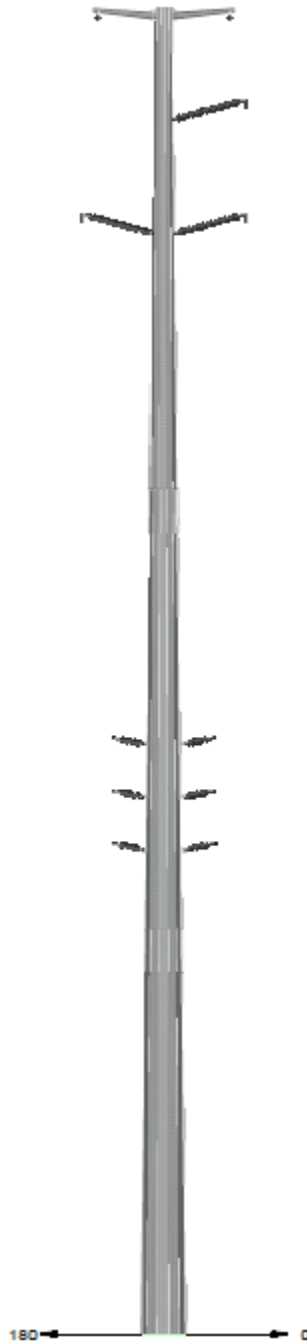
Single-Circuit 230 kV Single-Pole, DE-Delta-Davit



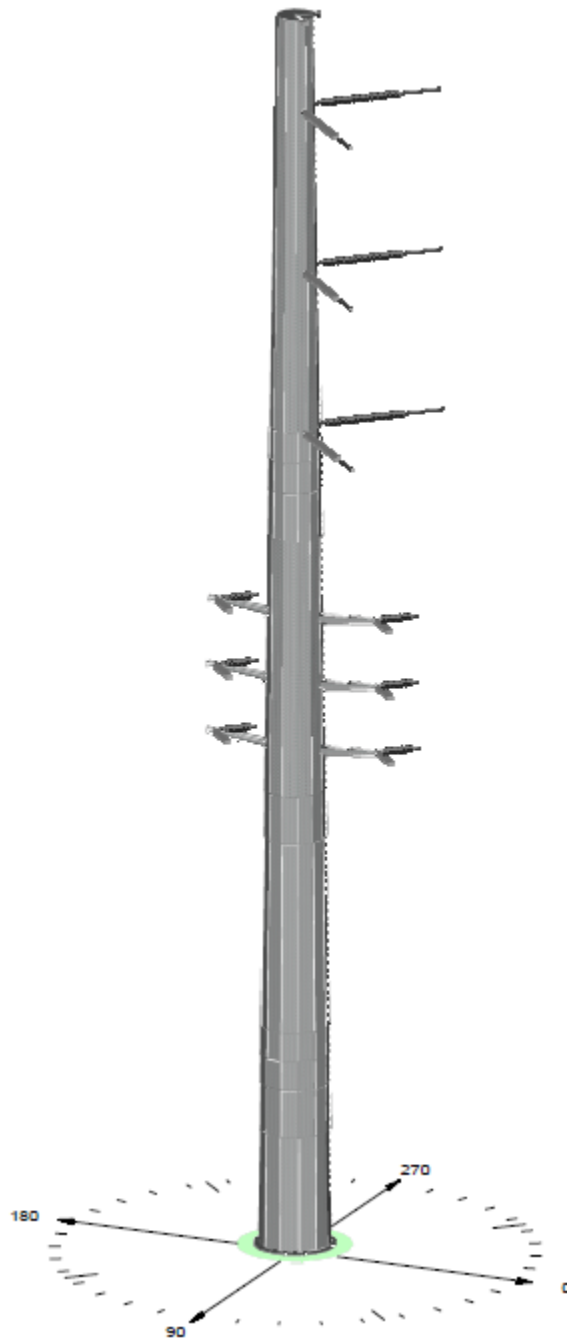
Single-Circuit 230 kV Single-Pole, Delta-Braced-Post



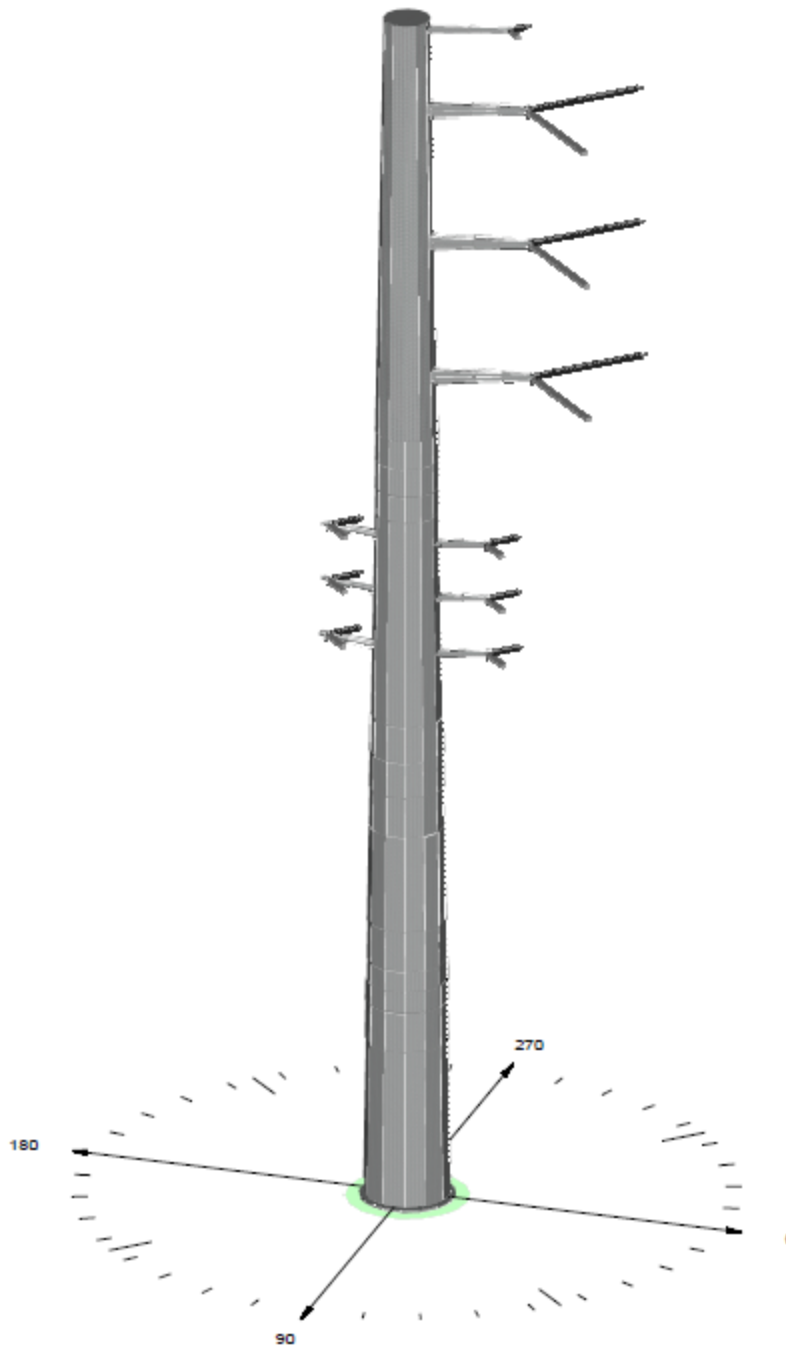
Single-Circuit 230 kV Single-Pole, Delta-Davit-
Suspension



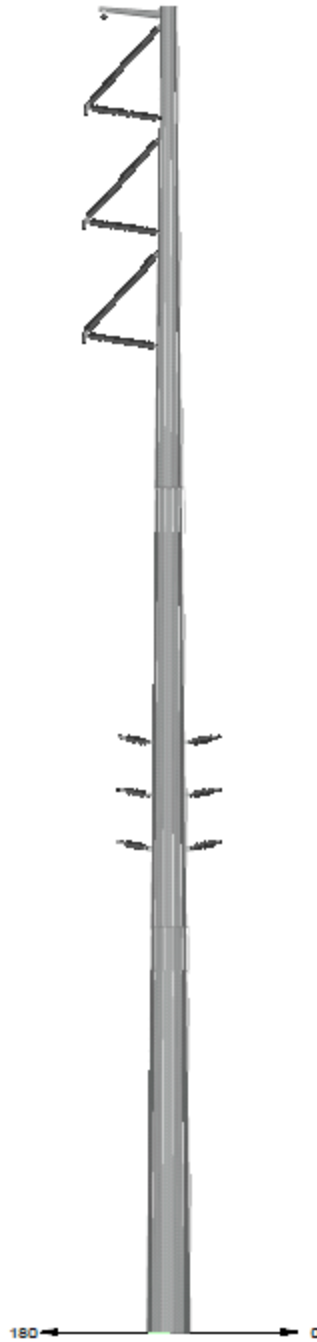
Single-Circuit 230 kV Single-Pole, Delta-Post



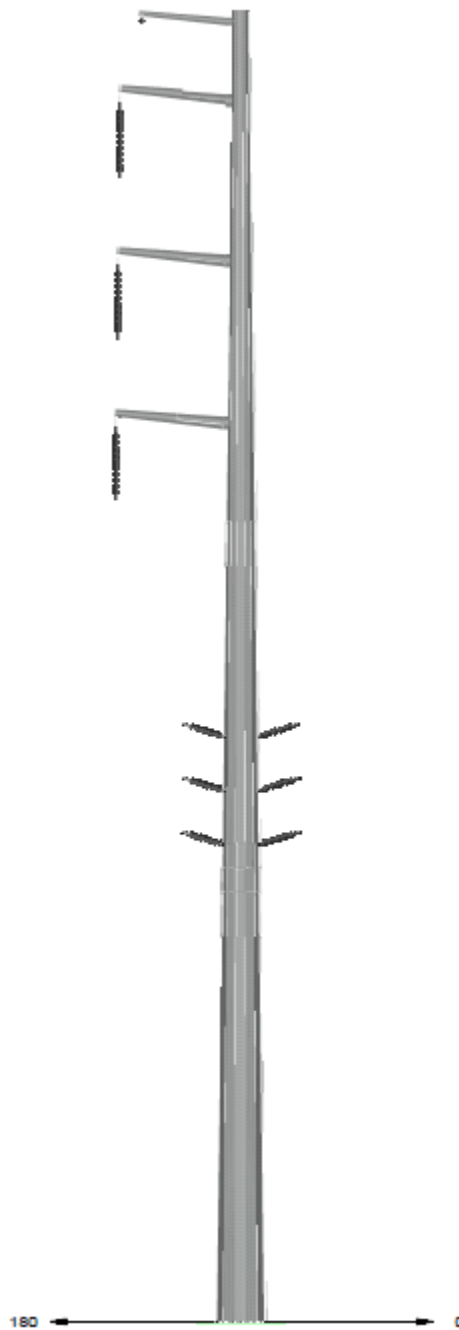
Single-Circuit 230 kV Single-Pole, DE-Vertical



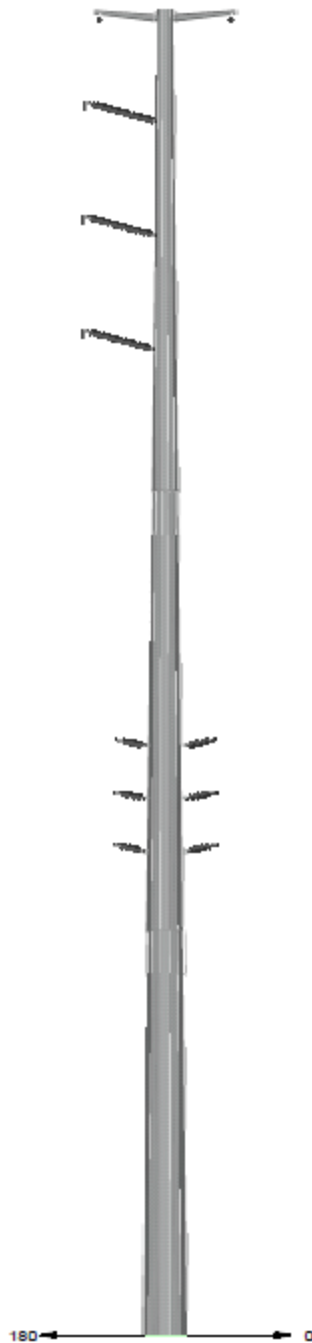
Single-Circuit 230 kV Single-Pole, DE-Vertical-Davit



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



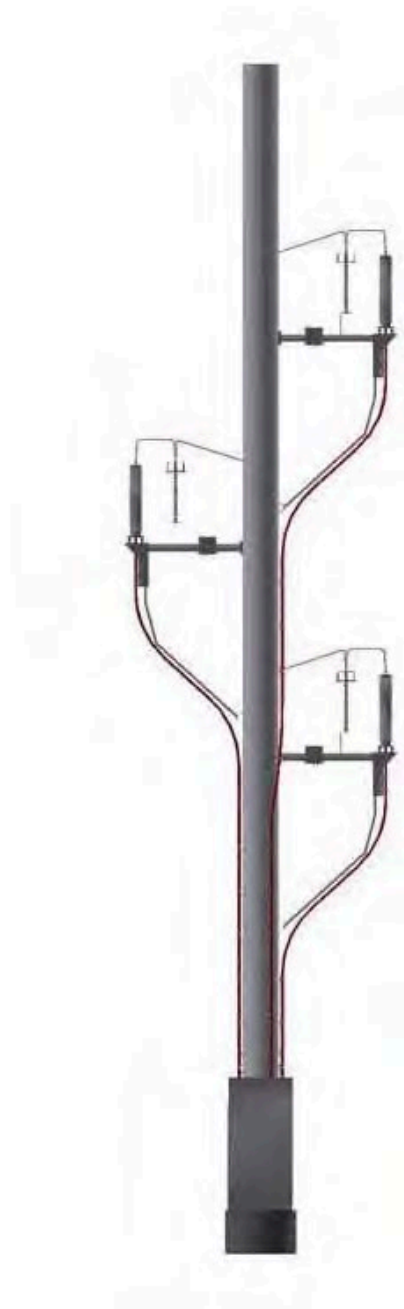
Single-Circuit 230 kV Single-Pole, Vertical-Davit-
Suspension



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



Single Circuit Riser Pole, Two Cables Per Phase



Single Circuit 230 kV Riser Pole, One Cable Per Phase

EXHIBIT H EXISTING PLANS

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

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

Planned Area Developments

Information regarding each existing Planned Area Development (PAD) near the Salt River Project Agricultural Improvement and Power District (SRP) proposed Marigold Transmission Project (Project) was gathered during meetings with and input from Pinal County and meetings with developers and stakeholders. PADs and future expansion plans in the area surrounding the Project components are administered by Pinal County. Included in this exhibit are PADs that are generally defined as proposed developments that have filed an application for a permit or have been permitted but not built or occupied completely. Some planned developments of which SRP is aware also are included.

There are currently no permitted or proposed PADs within the 1-mile buffer of the Project components, but 5 permitted or proposed PADs depicted on **Figure H-1** in close proximity. Four of the PADs are energy projects, with three located Southeast of the Project. Project Midway is a proposed 215-acre data center development, Project Bella is a proposed gas turbine and a battery energy storage system on approximately 350 acres, and Griffin Energy Project is a proposed a solar farm, gas-fueled power plant and battery storage system on 2,685 acres. Northwest of the proposed Project is the Cactus Wren PAD, a 800-megawatt battery project on 40 acres. The I-8 and Stanfield PAD, south of the Project, was created in 2025 to create a large employment and industrial center at the interchange of I-8 and Stanfield Road.

Planned Road Improvements

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) have proposed the building of Interstate 11, a new proposed highway corridor. The Fixing Americas Surface Transportation (FAST) act formally designated I-11 as a proposed transportation route in Arizona that would link Nogales at the Mexican border and extend north towards Phoenix and beyond. The Project site falls entirely in the I-11 corridor study area. The I-11 Selected Alternative corridor crosses east to west through the northern SRP-owned parcels of the Marigold Energy Center, but the Project would be outside of the Selected Alternative Corridor. Currently, the southern Arizona portion of the I-11 project remains in the planning and environmental review phase, with no construction underway.

There is one road improvement planned by ADOT outside of the 1-mile buffer, south of the Project. It is just south of SRP-owned land.

There are no road improvements planned by the Pinal County five-year (2024-2029) Transportation Improvement and Maintenance Program (TIMP) within the 1- mile buffer of the Project.

Potential Effects

There are no planned area developments (PADs) or planned road improvements in the 1-mile buffer of the Project components, so there are no potential effects of the Project.

References

Cactus Wren PAD. Presenting The Case. Accessed 6/2/2026. Located at: <https://www.roselawgroup.com/esvolta-development-wins-pinal-pz-approval-for-battery-facility-with-court-rich-rose-law-groups-director-of-energy-utility-infrastructure-and-the-firms-co-founder-presenting-th/>

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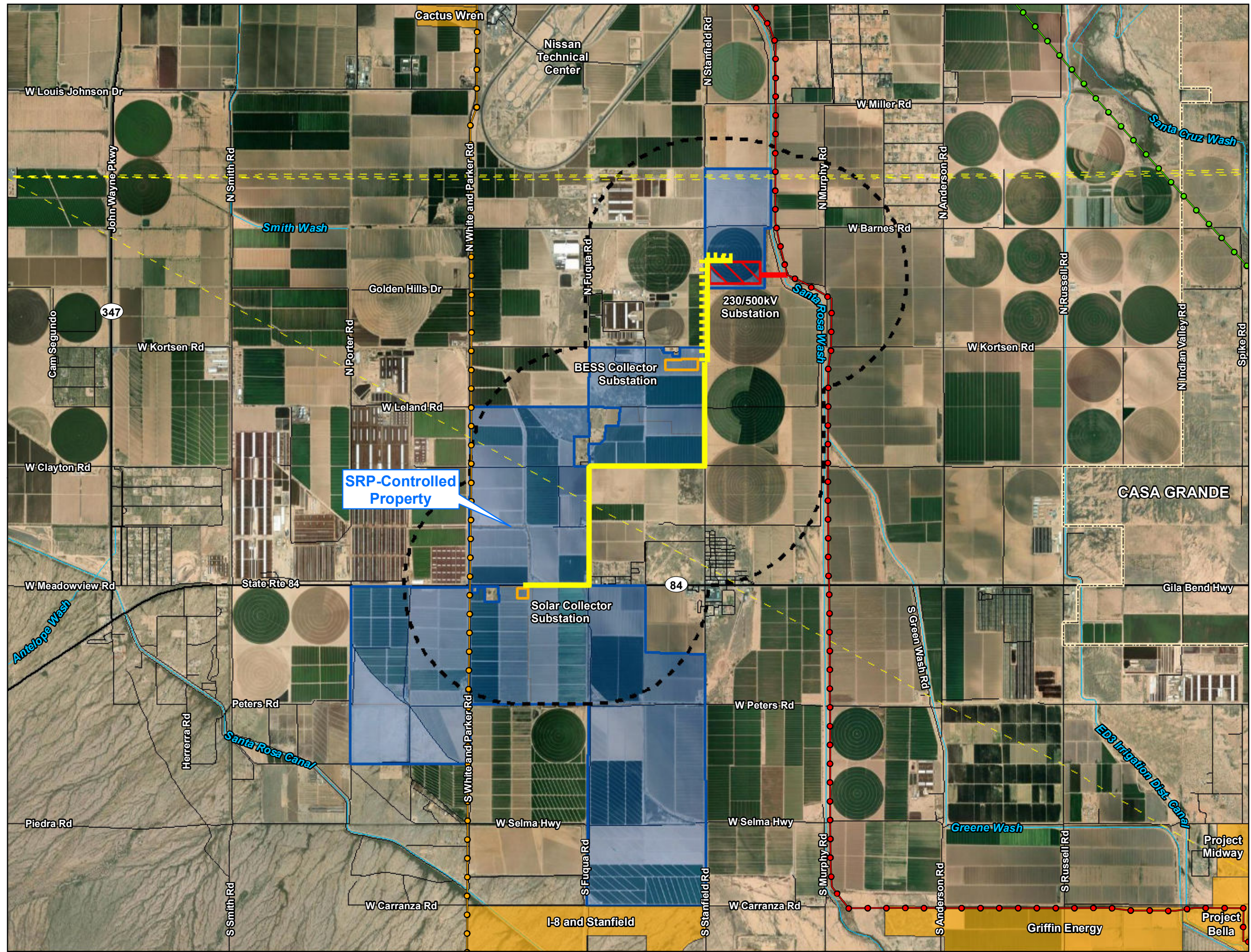
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Pinal County. 2026. Transportation Improvement and Maintenance Program. Accessed 6/2/2026. Located at: <https://www.pinal.gov/847/Transportation-Improvement-Maintenance-P>

Project Bella PAD. 2024. 90 day Plan PDF. Accessed 6/2/2026. Located at: <https://www.projectbellaarizona.com/wp-content/uploads/2024/05/Docketed-Project-Bella-90-Day-Plan-E000034567.pdf>

Project Midway PAD. 2025. Accessed 6/2/2026. Located at: <https://azbex.com/planning-development/pinal-considering-215-acre-data-center-development/>

State of Arizona. 2026. Southcentral district Department of Transportation Projects. Accessed 6/2/2026. Located at: <https://azdot.gov/projects/southcentral-district-projects/Southcentral>



Legend

CEC Jurisdictional Project Components

- Transmission Line 1 – Double Circuit 230 kV
- Transmission Line 2 – Double Circuit 230 kV
- 1-Mile Buffer of Marigold Project Components

Non-Jurisdictional Project Components

- Proposed 500kV Connection
- Collector Substation Location
- 230/500 kV Substation Location
- SRP-Controlled Property

Planned Area Developments

- Planned Area Development

General Features

- 500 kV Transmission Line
- 230 kV Transmission Line
- 115 kV Transmission Line
- Natural Gas Pipeline
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

0 0.25 0.5 0.75 1 Miles

ARIZONA

Phoenix

Florence

Pinal County

Map Extent

SRP

SRP PROJECT MARIGOLD

FIGURE H-1

PLANNED AREA DEVELOPMENTS

Map Extent: Pinal County, AZ

Date: 8.10.26 Author: SJW

EXHIBIT I

NOISE EMISSIONS AND COMMUNICATION INTERFERENCE

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

Describe the anticipated noise emission levels and any interference with communication signals which will emanate from the proposed facilities.

Introduction

A noise study was conducted to determine the potential noise impacts that would result from construction and operation of the proposed Marigold Energy Center (Energy Center). This noise study includes any potential operational noise impacts associated with the Marigold Transmission Project (Project). The analysis was conducted to determine whether facility operations would follow applicable County noise standards and whether Project generated noise would result in a substantial increase over existing ambient conditions at nearby residences.

This noise study provides background information on environmental sound, including descriptions of the sound metrics used throughout the report, applicable noise standards and regulations, the results of the ambient sound measurement program, and an assessment of the potential noise impacts from development and operation. Interference with communication signals is also evaluated.

Existing Sound Levels

The ambient noise in the vicinity of the Energy Center site is typical of a rural agricultural and residential area. To determine reasonable estimates for the existing noise levels in the vicinity of the Project, noise monitoring was conducted at locations in the surrounding area.

To establish the existing noise environment in the Project area, sound level measurements were conducted between February 19 and 20, 2026 at key locations surrounding the proposed Project area. The ambient noise recorded at three measurement locations is representative of the existing ambient noise levels at the nearest sensitive receptors to the proposed Project site. The primary audible noise sources contributing to the ambient sound levels were vehicle traffic from nearby roads, birds chirping, and the hum of existing transmission lines.

Noise-level monitoring was conducted for a 24-hour interval at each location using a Larson Davis Model 831 sound-level meter. This meter satisfies the American National Standards Institute (ANSI) standard for general environmental noise measurement instrumentation. The sound-level meter was located approximately 5 feet above ground and was covered with a Larson Davis windscreen. The sound-level meter was field calibrated with an external calibrator prior to operation.

To evaluate potential noise impacts associated with the proposed Project, modeled operational noise levels were compared to the limits established in the Pinal County Excessive Noise Ordinance, which sets quantitative standards based on zoning classification. Sensitive uses

surrounding the Project site are located within the Residential (60 dBA daytime limit; 55 dBA nighttime limit) and Rural (65 dBA daytime limit; 60 dBA nighttime limit) zoning classifications. Modeled noise levels were also compared to the maximum measured ambient noise conditions to assess whether Project operations would result in a noticeable increase in the existing sound environment. The complete noise technical report for the Project, titled *Noise Study - Marigold Energy Center Project* and dated March 2026, is included as **Exhibit I-1**. Please refer to **Exhibit I-1** for a complete list of all monitoring results at the short-term and long-term monitoring sites.

Noise Impacts from Proposed Project

Noise levels resulting from construction and operation of the Project were evaluated with respect to noise guidelines and policies established by Pinal County, Arizona, and federal agencies. No federal laws, regulations, or standards that directly affect this Project with respect to noise were identified. However, there are guidelines at the federal level that direct the consideration of a broad range of noise issues. For example, the U.S. Environmental Protection Agency (EPA) has published a guideline that specifically addresses issues of community noise (EPA 1974). This guideline, commonly referred to as the "levels document," recommends a threshold for noise levels affecting residential land use of Ldn <55 dBA for exterior levels. Additionally, the Department of Housing and Urban Developments Noise Guidebook, Chapter 2, Section 51.101(a)(8), proposes that exterior areas of frequent human use follow the EPAs 55 Ldn threshold. However, the same Section indicates that a noise level of 65 dBA Ldn could be considered acceptable (HUD 2009).

The Pinal County Excessive Noise Ordinance (Section 050306-ENO) prescribes noise limits along property boundaries according to the land use category as shown in **Table I-1**. The Pinal County Municipal Ordinance applies to unincorporated areas of the county. The Project is located in unincorporated land in Pinal County. As a result, the requirements contained within this ordinance would be potentially applicable to the Project.

Table I-1. Limiting Sound Levels for Land Use Districts

Zoning District Classifications	Leq Limits, dBA
Residential: CR-1A, CR-1, CR-2, CR-3, CR-4, CR-5, OS, MH, RV, MHP, PM/RVP, TR	60 dBA (7 a.m.-8 p.m.) 55 dBA (8 p.m. – 7 a.m.)
Commercial or Business: CB-1, CB-2	65 dBA (7 a.m. – 10 p.m.) 60 dBA (10 p.m. – 7 a.m.)
Industrial: CI-B, CI-1, CI-2	70 dBA (7 a.m. – 10 p.m.) 65 dBA (10 p.m. – 7 a.m.)
Rural: CAR, SR, SR-1, SH, GR, GR-5, GR-10	65 dBA (7 a.m. – 9 p.m.) 60 dBA (9 p.m. – 7 a.m.)

Source: Pinal County (2011)

Note: The Leq limits specified are Leq for a two-minute time interval. Partial Leq levels may be obtained as necessary to assure an accurate indication of the representative sound environment for the site.

Sound projected from property within one zoning district into property within another zoning district of a lesser sound level limit shall not exceed such lesser sound level limit.

Neighboring properties are zoned as General Rural (GR), residential designations such as CR-3 (Single Residence Zone), and industrial designations such as CB-2 (General Business Zone).

The Pinal County ordinance does not limit noise from construction, but does limit the allowed operation times for construction to occur to the following:

- Concrete Work - 5:00 a.m. to 7:00 p.m. from April 15 to October 15 and 6:00 a.m. to 7:00 p.m. from October 16 to April 14.
- Other Types of Construction - 6:00 a.m. to 7:00 p.m. from April 15 to October 15 and 7:00 a.m. to 7:00 p.m. from October 16 to April 14.
- Construction and repair work in non-residential areas. not within 500 feet of a residential property, shall not begin prior to 5:00 a.m. and must stop by 7:00 p.m. or at such other times as authorized by permit.
- Weekends and Holidays Excluded - Construction or repair work shall be limited to 7:00 a.m. to 7:00 p.m. and concrete pouring shall be limited to 6:00 a.m. to 7:00 p.m.

Construction outside the time periods specified above is allowed if an appropriate permit has been obtained beforehand from the county.

Construction

Typical construction activities at the Project site would result in a transient increase in the ambient noise level resulting from the operation of construction equipment, as the construction of the Project is expected to occur over a 2-year timeframe. The increase in noise level would be proportional to the distance to the noise source. The extent of the noise effects would depend on the type of construction activity, duration of the construction activity, and the distance between the noise source and receiver. It is anticipated that construction activities will primarily take place during daylight hours (dawn to dusk) up to six days a week (Monday-Saturday).

Operations

To determine the potential noise impact from the expected operation of the proposed Project, detailed noise modeling was conducted. **Exhibit I-1** provides detailed information on the inputs used to populate the refined model.

Operational noise levels related to the proposed Project were calculated with the noise model SoundPLAN, a commercially available software that produces computer simulations of noise

propagation from sources. The SoundPLAN modeling software accounts for large differences in topography, and the presence of intervening structures or landscaping that would block a direct line of sight between operation activities from the proposed Project site and nearby sensitive receptors. The operational noise levels were calculated for sensitive-receptor locations using SoundPLAN. To quantify events related to the noise sources generated by the proposed Project, the following assumptions were used.

To evaluate potential noise impacts associated with the proposed Project, modeled operational noise levels were compared to the limits established in the Pinal County Excessive Noise Ordinance, which sets quantitative standards based on zoning classification. Sensitive uses surrounding the Project site are located within the Residential (60 dBA daytime limit; 55 dBA nighttime limit) and Rural (65 dBA daytime limit; 60 dBA nighttime limit) zoning classifications. Modeled noise levels were also compared to the maximum measured ambient noise conditions to assess whether Project operations would result in a noticeable increase in the existing sound environment.

Based on this comparison, modeled noise levels at the nearest sensitive receptors remain below the County's daytime limit and nighttime limit for the Rural zoning designation and the more restrictive daytime limit and nighttime limit for the Residential zoning district. Furthermore, the comparison to existing ambient conditions indicates that Project generated noise would result in a minimal increase above ambient of approximately 0.1 dBA, which is well below perceptible levels and would not result in meaningful changes to the existing sound environment. As such, operational impacts from the proposed facility would not be considered significant.

Corona Noise

Audible noise associated with transmission lines as a result of corona discharge is a function of line voltage. Operational noise from overhead transmission lines is primarily associated with corona discharge, which may produce low-level crackling, hissing, or buzzing sounds under certain atmospheric conditions, particularly during periods of high humidity or precipitation.

The Project would connect the proposed solar generation and Battery Energy Storage System (BESS) to the proposed Marigold Substation with two double-circuit 230 kV transmission lines. It is not expected that new corona noise impacts would be experienced at any residential receptor.

Communication Interference

Transmission line corona effects associated with the proposed Project could interfere with amplitude modulation (AM) radios in vehicles, but only when those vehicles travel under or near the line. Additionally, only AM receivers located very near to transmission lines that are tuned to a weak station have the potential to be affected by radio interference. AM radio frequency interference typically dissipates rapidly with increasing distance from the line. Frequency modulation (FM) radio is rarely affected by corona because corona-generated radio frequency noise currents decrease in magnitude with increasing frequency.

Television reception in local homes is not expected to change as a result of the proposed Project. It is logical to assume that if residents at any of these locations are not currently experiencing

interference from the existing lines, they will not experience interference from the more distant line.

Rural residents are more likely to be receiving television by satellite than broadcast in any case. Satellite television frequencies are higher than transmission line frequencies and are not affected by transmission line operation or corona. Cable television service is equally unaffected.

Similarly, wireless computer networks such as Wi-Fi or wireless local area networks operate at high frequencies in the tens to hundreds of megahertz (MHz) or gigahertz (GHz) and use digital coding of the signals. As a result of the high frequencies used by these devices, modulation and processing techniques, effects from interference are unlikely.

Transmission lines do not interfere with cellular phone tower operations or microwave communication paths. This is demonstrated by the fact that cellular phone antennae and microwave receivers are commonly mounted on transmission structures and receive the benefits of the additional height provided by the structures.

Conclusions

Predicted Project construction noise levels may temporarily exceed 55 dBA, but activities causing these temporary elevated noise levels will operate during allowable construction process hours as presented in Section 050306-ENO of the Pinal County Municipal Ordinance or will seek a permit, if necessary.

The noise impact assessment indicated that noise generated by the Project will not be higher than 55 dBA Ldn at the nearest noise receptors. Additionally, though not applicable to the Project, predicted noise levels at all property boundaries will be compliant with the Pinal County Excessive Noise Ordinance.

Audible noise from transmission lines primarily occurs during foul weather conditions. Due to the distance of the small section of new transmission line from receptors, and the proximity of receptors to existing transmission lines, noise above existing ambient levels is not expected to occur at potential receptors. No objectionable noise and/or interference with radio signals is anticipated from the proposed Project.

References

Pinal County. 2011. *Pinal County Excessive Noise Ordinance*. Accessed April 2026. Available at: <https://www.pinal.gov/DocumentCenter/View/7479/Noise-Ordinance-PDF>

EXHIBIT I-1
OPERATIONAL NOISE STUDY

NOISE STUDY

MARIGOLD ENERGY CENTER PROJECT

Pinal County, Arizona

PREPARED BY:



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MARCH 2026

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1.0	Noise Monitoring Data Sheets
2.0	SoundPLAN Output Sheets

A. EXECUTIVE SUMMARY

This *Noise Study* evaluates potential operational noise impacts associated with the proposed Marigold Energy Center. The analysis was conducted to determine whether facility operations would comply with applicable County noise standards and whether Project generated noise would result in a substantial increase over existing ambient conditions at nearby residences.

Modeled operational noise levels were compared directly to the quantitative limits established in the Pinal County Excessive Noise Ordinance. Surrounding sensitive land uses are located within Rural and Residential zoning districts, which establish exterior noise limits of 65 dBA daytime and 60 dBA nighttime for Rural areas, and 60 dBA daytime and 55 dBA nighttime for Residential areas.

Modeled noise levels at all evaluated receptors remain below the applicable daytime and nighttime standards for both Rural and Residential zoning classifications. In addition, when compared to measured maximum ambient conditions, Project generated noise would result in a minimal increase of approximately 0.1 dBA at the nearest residences. Increases of this magnitude are well below the level of human perceptibility and would not result in a meaningful change to the existing sound environment.

Based on the analysis, operational noise from the proposed facility would comply with applicable County standards and would not result in a significant noise impact.

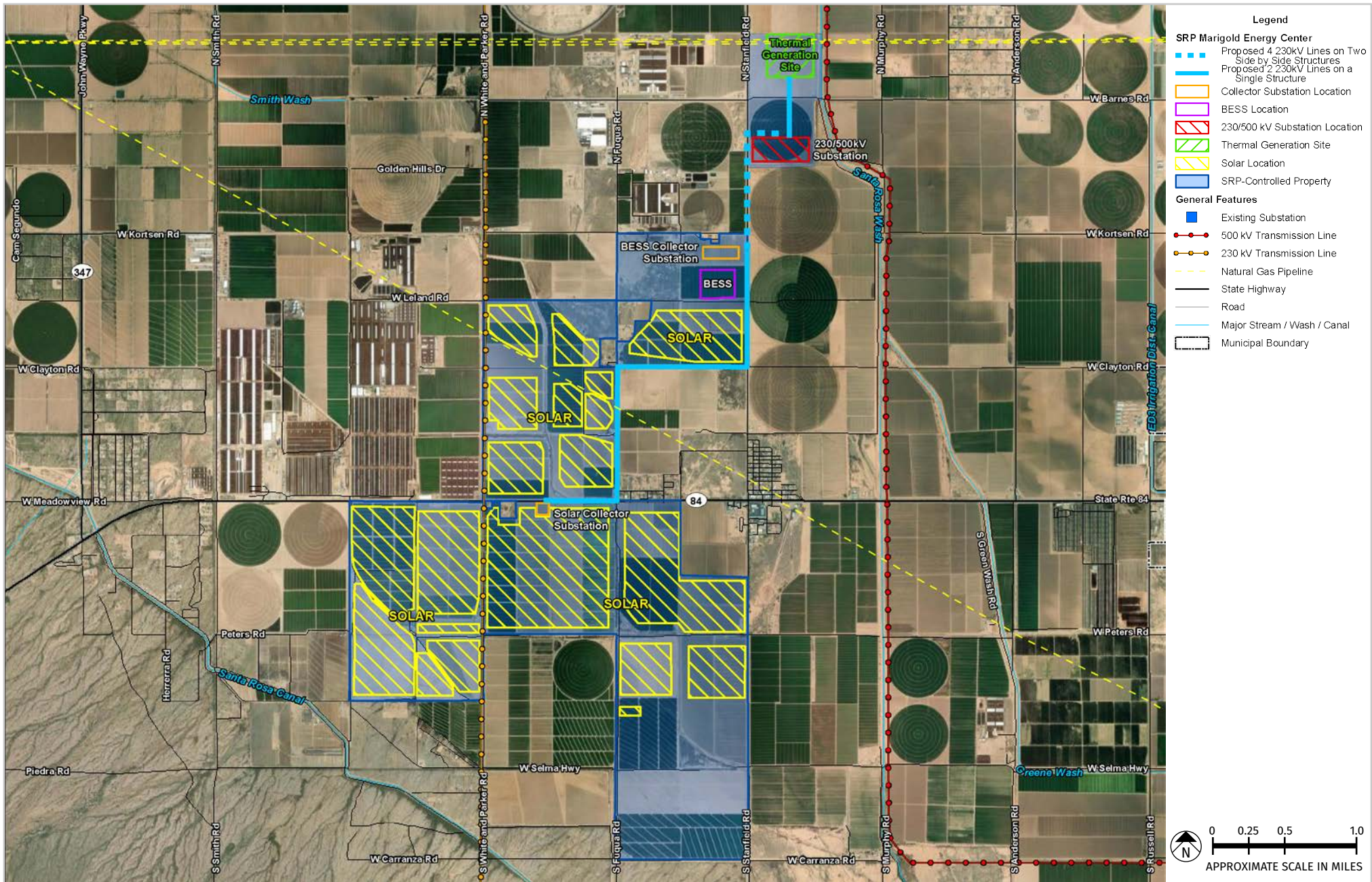
B. PROJECT DESCRIPTION

Salt River Project Agricultural Improvement and Power District (SRP) is planning the proposed Marigold Energy Center, a mixed generation and energy storage facility intended to address near term energy and capacity needs in central Arizona.

Based on currently available information, the Project is anticipated to include a combination of electrical generation, battery energy storage system (BESS), and transmission infrastructure. Planned components are expected to consist of a new 230 kilovolt (kV)/500 kV substation, approximately four miles of new 230 kV transmission lines, up to 600 megawatts (MW) of solar photovoltaic generation, approximately 400 MW of battery energy storage, and up to 675 MW of gas fired generation.

The Project is designed to provide flexible and dispatchable generating capacity to support increasing electricity demand associated with continued growth in Maricopa and Pinal counties. The mix of solar generation, battery energy storage, and gas fired generation would enhance grid reliability and support the integration of intermittent renewable energy resources.

For purposes of this noise study, the Project description reflects currently available conceptual information. Specific equipment models, operating schedules, and final facility layout may be refined during subsequent design phases and will be evaluated using reasonable and conservative assumptions, as appropriate, to characterize potential operational noise levels.



SOURCE: SRP; ADOT; BLM; ESRI; Pinal Co. - 2026.

FIGURE 1

C. EXISTING CONDITIONS

Ambient Noise Levels

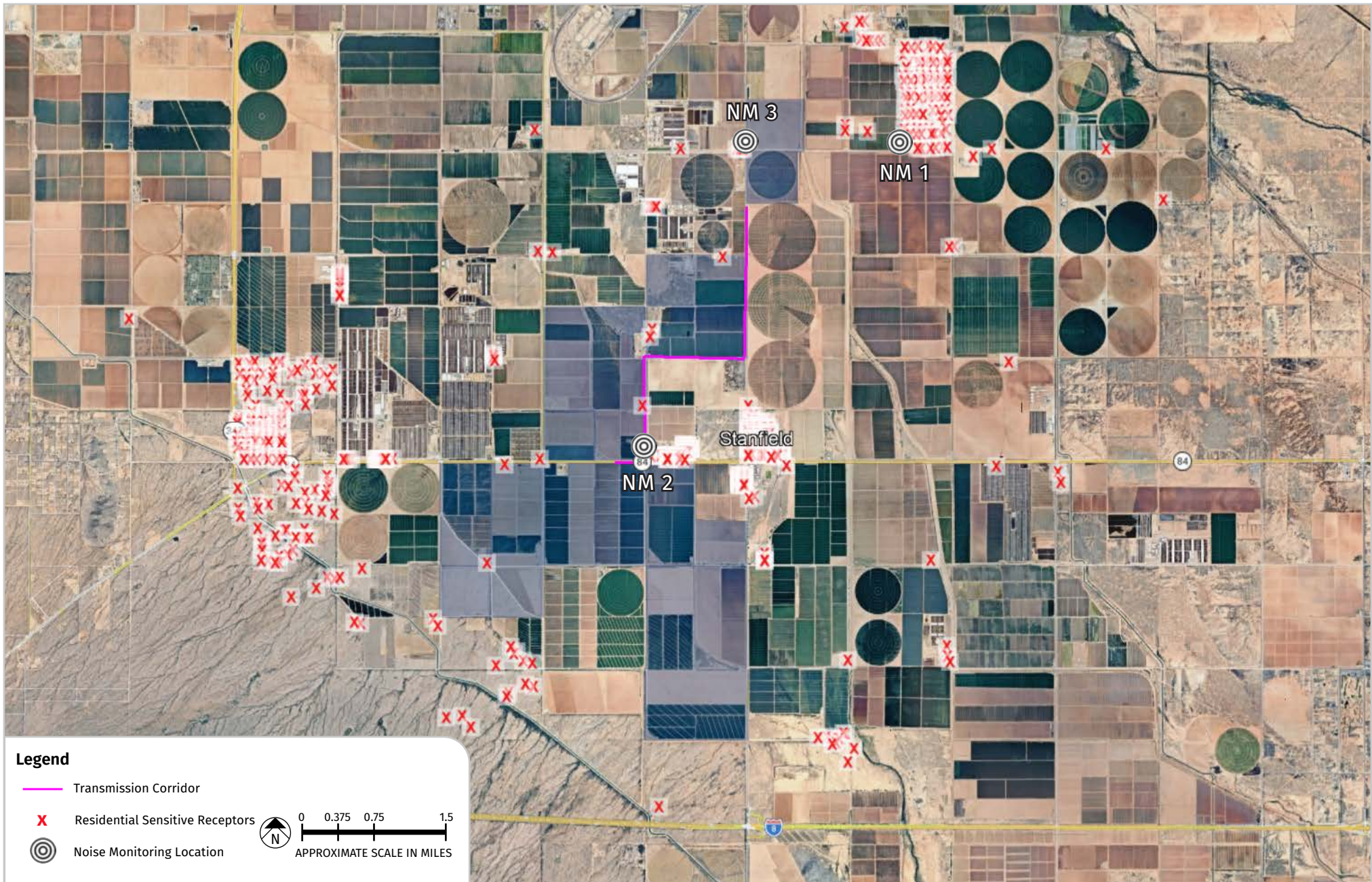
To establish the existing noise environment in the Project area, sound level measurements were conducted between February 19 and 20, 2026 at key locations surrounding Proposed Project area (refer to **Figure 2: Noise Measurement Locations and Sensitive Receptor Map**).

The ambient noise recorded at all three (3) measurement locations is representative of the existing ambient noise levels at the nearest sensitive receptors to the Proposed Project site. The primary audible noise sources contributing to the ambient sound levels were vehicle traffic from nearby roads, birds chirping, and the hum of existing transmission lines.

A summary of the noise levels measured near the Proposed Project site are presented in **Table 1: Ambient Noise Measurements**. As shown, daytime average noise level measurement ranged from 51.4 dBA at the corner of W. Barnes Road and N. Stanfield Road (NM3) to 62.7 dBA along N. Pala Road, north of W. Barnes Road and south of W. Loma Road (NM1). Additionally, nighttime average noise level measurements ranged from 51.4 dBA (NM3) to 59.8 dBA (NM1).

TABLE 1: AMBIENT NOISE MEASUREMENTS						
Location	Description	Measured Noise Levels, dBA				24-hour Ldn
		Daytime (Average)	Nighttime (Average)	Minimum (Hourly)	Maximum (Hourly)	
NM1	Along N. Pala Road, north of W. Barnes Road and south of W. Loma Road	62.7	59.8	43.4	66.8	66.7
NM2	Corner of W. Apache Drive and N. Fuqua Road	59.8	54.7	48.8	63.6	62.3
NM3	Corner of W. Barnes Road and N. Stanfield Road	51.4	51.4	34.3	57.7	57.8

Source: Refer to **Appendix 1.0: Noise Monitoring Worksheets**.



SOURCE: Google Earth - 2026.

FIGURE 2

D. APPLICABLE REGULATIONS

The Pinal County Excessive Noise Ordinance applies to all unincorporated areas of the county and establishes maximum allowable noise levels based on land use zoning. It is intended to protect public health and welfare by prohibiting excessive noise, defined as sound that exceeds thresholds specified in Section 6.0 of the ordinance.

Noise limits are enforced through property-line measurements using A-weighted sound levels (dBA) over a two-minute equivalent sound level (Leq) period. These limits vary by zoning designation and time of day. **Table 2: Limiting Sound Levels for Land Use Districts** summarizes the applicable thresholds. The proposed project site is located within the Residential, Industrial and Rural zoning district classifications.

Pursuant to Section 9.0(l) of the ordinance, “*power plant equipment during normal operation*” is explicitly exempt from the sound level limits described above. Therefore, the proposed 525 MW power generation facility, when operating as designed, is not subject to the decibel thresholds of **Table 2**. This exemption acknowledges the functional necessity and regional importance of utility-scale energy infrastructure. Nonetheless, acoustic modeling is provided in this study to quantify operational sound levels and to ensure consistency with broader environmental planning expectations.

TABLE 2: LIMITING SOUND LEVELS FOR LAND USE DISTRICTS		
Zoning District Classification	Daytime Limit	Nighttime Limit
Residential (CR-1A, CR-1, CR-2, CR-3, CR-4, CR-5, OS, MH, RV, MHP, PM/RVP, TR)	60 dBA (7am–8pm)	55 dBA (8pm–7am)
Commercial/Business (CB-1, CB-2)	65 dBA (7am–10pm)	60 dBA (10pm–7am)
Industrial (CI-B, CI-1, CI-2)	70 dBA (7am–10pm)	65 dBA (10pm–7am)
Rural (CAR, SR, SR-1, SH, GR, GR-5, GR-10)	65 dBA (7am–9pm)	60 dBA (9pm–7am)

Notes: dBA = A-weighted decibels.

Sound projected from property within one zoning district into property within another zoning district of a lesser sound level limit shall not exceed such lesser sound level limit.

E. METHODOLOGY

Ambient Noise Measurements

Noise-level monitoring was conducted between February 19 and 20, 2026 at three (3) locations within the Project area vicinity, as shown in **Figure 2**. Noise-level monitoring was conducted for a 24-hour interval at each location using a Larson Davis Model 831 sound-level meter. This meter satisfies the American National Standards Institute (ANSI) standard for general environmental noise measurement instrumentation. The ANSI specifies several types of sound-level meters according to their precision. Types 1, 2, and 3 are referred to as “precision,” “general-purpose,” and “survey” meters, respectively. Most measurements carefully taken with a Type 1 sound-level meter will have a margin of error not exceeding 1 dB.

The Larson Davis Model 831 is a Type 1 precision sound-level meter. This meter meets all requirements of ANSI S1.4-1983 and ANSI1.43-1997 Type 1 standards, as well as International Electrotechnical Commission (IEC) IEC61672-1 Ed. 1.0, IEC60651 Ed 1.2, and IEC60804 Type 1, Group X standards. The sound-level meter was located approximately 5 feet above ground and was covered with a Larson Davis windscreen. The sound-level meter was field calibrated with an external calibrator prior to operation.

Operational Noise

Operational noise levels related to the Proposed Project were calculated with the noise model SoundPLAN, a commercially available software that produces computer simulations of noise propagation from sources. The SoundPLAN modeling software accounts for large differences in topography, and the presence of intervening structures or landscaping that would block a direct line of sight between operation activities from the proposed Project Site and nearby sensitive receptors. The operational noise levels were calculated for sensitive-receptor locations using SoundPLAN. To quantify events related to the noise sources generated by the proposed project, the following assumptions were used.

- **Solar Sites (1 through 3):** The three solar generation areas were modeled as area sources representing distributed operational noise associated with inverter equipment and associated electrical infrastructure located throughout each solar field. For modeling purposes, noise generating equipment was assumed to be spatially distributed across each designated solar site, and each area source was assigned a composite sound power level of 60 dBA to represent cumulative operational noise under full load conditions. Operational noise from solar facilities is typically dominated by inverter equipment and is characterized by low level, steady broadband sound without impulsive characteristics. This modeling approach assumes continuous operation during daylight hours and provides a conservative representation of solar related operational noise in the absence of finalized equipment layouts.
- **BESS:** Modeled as industrial building sources, with individual battery storage units spatially dispersed across the designated BESS development area. Each storage unit was assigned a

sound power level¹ (LwA) of 92 dB/m, m². A BESS typically generates noise levels ranging from 70 to 92 decibels when measured one meter from the component. Primary source of noise includes (1) power conversion system, which typically includes inverters, transformers, and switchgear, producing a steady hum; (2) cooling systems, due to batteries generating heat and often require air-cooled or liquid-cooled systems that produce continuous fan noise; and (3) ancillary equipment which includes circuit breakers and control systems that contribute additional mechanical noise.

- **Thermal Generation Site:** Modeled as an area source, representing distributed operational noise associated with plant equipment and supporting infrastructure. For modeling purposes, the noise source was assumed to occupy the entire designated thermal generation area. A composite sound power level of 100 dBA was assigned to the modeled area source to represent cumulative operational noise under full load conditions. This approach assumes that noise generating equipment is distributed throughout the site and operating simultaneously, providing a conservative representation of long term operational conditions in the absence of finalized equipment layouts.
- **Collector Substation (BESS & Solar):** The two collector substations were modeled as area sources representing distributed operational noise associated with electrical equipment and supporting infrastructure. For modeling purposes, noise generating equipment was assumed to be distributed throughout each designated substation area, and each area source was assigned a composite sound power level of 80 dBA to represent cumulative operational noise under full load conditions. This approach assumes continuous operation and provides a conservative representation of long term operational noise in the absence of finalized equipment layouts.
- **Substation Equipment.** Modeled as an area source, representing major electrical components expected to be included in the final design including transformers, switchgear, and associated cooling systems. These components typically operate continuously and generate steady state mechanical and electrical noise. For modeling purposes, a sound power level of 95 dBA per unit was assumed based on industry standard data for medium to large scale power transformers operating under full load conditions. Because a finalized substation layout is not yet available, assumptions regarding equipment type, placement, and orientation were based on typical substation configurations and conservative design parameters. All substation components were assumed to operate continuously over a 24-hour period to reflect typical load demand and power transmission functions. Potential shielding from substation walls, berms, or equipment enclosures was not included in the base model but may be evaluated in future scenarios as detailed design information becomes available.

1 The Sound Power Level represents the total sound energy produced by the source under the specified operating conditions. Sound Power Levels cannot be measured directly; instead, they are computed from reference sound pressure level measurements

- **Transmission Route:** Modeled as linear noise source² representing the above ground electrical collection system with a LwA of 50 dB/m, m². For modeling purposes, the alignment was represented as continuous line sources consistent with the overhead conductors and associated support structures distributed along the route. Based on current design information, the segment between the 230/500 kV substation and BESS Collection Substation includes four transmission circuits supported on two sets of structures, while the segment between Solar Collection Substation and BESS Collection Substation includes two circuits supported on a single set of structures. These configurations were reflected in the modeling by representing the applicable segments with multiple parallel line sources. Operational noise from overhead transmission lines is primarily associated with corona discharge, which may produce low level crackling, hissing, or buzzing sounds under certain atmospheric conditions, particularly during periods of high humidity or precipitation. This modeling approach provides a conservative representation of transmission related noise in the absence of finalized conductor specifications and structure spacing.

2 Transmission Line is conservatively based on a 230 kV line. Corona discharge noise generated by lower-rated lines would be less.

F. IMPACT ANALYSIS

To evaluate potential noise impacts associated with the proposed Project, modeled operational noise levels were compared to the limits established in the Pinal County Excessive Noise Ordinance, which sets quantitative standards based on zoning classification. Sensitive uses surrounding the Project site are located within the Residential (60 dBA daytime limit; 55 dBA nighttime limit) and Rural (65 dBA daytime limit; 60 dBA nighttime limit) zoning classifications. Modeled noise levels were also compared to the maximum measured ambient noise conditions to assess whether Project operations would result in a noticeable increase in the existing sound environment.

The results of the modeling analysis are provided in **Table 3: Modeled Exterior Noise Levels from Operational Sources**, which presents predicted exterior noise levels from operational sources for the three identified residential receptors, classified as R1 through R3. **Figure 3: Operational Noise Level Contour Map** presents a noise level contour map that depicts predicted operational noise levels across the surrounding area, including residential uses not individually listed in **Table 3**.

Based on this comparison, modeled noise levels at the nearest sensitive receptors remain below the County's daytime limit and nighttime limit for the Rural zoning designation and the more restrictive daytime limit and nighttime limit for the Residential zoning district. Furthermore, the comparison to existing ambient conditions indicates that Project generated noise would result in a minimal increase above ambient of approximately 0.1 dBA, which is well below perceptible levels and would not result in meaningful changes to the existing sound environment. As such, operational impacts from the proposed facility would not be considered significant.

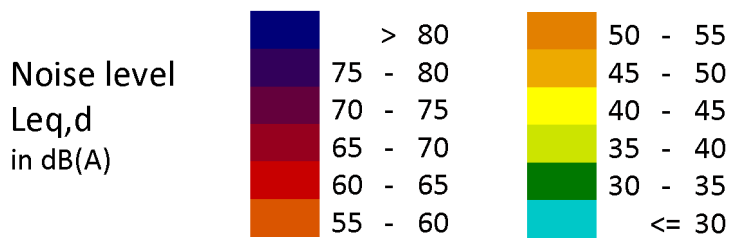
TABLE 3: MODELED EXTERIOR NOISE LEVELS FROM OPERATIONAL SOURCES							
Monitoring Site	Time Period	Modeled Noise Levels (A)	Ambient Noise Levels (B)	Modeled plus Ambient (C) (A+B)	Potential Noise Increase Above Ambient (C-B)	Exceeds Pinal County Daytime Limit?	Exceeds Pinal County Nighttime Limit?
		dBA					
NM1	Daytime	30.5	62.7	62.7	0.0	No ¹	—
	Nighttime	30.5	59.8	59.8	0.0	—	No ¹
NM2	Daytime	33.8	59.8	59.8	0.0	No ²	—
	Nighttime	33.8	54.7	54.7	0.0	—	No ²
NM3	Daytime	35.1	51.4	51.5	+0.1	No ¹	—
	Nighttime	35.1	51.4	51.5	+0.1	—	No ¹

Note:

¹ Located within the Rural Zoning District, daytime (7am-9pm) limits is 65 dBA and nighttime (9pm-7am) limits is 60 dBA.

² Located within the Residential Zoning District, daytime (7am-8pm) is 60 dBA and nighttime (8pm-7am) limits is 55 dBA.

Source: Refer to **Appendix 2.0** for SoundPLAN Output Sheets.



Operational Noise Level Contour Map

G. CERTIFICATION

I certify that this Noise Study was prepared by me or under my direct supervision and that the analysis presented herein represents my professional opinion regarding the existing noise environment and potential operational noise impacts associated with the proposed Marigold Energy Center Project. The analysis was conducted using standard acoustical methods and is based on the best available information at the time of preparation.

I certify that the statements and conclusions presented in this report are true and correct to the best of my knowledge.

If you have any questions regarding this analysis, please contact me directly at (818) 415-7274 or at ckirikian@meridianconsultantsllc.com

Sincerely,



**Christ Kirikian, INCE Associate
Managing Consultant (OM)**

ckirikian@meridianconsultantsllc.com



APPENDIX 1.0

Noise Monitoring Data Spreadsheets

Monitoring Location: NM1

Date: February 19 - 20, 2026

			Monitored Logarithmic		Evening/Night Adjustments	
Monitoring Period			Leq	Equivalent	10 dB	5 dB
am	Midnight	0 / 24	47.7	59437	594373	187957
	1:00	100	47.0	49902	499019	157804
	2:00	200	53.4	218610	2186105	691307
	3:00	300	43.4	21806	218056	68955
	4:00	400	63.1	2022218	20222181	6394815
	5:00	500	64.4	2776406	27764062	8779767
	6:00	600	60.6	1142392	11423916	3612559
	7:00	700	58.0	638070	6380695	2017753
	8:00	800	56.1	403053	4030529	1274565
	9:00	900	57.0	499624	4996237	1579949
	10:00	1000	60.2	1058196	10581957	3346309
	11:00	1100	62.6	1801316	18013164	5696263
pm	12:00	1200	66.3	4222095	42220950	13351437
	1:00	1300	66.8	4790579	47905789	15149141
	2:00	1400	57.8	600423	6004226	1898703
	3:00	1500	67.7	5871891	58718912	18568550
	4:00	1600	63.4	2206663	22066629	6978081
	5:00	1700	64.8	3006893	30068932	9508631
	6:00	1800	62.5	1766367	17663672	5585744
	7:00	1900	57.8	602203	6022031	1904333
	8:00	2000	53.1	204195	2041954	645723
	9:00	2100	54.5	282198	2821980	892389
	10:00	2200	62.9	1948978	19489783	6163210
	11:00	2300	54.5	280781	2807812	887908

Leq Morning Peak Hour 7:00-10:00 a.m.

57 dBA

Leq Evening Peak Hour 7:00-10:00 p.m.

55.6 dBA

Leq Nighttime 10:00 pm-7:00 a.m. (not adjusted)

59.8 dBA

Leq Daytime 7:00 am-10:00 p.m.

62.7 dBA

Leq 8-Hour

59.0 dBA

Ldn: 10 dB adjustment between 10:00 p.m. & 7:00 a.m.

66.7 dBA

CNEL: 5 dB adjustment between 7:00p.m. & 10:00 p.m., & 10 dB
adjustment between 10:00 p.m. & 7:00 a.m.

66.8 dBA

Difference between CNEL and Ldn

CNEL - Ldn 0.08941185

Monitoring Location: NM2

Date: February 19 - 20, 2026

			Monitored Logarithmic		Evening/Night Adjustments	
Monitoring Period			Leq	Equivalent	10 dB	5 dB
am	Midnight	0 / 24	48.8	75244	752444	237944
	1:00	100	49.6	90507	905074	286209
	2:00	200	52.1	162271	1622707	513145
	3:00	300	54.4	274741	2747407	868806
	4:00	400	57.4	551084	5510843	1742681
	5:00	500	57.5	564429	5644286	1784880
	6:00	600	58.1	649754	6497541	2054703
	7:00	700	59.8	956983	9569825	3026244
	8:00	800	63.6	2280489	22804891	7211540
	9:00	900	60.1	1022662	10226617	3233940
	10:00	1000	59.1	819185	8191850	2590490
	11:00	1100	61.8	1507370	15073705	4766724
pm	12:00	1200	63.2	2097669	20976692	6633412
	1:00	1300	62.7	1880975	18809749	5948165
	2:00	1400	58.5	709058	7090584	2242240
	3:00	1500	57.1	518234	5182341	1638800
	4:00	1600	58.1	641121	6411210	2027403
	5:00	1700	56.5	447239	4472393	1414295
	6:00	1800	55.9	391418	3914182	1237773
	7:00	1900	56.2	421638	4216382	1333337
	8:00	2000	54.8	298707	2987074	944596
	9:00	2100	53.7	234200	2342001	740606
	10:00	2200	50.4	110909	1109093	350726
	11:00	2300	51.8	152930	1529305	483609

Leq Morning Peak Hour 7:00-10:00 a.m.

62 dBA

Leq Evening Peak Hour 7:00-10:00 p.m.

55.0 dBA

Leq Nighttime 10:00 pm-7:00 a.m. (not adjusted)

54.7 dBA

Leq Daytime 7:00 am-10:00 p.m.

59.8 dBA

Leq 8-Hour

56.5 dBA

Ldn: 10 dB adjustment between 10:00 p.m. & 7:00 a.m.

62.3 dBA

CNEL: 5 dB adjustment between 7:00p.m. & 10:00 p.m., & 10 dB
62.5 dBA adjustment between 10:00 p.m. & 7:00 a.m.

Difference between CNEL and Ldn

CNEL - Ldn 0.21563629



APPENDIX 2.0

SoundPLAN Output Sheets

Marigold Energy Center Project Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Receiver Monitoring Location R1 FI G Ldn 36.9 dB(A) Leq,d 30.5 dB(A) Leq,n 30.5 dB(A)						
Solar Collector Substation	Default industrial noise	Area				
BESS Collector Substation	Default industrial noise	Area	-1.2	-7.6	-7.6	
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area	-29.8	-36.2	-36.2	
Solar Site	Default industrial noise	Area				
Solar Site	Default industrial noise	Area	-32.2	-38.7	-38.7	
Solar Site	Default industrial noise	Area	-25.6	-32.0	-32.0	
Substation	Default industrial noise	Area	22.3	15.9	15.9	
Thermal Generation Site	Default industrial noise	Area	31.4	25.0	25.0	
Proposed 230 kV Transmission Line (1)	Default industrial noise	Line	0.5	-5.9	-5.9	
Proposed 230 kV Transmission Line (2)	Default industrial noise	Line	0.6	-5.8	-5.8	
Proposed 230 kV Transmission Line (3)	Default industrial noise	Line	8.8	2.4	2.4	
Proposed 230 kV Transmission Line (4)	Default industrial noise	Line	8.9	2.5	2.5	
Proposed 230 kV Transmission Line (5)	Default industrial noise	Line	7.5	1.1	1.1	
Proposed 230 kV Transmission Line (6)	Default industrial noise	Line	7.3	0.9	0.9	
Proposed 230 kV Transmission Line (7)	Default industrial noise	Line	7.3	0.9	0.9	
Proposed 230 kV Transmission Line (8)	Default industrial noise	Line	7.2	0.8	0.8	
500 kV Transmission Line	Default industrial noise	Line	19.3	12.8	12.8	
230 kV Transmission Line	Default industrial noise	Line	-5.1	-11.5	-11.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	

Marigold Energy Center Project Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.3	3.9	3.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.3	3.9	3.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.4	4.0	4.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.4	4.0	4.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.3	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.3	3.9	3.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.4	3.9	3.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	

Marigold Energy Center Project Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.3	3.9	3.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.2	3.8	3.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.6	2.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	

Marigold Energy Center Project Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.0	2.6	2.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.0	2.6	2.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.2	3.2	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.7	3.3	3.3	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.8	3.4	3.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.9	3.5	3.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.0	3.6	3.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.1	3.7	3.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	8.9	2.5	2.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.0	2.6	2.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.0	2.6	2.6	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.1	2.7	2.7	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.4	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.0	3.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.5	3.1	3.1	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.6	3.1	3.1	

Marigold Energy Center Project Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.2	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.8	2.8	
Industrial building, room 1-Point source 01	Default industrial noise	Point	9.3	2.9	2.9	
Receiver Monitoring Location R2 FI G Ldn 40.2 dB(A) Leq,d 33.8 dB(A) Leq,n 33.8 dB(A)						
Solar Collector Substation	Default industrial noise	Area	12.3	5.9	5.9	
BESS Collector Substation	Default industrial noise	Area	-2.5	-8.9	-8.9	
Solar Site	Default industrial noise	Area	-16.8	-23.2	-23.2	
Solar Site	Default industrial noise	Area	-18.6	-25.0	-25.0	
Solar Site	Default industrial noise	Area	-19.7	-26.1	-26.1	
Solar Site	Default industrial noise	Area	-19.7	-26.1	-26.1	
Solar Site	Default industrial noise	Area	-17.5	-23.9	-23.9	
Solar Site	Default industrial noise	Area	-21.2	-27.6	-27.6	
Solar Site	Default industrial noise	Area	-23.6	-30.0	-30.0	
Solar Site	Default industrial noise	Area	-22.5	-28.9	-28.9	
Solar Site	Default industrial noise	Area	-20.6	-27.0	-27.0	
Solar Site	Default industrial noise	Area	-6.5	-12.9	-12.9	
Solar Site	Default industrial noise	Area	-8.0	-14.4	-14.4	
Solar Site	Default industrial noise	Area	-11.0	-17.4	-17.4	
Solar Site	Default industrial noise	Area	-1.2	-7.6	-7.6	
Solar Site	Default industrial noise	Area	-14.2	-20.6	-20.6	
Solar Site	Default industrial noise	Area	-10.6	-17.0	-17.0	
Solar Site	Default industrial noise	Area	-18.5	-24.9	-24.9	
Solar Site	Default industrial noise	Area	-15.6	-22.0	-22.0	
Solar Site	Default industrial noise	Area	-8.5	-14.9	-14.9	
Solar Site	Default industrial noise	Area	-11.7	-18.1	-18.1	
Solar Site	Default industrial noise	Area	-16.8	-23.2	-23.2	
Substation	Default industrial noise	Area	6.6	0.1	0.1	
Thermal Generation Site	Default industrial noise	Area				
Proposed 230 kV Transmission Line (1)	Default industrial noise	Line	33.5	27.1	27.1	
Proposed 230 kV Transmission Line (2)	Default industrial noise	Line	35.2	28.8	28.8	
Proposed 230 kV Transmission Line (3)	Default industrial noise	Line	-15.7	-22.1	-22.1	
Proposed 230 kV Transmission Line (4)	Default industrial noise	Line	-16.7	-23.1	-23.1	
Proposed 230 kV Transmission Line (5)	Default industrial noise	Line	-3.4	-9.8	-9.8	
Proposed 230 kV Transmission Line (6)	Default industrial noise	Line	-3.5	-9.9	-9.9	
Proposed 230 kV Transmission Line (7)	Default industrial noise	Line	-3.6	-10.0	-10.0	
Proposed 230 kV Transmission Line (8)	Default industrial noise	Line	-3.6	-10.0	-10.0	
500 kV Transmission Line	Default industrial noise	Line	4.4	-2.0	-2.0	
230 kV Transmission Line	Default industrial noise	Line	11.4	5.0	5.0	
Industrial building, room 1-Point source 01	Default industrial noise	Point	11.0	4.5	4.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.9	4.5	4.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.9	4.5	4.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.9	4.5	4.5	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.8	4.4	4.4	
Industrial building, room 1-Point source 01	Default industrial noise	Point	10.8	4.4	4.4	

Marigold Energy Center Project
Contribution level - Results

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Source	Source group	Source type	Ldn dB(A)	Leq,d dB(A)	Leq,n dB(A)	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.3	6.9	6.9	
Industrial building, room 1-Point source 01	Default industrial noise	Point	13.4	6.9	6.9	

EXHIBIT J
SPECIAL FACTORS

In accordance with Arizona Administrative Code R14-7-119, the Applicant provides the following information:

Describe any special factors not previously covered herein, which Applicant believes to be relevant to an informed decision on its application.

As described earlier in this Application, Salt River Project Agricultural Improvement and Power District (SRP) initiated the proposed Marigold Transmission Project (Project) to interconnect new generation resources proposed as part of the Marigold Energy Center Project (Energy Center) to the regional transmission grid.

SRP conducted an integrated public and routing process to obtain feedback on routing options and inform the public.

Summary of Public Process

SRP has conducted a public process comprised of numerous outreach activities. The outreach process informed the public, elected officials, jurisdictional agencies, property owners' customers, and stakeholders within the Project area. The process included postcard mailings and emails, elected officials and stakeholder briefings and meetings, a Project information line, live online open houses, and in-person open houses. In addition, social media and a Project website were used to inform the public and stakeholders.

The Project public process consisted of three phases. In each phase, SRP employed various methods of outreach to inform the public of the Project and solicit feedback on the route options.

Postcard Mailings, Emails, and News Releases

SRP mailed postcards and sent emails for the three phases of the public process to government entities, stakeholders, property owners and ED3 customers in the notification area which was buffered around the Energy Center by approximately 2.25 miles.

The postcard mailing for Phase 1 occurred on November 25, 2025, and is included in **Exhibit J-1a**. Phase 2 postcards were mailed on March 11, 2026, and are included in **Exhibit J-1b**. Phase 3 postcards were mailed on July 13, 2026, and are included in **Exhibit J-1c**.

Emails with the same content as the postcard mailers were sent to stakeholders, and customers for Phase 2 on March 16, 2026 and Phase 3 on July 17, 2026 based on email addresses provided during Phase 1 activities.

News releases were also issued for each phase.

Briefings/Meetings and Letters of Support

Throughout the Project process, team members held meetings with local jurisdiction and agency

representatives, including elected government officials, planning staff, and stakeholders to relay information about the Project, answer questions, and request feedback. These meetings enabled the Project team to identify stakeholder issues and share information about Project developments. A summary of agency and other stakeholder meetings is included in **Exhibit J-2a**. In addition, letters of support from agencies and stakeholders have been included in **Exhibit J-2b**.

Project Information Line

SRP provided an additional opportunity for members of the public to ask questions, provide comments and receive information by providing a Project information telephone line. The telephone number was provided in all Project communications. The Project line was answered live and/or messages were responded to within 24 hours including on weekends and holidays.

Public Meetings/Materials

SRP hosted live online and in-person open houses for each phase of the Project. Set out below is a summary of those meetings. Presentation and feedback materials for those meetings are included in **Exhibit J-3**. Phase 1 is included in **Exhibit J-3a**, Phase 2 in **Exhibit J-3b** and Phase 3 in **Exhibit J-3c**. Questions and comments were submitted through the on-line chat feature during virtual meetings. Hard copy comment forms were also available at the in-person open houses. All details received through the chat feature and comment forms are also included in **Exhibit J-3a, J-3b or J-3c** for their respective phases.

Phase 1

Live Online Open House Meetings

A Phase 1 live online open house meeting was held on December 18, 2025, at 5:30 p.m. A total of 28 members of the public attended the virtual open house on December 18, 2025, and a total of 49 live chat questions/comments were submitted.

These meetings consisted of detailed presentations and answers to questions that were sent in prior to the open house. SRP also had a live chat for attendees to use to submit questions.

In-Person Open House

An in-person open house was held on December 10, 2025, from 5:00-7:00 p.m. at the Stanfield Elementary School. The meeting was an open house/drop-in format where participants could view Project information boards and speak to Project resource specialists. In addition to SRP staff members, representatives of Electrical District 3 (ED3) were present to discuss their involvement in the Project. Project information and Project team members were accessible for two hours with 26 members of the public attending. The team addressed questions and listened to attendee comments. Refreshments were provided.

The community members who attended were very engaged and came prepared with questions, comments, and concerns regarding many aspects of the Project. Attendees were encouraged to fill out a comment form expressing their issues, concerns, or general statements. Four hardcopy comment cards and two Feedback Survey Forms were received at the open house. SRP also

provided comment forms that attendees could mail into SRP. Sign-in sheets, comment forms and notes written on flip charts during the meeting are included in **Exhibit J-3a**.

Phase 2

Live Online Open House Meetings

A Phase 2 live online open house meeting was held on March 31, 2026, at 6:00 p.m. A total of nine members of the public attended the meeting and a total of four live chat questions/comments were submitted. In addition to the Project Manager and meeting moderator, an expert in Battery Energy Storage System (BESS) safety participated in the live question and answer session to respond to participants' questions.

In-Person Open House

An in-person open house was held on March 25, 2026, from 5:00-7:00 p.m. at Stanfield Elementary School. The meeting was an open house/drop-in format where participants could view Project information boards and speak to Project resource specialists. In addition to SRP team members, representatives from ED3 and a representative from the Fire and Risk Alliance were in attendance to respond to questions. Project information and Project team members were accessible for two hours with 29 members of the public in attendance. The team addressed questions and listened to attendee comments. Refreshments were provided.

The community members who attended were very engaged and came prepared with questions, comments, and concerns regarding many aspects of the Project. Attendees were encouraged to fill out a comment card expressing their issues, concerns, or general statements. There was one hardcopy comment card turned in. Sign-in sheets, flip charts of written notes and comments forms are included in **Exhibit J-3b**.

Phase 3

Live Online Open House Meetings

A Phase 3 live online open house meeting was held on July 29, 2026 at 6:00 p.m. A total of 17 members of the public attended the meeting and a total of 24 live chat questions/comments were submitted. In addition to the Project Manager and meeting moderator, an expert in BESS safety participated in the live question and answer session to respond to participants' questions.

In-Person Open House

An in-person open house was held on July 28, 2026, from 5:00-7:00 p.m. at Stanfield Elementary School. The meeting was an open house/drop-in format where participants could view Project information boards and speak to Project resource specialists. In addition to SRP team members, representatives from ED3 and a representative from the Fire and Risk Alliance were in attendance to respond to questions. Project information and Project team members were accessible for two hours with 23 members of the public in attendance. The team addressed questions and listened to attendee comments. Refreshments were provided.

The community members who attended were very engaged and came prepared with questions, comments, and concerns regarding many aspects of the Project. Attendees were encouraged to fill out a comment card expressing their issues, concerns, or general statements. There were five hardcopy comment sheets turned in. Sign-in sheets, flip charts of written notes and comments forms are included in **Exhibit J-3c**.

A summary of all public comments from Phases 1, 2 and 3 that were received through the website or through meetings in addition to the comment forms and Feedback Survey Forms described above are included in **Exhibit J-2a**.

Website and Social Media

A Project website “<https://www.srp.net/Marigold>” was created as a central location to provide stakeholders and interested parties with updates, general Project information and opportunities for public comment. Interested parties were able to visit and review materials at their convenience and submit comments and questions through an embedded comment form. A copy of the website content from both Phase 1, Phase 2 and Phase 3 are shown in **Exhibit J-1a, Exhibit J-1b and Exhibit J-1c**, respectively. The Project website was also made available in Spanish. An example of the Spanish website content is included in **Exhibit J-1a, Exhibit J-1b and J-1c**.

Facebook, Instagram, and Nextdoor were used to reach additional interested parties and announce the live online open houses and the in-person open houses. Social media advertisements were posted between November 26, 2025 and December 10, 2025, March 11, 2026 and March 25, 2026 and July 13, 2026 and July 28, 2026, and are included in **Exhibit J-1**. Phase 1 social media advertisements are included in **Exhibit J-1a**, Phase 2 social media advertisements in **Exhibit J-1b** and Phase 3 social media advertisements in **Exhibit J-1c**.

Summary of Routing Process

Through the public process described above, the Applicant conducted a routing analysis that utilized opportunities and constraints as well as stakeholder and public input to develop, adjust, add and remove transmission routes. **Exhibit J-4** includes routing maps that demonstrate the full suite of routes analyzed and then ultimately included in this Application.

Summary of Routing Process

Using the stakeholder and public input from the public process described above, the Applicant conducted a routing analysis that utilized opportunities and constraints to develop, adjust, add and remove routes. **Exhibit J-4** includes routing maps that demonstrate the full suite of routes analyzed and ultimately included in this Application. The purpose of this routing analysis is to identify and evaluate the opportunities and constraints for each route, to determine preferred and alternate routes and route segments for this Application.

Project Study Area

The Applicant began the routing analysis by defining the Conceptual Locations for the Energy Center Components (Conceptual Locations) (**Figure J-4a**), utilizing existing SRP-owned property to the greatest extent feasible. The Conceptual Locations map is defined by the location of the

Marigold Substation and the solar and BESS Collector Substations.

Opportunities and Constraints

SRP developed siting criteria based on identified constraints and opportunities that could affect routing of the two new transmission lines. Using the criteria, SRP identified routing options.

- Constraints – Areas where siting the transmission line is possible, but issues or conditions exist that could make locating the Project more difficult, more time-consuming, or more costly. For example, these could be residential land uses, school, Planned Area Developments (PADs) etc.
- Opportunities – For transmission projects, siting opportunities are areas where siting the transmission line is possible, and the transmission line route may have fewer environmental impacts. For example, an opportunity exists where a transmission line can parallel existing linear facilities, so it is not necessary to introduce a new linear feature into the land use patterns of an area. In the Project Study Area, the existing linear features include transmission lines, roadways, parcel lines, and manmade waterways.

Preliminary opportunities and constraints were mapped and are shown on **Figure J-4b**.

The possible opportunities were evaluated by length, distance to constraints, natural, physical and social resources, existing land uses crossed, and planned developments, construction and maintenance constraints, and engineering constraints.

The preliminary review of opportunities resulted in removing some segments due to obvious routing constraints including unnecessary length, traveling the wrong direction based on Project endpoints, and inadequate room for a right-of-way (ROW) based on existing land uses and existing structures and development. **Figure J-4c** shows the route recommended for the Project.

The criteria established for this Project are listed below.

- A minimum ROW width of 165 feet
- ROW clear of obstructions and relatively flat
- Accessible via existing roads
- Maximize use of SRP-owned property to reduce private property impacts
- Minimize impacts to natural, cultural and social resources
- Minimize impacts to existing residences, schools, and other routing constraints
- Minimize impacts to future or planned residences, schools, and other routing constraints
- Maximize use of existing linear features (routing opportunities) roadways and manmade features

- Minimize impacts to individual parcels/properties by co-locating both required transmission lines
- Minimize overall length
- Minimize impacts to Planned Developments

Exhibit J-4 includes tables that analyze the proposed routes against the above listed criteria. The tables include details of routes based on the criteria to compare each route. Ultimately, based on stakeholder and public input along with the routing criteria and analysis, the route depicted in **Figure J-4c** was selected as proposed route.

EXHIBIT J-1
POST CARD MAILINGS, WEBSITE AND SOCIAL MEDIA ADS

EXHIBIT J-1A
PHASE 1



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1629292 | Marigold Energy Center

Wave 1

Ready for review



Salt River Project

Sponsored

...

SRP is hosting an open house on Dec. 10, 2025, for the proposed Marigold Energy Center in Stanfield, Arizona. Click the link below for details.



RELIABLE POWER FOR A GROWING ARIZONA

SRP.NET/MARIGOLD

Attend the open house.

LEARN MORE



Salt River Project

Sponsored

SRP tendrá una reunión de puertas abiertas el 10 de diciembre de 2025 para el Centro de Energía Marigold en Stanfield, AZ. Más detalles en el enlace.



ENERGÍA CONFIABLE PARA UN ARIZONA EN CRECIMIENTO

SRP.NET/MARIGOLD-ESP

Asiste al evento de SRP.

MÁS DETALLES

 **srpconnect**

RELIABLE POWER FOR A GROWING ARIZONA

Attend the Marigold Energy Center open house on Dec. 10.



[LEARN MORE](#)



Headline: Attend the open house.

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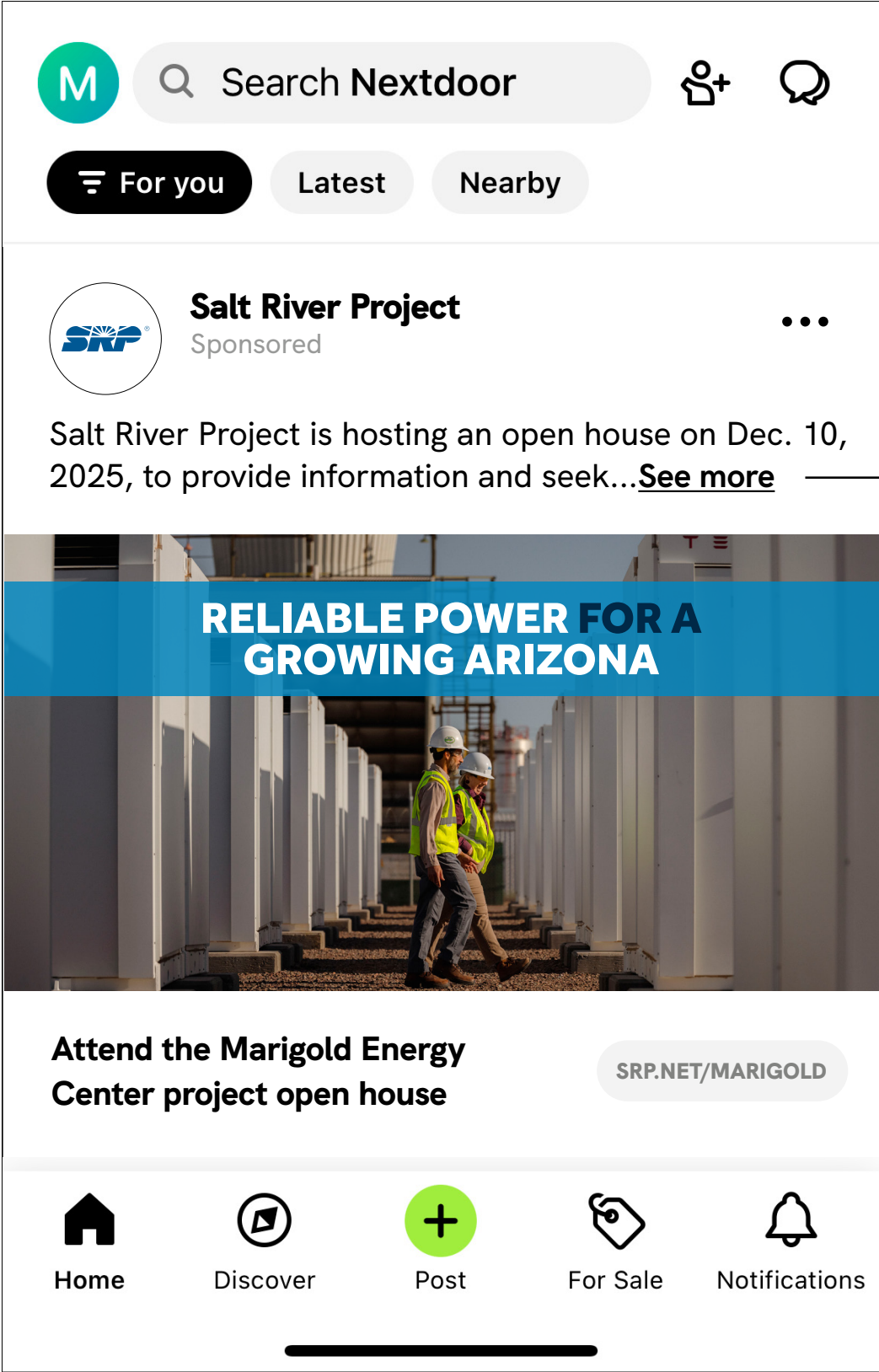
ENERGÍA CONFIABLE PARA UN ARIZONA EN CRECIMIENTO

Asiste a la reunión de puertas abiertas del Centro de Energía Marigold el 10 de diciembre.



MÁS DETALLES

Headline: Asiste al evento de SRP.



Salt River Project is hosting an open house on Dec. 10, 2025, to provide information and seek input for the planned Marigold Energy Center in Stanfield, Arizona.

The Marigold Energy Center would strengthen the local power grid to help ensure that SRP can meet the rapidly growing customer demand in Pinal and Maricopa counties.

Community members can stop by the open house anytime between 5 and 7 p.m. on Dec. 10, 2025.

Offer text (38/50): Open house on Dec. 10, Stanfield Elementary School

U Offer text (49/50): Open house on Dec. 10, Stanfield Elementary School



Salt River Project tendrá una reunión de puertas abiertas el 10 de diciembre de 2025 para dar a conocer información y solicitar opiniones sobre el proyecto del Centro de Energía Marigold en Stanfield, Arizona.

El Centro de Energía Marigold fortalecería la red eléctrica local para ayudar a garantizar que SRP pueda satisfacer la creciente demanda de los clientes en los condados Pinal y Maricopa.

Miembros de la comunidad pueden asistir a la reunión de puertas abiertas en cualquier momento entre las 5 p.m. y las 7 p.m. el 10 de diciembre de 2025.

Offer text (38/50): Reunión de puertas abiertas el 10 de diciembre en la Escuela Primaria Stanfield

U offer text (49/50): Evento el 10 de diciembre en la Escuela Stanfield


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Marigold Energy Center

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[Open house](#)

[Proposed location](#)

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About the project

SRP is planning the Marigold Energy Center, a mixed generation and storage facility project designed to meet near-term energy and capacity needs in central Arizona.

Plans are anticipated to include:

- ⚡ A 230-kilovolt (kV)/500 kV substation
- 📏 Approximately 4 miles of new 230 kV transmission lines
- 🔌 600 megawatts (MW) of solar generation
- 🔋 400 MW of battery energy storage
- 💧 Up to 675 MW of gas-fired generation

This project will build on SRP's commitment to provide Arizona with reliable and affordable power to keep up with economic growth. The project has the potential for collaboration with Electrical District No. 3 (ED3), a regional public power utility serving the communities of Maricopa, Stanfield and the surrounding area as they work to support their growing load. ED3 is evaluating a potential partnership with SRP to procure a portion of the energy generated by the Marigold Energy Center, enhancing its ability to serve local customers with reliable and competitively priced electricity.

Why is this project needed?

When completed, these generation and transmission resources will strengthen the power grid and help ensure that SRP can meet the electricity demand of a rapidly growing population. This combination of technologies will provide flexible, dispatchable capacity to support the growing customer base in Maricopa and Pinal counties while enhancing grid reliability and enabling the integration of intermittent renewable energy resources.

Open house

Join us for a community open house to learn more about the Marigold Energy Center.

Open house

Join us for a community open house to learn more about the Marigold Energy Center.

In-person



Dec. 10, 2025

Stanfield Elementary School
Cafeteria
515 S. Stanfield Road, Stanfield,
AZ 85172

Doors open at 5 p.m.
Doors close at 7 p.m.

[Sign up ↗](#)

Virtual



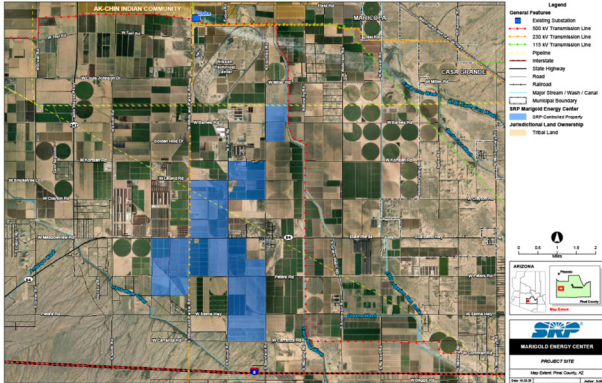
Dec. 17, 2025

5:30 p.m.
Questions taken via Q&A
feature

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Proposed location

Current proposed Marigold Energy Center location.



[Download Marigold Energy Center Map ↗](#)

Contact us

If you have questions about the project, please complete the form below, call (602) 236-2872 or email 2872line@arjnet.com.

First Name

M.I. (Optional)

Last Name

Address

ZIP:

City:

State:

Email required to receive project updates.

Email address (Optional)

Phone number (Optional)

Comments or Questions (Optional)

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If you have questions about the project, please complete the form below, call (602) 236-2872 or email 2872line@srpnet.com.

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M.I. (Optional)
Last Name

Address

ZIP:

City:

State:

Email required to receive project updates.

Email address (Optional)

Phone number (Optional)

Comments or Questions (Optional)

Submit



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Centro de Energía Marigold

En esta página:

- [Sobre este proyecto](#)
- [Reunión de puertas abiertas](#)
- [Ubicación propuesta](#)
- [Contáctanos](#)

Sobre este proyecto

SRP está planificando el Centro de Energía Marigold, un proyecto de instalación mixta de generación y almacenamiento diseñado para satisfacer las necesidades de energía y capacidad a corto plazo en el centro de Arizona.

Se espera que los planes incluyan:

- Una subestación de 230 kilovoltios (kV)/500 kV
- Aproximadamente 4 millas de nuevas líneas de transmisión de 230 kV
- 600 megavatios (MW) de generación solar
- 400 MW de almacenamiento de energía en baterías
- Hasta 675 MW de generación a gas

Este proyecto consolida el compromiso de SRP de proporcionar a Arizona energía confiable y asequible para impulsar el crecimiento económico. El proyecto ofrece la posibilidad de colaborar con el Distrito Eléctrico N° 3 (ED3), una empresa pública regional de energía que sirve a las comunidades de Maricopa, Stanfield y sus alrededores. ED3 está evaluando una posible alianza con SRP para adquirir parte de la energía generada por el Centro de Energía Marigold, lo que mejoraría su capacidad para brindar a los clientes locales electricidad confiable a precios competitivos.



¿Por qué es necesario este proyecto?

Una vez completadas, estas infraestructuras de generación y transmisión fortalecerán la capacidad de la red eléctrica estatal (SRP) para satisfacer la demanda de electricidad de la región. Esta combinación de tecnologías proporcionará capacidad flexible y gestionable para apoyar a la creciente base de clientes en los condados de Maricopa y Pinal, mientras mejora la confiabilidad de la red permitiendo la integración de recursos energéticos renovables intermitentes.

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Reunión de puertas abiertas

Acompáñanos en una reunión de puertas abiertas para la comunidad y descubre más sobre el Centro de Energía Marigold.

En Persona



10 de diciembre de 2025

Cafetería de la Escuela Primaria Stanfield
515 S. Stanfield Road,
Stanfield, AZ 85172
Puertas abren a las 5 p.m.
Puertas cierran a las 7 p.m.

[Inscríbete](#)

Virtual



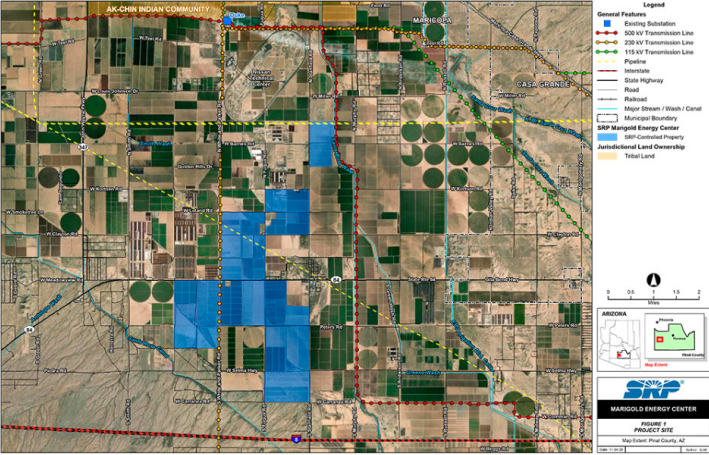
18 de diciembre de 2025

5:30 p.m.
Preguntas realizadas a través de la función de preguntas y respuestas

[Inscríbete](#)

Ubicación propuesta

Ubicación actual propuesta para el Centro de Energía Marigold.



[Descarga el mapa del Centro de Energía Marigold](#)

[Descarga el mapa del Centro de Energía Marigold](#)

Contáctanos

Si tienes preguntas sobre el proyecto, completa el formulario a continuación, llama al **(602) 236-2872** o envía un correo electrónico a 2872line@srpnet.com.

Nombre

Inicial *(Opcional)*

Apellido

Dirección

Código postal

Ciudad

Estado

AZ

Para recibir actualizaciones del proyecto, es necesario el email. Correo electrónico (Opcional)

Teléfono (Opcional)

Sugerencias o preguntas (Opcional)

Enviar

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Eléctrico comercial: (602) 236-8833
Irrigación de SRP: (602) 236-3333
La Línea: (602) 236-1111

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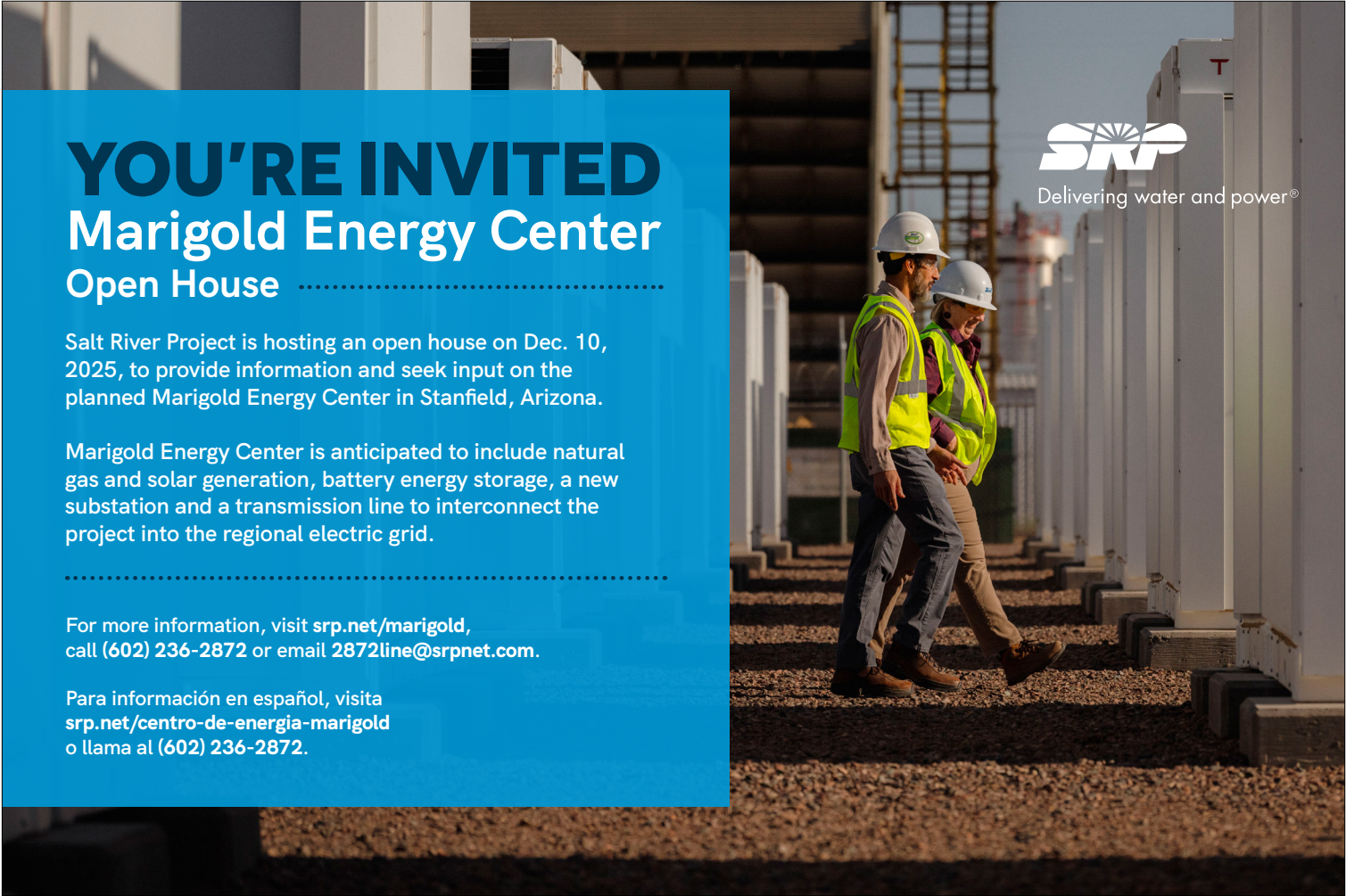
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1629292_Marigold_Energy_Center_Wave1_R5_SPA

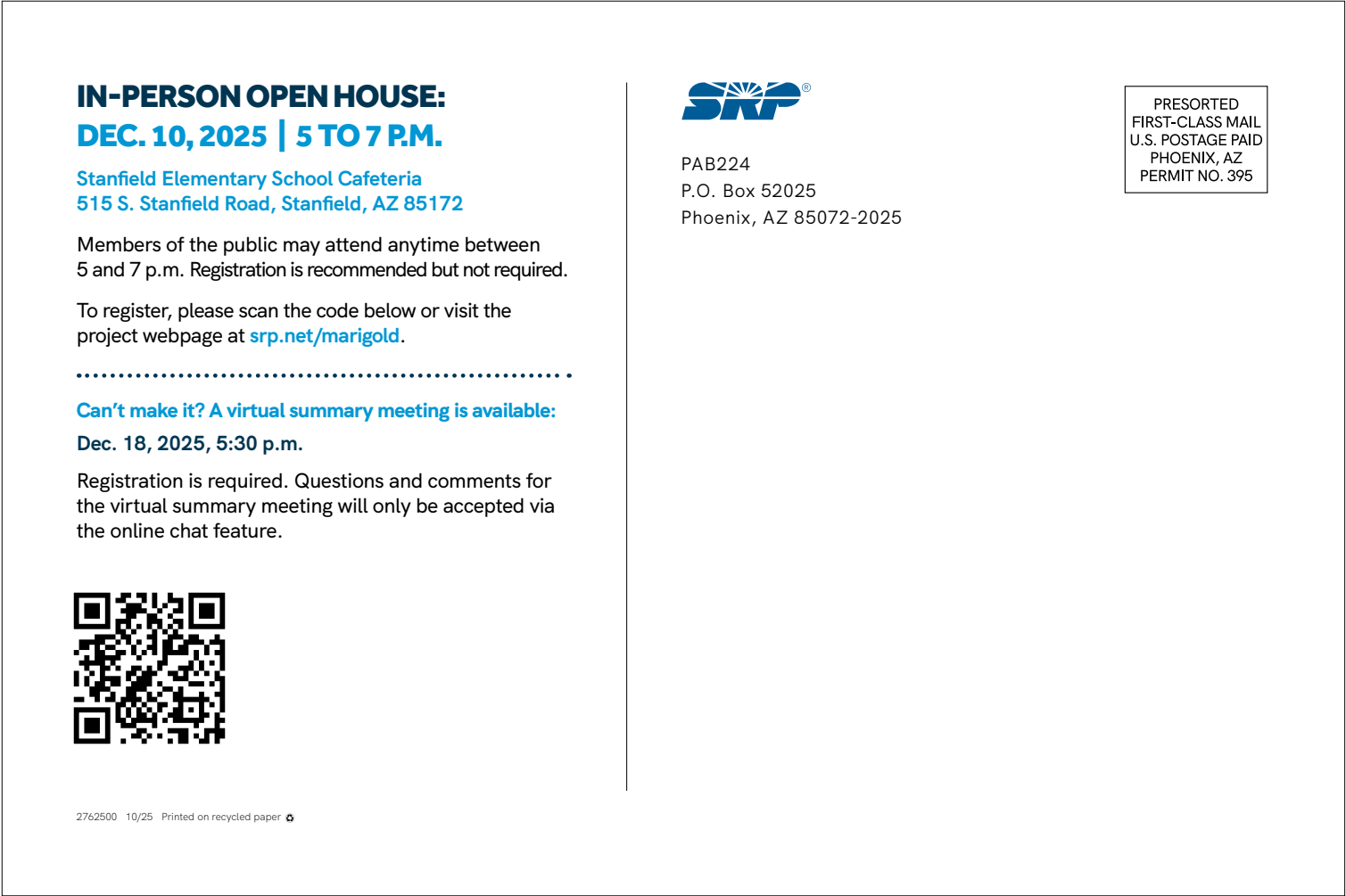
November 14, 202510

Approved

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Thank you.

EXHIBIT J-1B
PHASE 2



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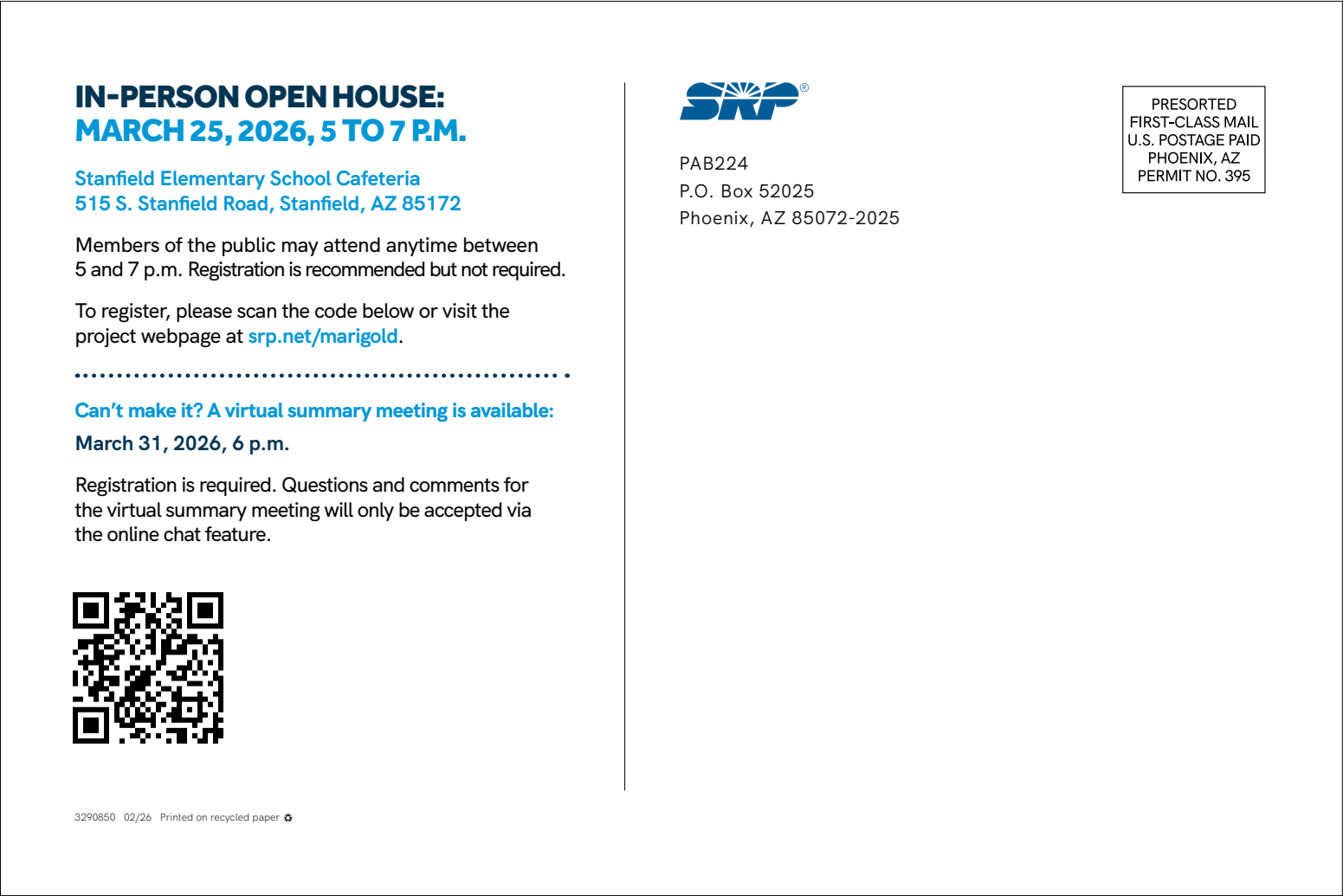
Wave 5

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Attend the Marigold Energy Center open house on March 25.



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Marigold Energy Center

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Open house

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In-person



March 25, 2026

Stanfield Elementary School
Cafeteria
515 S. Stanfield Rd.,
Stanfield, AZ 85172
Doors open at 5 p.m.
Doors close at 7 p.m.

[Sign up ↗](#)

Virtual



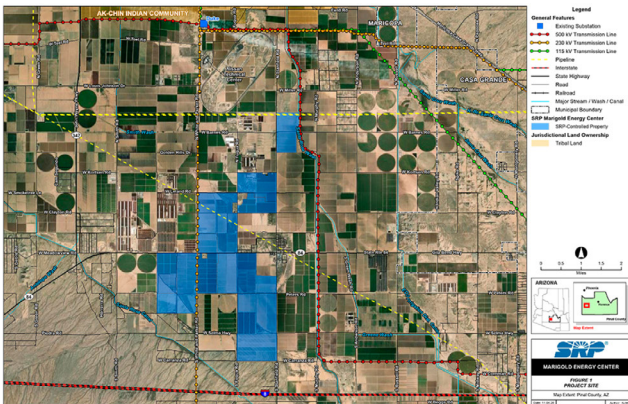
March 31, 2026

6 p.m.
Questions taken via Q&A feature

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Proposed location

Current proposed Marigold Energy Center location.



[Download Marigold Energy Center Map ↗](#)

Past events

Dec. 10, 2025: Open House Meeting

SRP hosted an open house at the Stanfield Elementary School on Dec. 10, 2025.

[Download the Dec. 10, 2025, Open House Materials](#)

Contact us

If you have questions about the project, please complete the form

 Download the Dec. 10, 2025, Open House Materials

Contact us

If you have questions about the project, please complete the form below, call (602) 236-2872 or email 2872line@srpnet.com.

First name

M.I. (Optional)

Last name

Address

ZIP

City

State

Email required to receive project updates.

Email address (Optional)

Phone number (Optional)

Comments or Questions (Optional)

Submit

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Centro de Energía Marigold

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Este proyecto consolida el compromiso de SRP de proporcionar a Arizona energía confiable y asequible para impulsar el crecimiento económico. El proyecto ofrece la posibilidad de colaborar con el Distrito Eléctrico N° 3 (ED3), una empresa pública regional de energía que sirve a las comunidades de Maricopa, Stanfield y sus alrededores. ED3 está evaluando una posible alianza con SRP para adquirir parte de la energía generada por el Centro de Energía Marigold, lo que mejoraría su capacidad para brindar a los clientes locales electricidad confiable a precios competitivos.



¿Por qué es necesario este proyecto?

Una vez completadas, estas infraestructuras de generación y transmisión fortalecerán la capacidad de la red eléctrica estatal (SRP) para satisfacer la demanda de electricidad de la región. Esta combinación de tecnologías proporcionará capacidad flexible y gestionable para apoyar a la creciente base de clientes en los condados de Maricopa y Pinal, mientras mejora la confiabilidad de la red permitiendo la integración de recursos energéticos renovables intermitentes.

Reunión de puertas abiertas

Acompáñanos en una reunión de puertas abiertas para la comunidad y descubre más sobre el Centro de Energía Marigold.

En persona



25 de marzo de 2026

Cafetería de la Escuela Primaria Stanfield

515 S. Stanfield Rd.,
Stanfield, AZ 85172

Puertas abren a las 5 p. m.
Puertas cierran a las 7 p. m.

[Inscríbete](#)

Virtual



31 de marzo de 2026

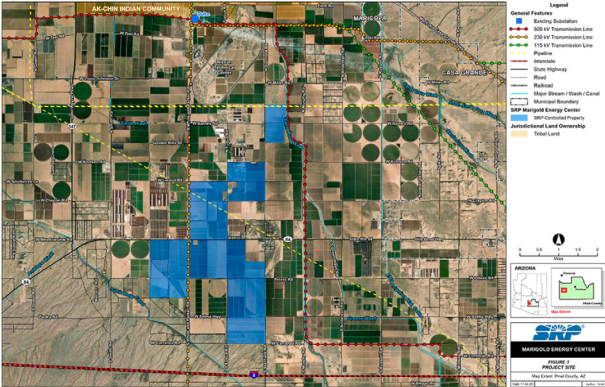
6 p. m.

Preguntas realizadas a través de la función de preguntas y respuestas

[Inscríbete](#)

Ubicación propuesta

Ubicación actual propuesta para el Centro de Energía Marigold.



[Descarga el mapa del Centro de Energía Marigold](#)

Eventos pasados

10 de diciembre de 2025: Reunión de Puertas Abiertas

SRP organizó una reunión de puertas abiertas en la Escuela Primaria Stanfield el 10 de diciembre de 2025.



Descarga los materiales de la reunión de puertas abiertas del 10 de diciembre de 2025

Contáctanos

Si tienes preguntas sobre el proyecto, completa el formulario a continuación, llama al **(602) 236-2872** o envía un correo electrónico

Contáctanos

Si tienes preguntas sobre el proyecto, completa el formulario a continuación, llama al **(602) 236-2872** o envía un correo electrónico a 2872line@srnet.com.

Nombre

Inicial (Opcional)

Apellido

Dirección

Código postal

Ciudad

Estado

AZ

▼

Para recibir actualizaciones del proyecto, es necesario el correo electrónico.

Correo electrónico (Opcional)

Teléfono (Opcional)

Sugerencias o preguntas (Opcional)

Enviar

ACERCA DE SRP

Biografía de la empresa

Sala de prensa (en inglés)

Carreras (en inglés)

Soy un empleado (en inglés)

Normas y reglamentos de SRP (en inglés)

SOPORTE

Contáctanos

Eléctrico residencial: (602) 236-8888

Eléctrico comercial: (602) 236-8833

Irrigación de SRP: (602) 236-3333

La Línea: (602) 236-1111

ENCUÉSTRANOS EN

Pública de privacidad de SRP

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Thank you.

EXHIBIT J-1C
PHASE 3



Delivering water and power®

1629292 | Marigold Energy Center

Wave 7

Ready for review

Front

YOU'RE INVITED

Marigold Energy Center

Open House

The Marigold Energy Center, located in Stanfield, Arizona, is anticipated to include natural gas and solar generation, battery storage, and the substation and transmission infrastructure needed to interconnect the project to the regional grid.

SRP management intends to seek approval from the SRP Board at its publicly noticed meeting on Sept. 14, 2026. For information on how to participate in person or virtually, please contact the SRP Corporate Secretary's office at (602) 236-4398 or by email at CorporateSecretary@srpnet.com.

The natural gas generation and transmission infrastructure will also require a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC). As part of the CEC process, the Arizona Power Plant and Line Siting Committee will hold a public hearing concerning the proposed natural gas plant and transmission infrastructure. This hearing is anticipated to begin on Sept. 21, 2026. Hearing details will be posted on the project website as they become available.

SRP is hosting open houses where the public can learn about the Marigold Energy Center and its potential community benefits as well as provide input on the project.

.....

For more information, visit srp.net/marigold, call (602) 236-2872 or email 2872line@srpnet.com.

Para información en español, visita srp.net/centro-de-energia-marigold o llama al (602) 236-2872.



Back

IN-PERSON OPEN HOUSE:

JULY 28, 2026 | 5–7 P.M.

Stanfield Elementary School Cafeteria
515 S. Stanfield Road, Stanfield, AZ 85172

Members of the public may attend anytime between 5 and 7 p.m. Registration is recommended but not required.

To register, please scan the code below or visit the project webpage at srp.net/marigold.

.....

Can't make it? A virtual summary meeting is available:
July 29, 2026, 6 p.m.

Registration is required. Questions and comments for the virtual summary meeting will only be accepted via the online chat feature.





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Phoenix, AZ 85072-2025

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Marigold Energy Center

On this page:

- About the project
- Next steps
- Open house
- Proposed location
- Past events
- Contact us

About the project

SRP is planning the Marigold Energy Center, a mixed generation and storage facility project designed to meet near-term energy and capacity needs in central Arizona.

Plans are anticipated to include:

- ⚡ A 230-kilovolt (kV)/500 kV substation
- 📶 Approximately 4 miles of new 230 kV transmission lines
- 🔋 600 megawatts (MW) of solar generation
- 🔋 400 MW of battery energy storage
- 💧 Up to 675 MW of gas-fired generation

This project will build on SRP’s commitment to provide Arizona with reliable and affordable power to keep up with economic growth. The project has the potential for collaboration with Electrical District No. 3 (ED3), a regional public power utility serving the communities of Maricopa, Stanfield and the surrounding area as they work to support their growing load. ED3 is evaluating a potential partnership with SRP to procure a portion of the energy generated by the Marigold Energy Center, enhancing its ability to serve local customers with reliable and competitively priced electricity.



Why is this project needed?

When completed, these generation and transmission resources will strengthen the power grid and help ensure that SRP can meet the electricity demand of a rapidly growing population. This combination of technologies will provide flexible, dispatchable capacity to support the growing customer base in Maricopa and Pinal counties while enhancing grid reliability and enabling the integration of intermittent renewable energy resources.

Next steps

SRP management intends to seek approval from the SRP Board at its publicly noticed meeting on Sept. 14, 2026. For information on how to participate in person or virtually, please contact the SRP Corporate Secretary's office at **(602) 236-4398** or by email at CorporateSecretary@srpnet.com.

The natural gas generation and transmission infrastructure will also require a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC). As part of the CEC process, the Arizona Power Plant and Line Siting Committee will hold a public hearing concerning the proposed natural gas plant and transmission infrastructure. This hearing is anticipated to begin on Sept. 21, 2026. Hearing details will be posted on the project website as they become available.

Open house

Join us for a community open house to learn more about the Marigold Energy Center.

SRP is providing information on the project and is seeking your input. Attendees of the open house will:

- Learn more about the regulatory processes required to receive a Certificate of Environmental Compatibility (CEC).
- Help evaluate the community benefits and how the project may support the local community.

In-person



July 28, 2026
Stanfield Elementary School Cafeteria
515 S. Stanfield Road, Stanfield, AZ 85172
Doors open at 5 p.m.
Doors close at 7 p.m.

Sign up ↗

Virtual

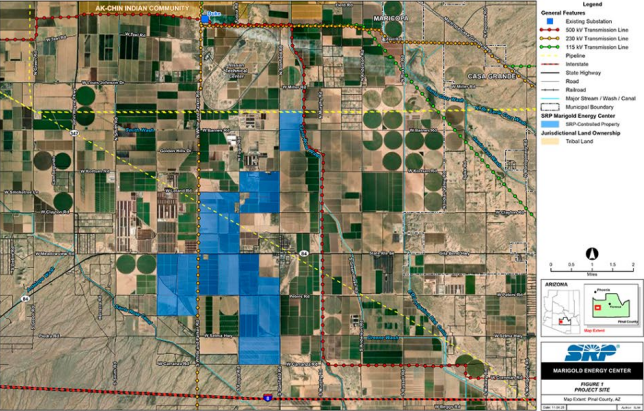


July 29, 2026
6:00 p.m.
Questions taken via Q&A feature

Sign up ↗

Proposed location

Current proposed Marigold Energy Center location.



Download Marigold Energy Center Map ↗

Past events

March 25, 2026: Open House Meeting

SRP hosted an open house at the Stanfield Elementary School on March 25, 2026.

Download the March 25, 2026, Open House Materials

December 10, 2025: Open House Meeting

SRP hosted an open house at the Stanfield Elementary School on December 10, 2025.

Download the December 10, 2025, Open House Materials

Contact us

If you have questions about the project, please complete the form below, call **(602) 236-2872** or email 2872line@srpnet.com.

First Name

M.I. (Optional)

Last Name

Address

ZIP code

City

State

AZ

Email required to receive project updates.
Email address (Optional)

Phone number (Optional)

Comments or Questions (Optional)

Submit

BACK TO TOP

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July 7, 2026 4

The yellow box indicates what has been updated.



Centro de Energía Marigold

En esta página:

[Sobre este proyecto](#)
[Próximos pasos](#)
[Reunión de puertas abiertas](#)
[Ubicación propuesta](#)
[Eventos pasados](#)
[Contáctanos](#)

Sobre este proyecto

SRP está planificando el Centro de Energía Marigold, un proyecto de instalación mixta de generación y almacenamiento diseñado para satisfacer las necesidades de energía y capacidad a corto plazo en el centro de Arizona.

Se espera que los planes incluyan:

- Una subestación de 230 kilovoltios (kV)/500 kV
- Aproximadamente 4 millas de nuevas líneas de transmisión de 230 kV
- 600 megavatios (MW) de generación solar
- 400 MW de almacenamiento de energía en baterías
- Hasta 675 MW de generación a gas

Este proyecto consolida el compromiso de SRP de proporcionar a Arizona energía confiable y asequible para impulsar el crecimiento económico. El proyecto ofrece la posibilidad de colaborar con el Distrito Eléctrico N° 3 (ED3), una empresa pública regional de energía que sirve a las comunidades de Maricopa, Stanfield y sus alrededores. ED3 está evaluando una posible alianza con SRP para adquirir parte de la energía generada por el Centro de Energía Marigold, lo que mejoraría su capacidad para brindar a los clientes locales electricidad confiable a precios competitivos.



¿Por qué es necesario este proyecto?

Una vez completadas, estas fuentes de generación y transmisión fortalecerán la capacidad de la red eléctrica estatal (SRP) para satisfacer la demanda de electricidad de la región. Esta combinación de tecnologías proporcionará capacidad flexible y gestionable para apoyar a la creciente base de clientes en los condados de Maricopa y Pinal, mientras mejora la confiabilidad de la red permitiendo la integración de recursos energéticos renovables intermitentes.

Próximos pasos

La gerencia de SRP tiene la intención de solicitar la aprobación de su Junta Directiva en la reunión de puertas abiertas programada para el 14 de septiembre de 2026. Para obtener información sobre cómo participar, ya sea en persona o de manera virtual, por favor comuníquese con la oficina del Secretario Corporativo de SRP al **(602) 236-4398** o por correo electrónico a CorporateSecretary@srpnet.com.

La infraestructura de generación y transmisión de gas natural también requerirá un Certificado de Compatibilidad Ambiental (CEC, por sus siglas en inglés) de la Comisión Corporativa de Arizona (ACC, por sus siglas en inglés). Como parte del proceso del CEC, el Comité de Ubicación de Plantas de Energía y Líneas de Arizona tendrá una audiencia pública sobre la planta de gas natural y la infraestructura de transmisión propuestas. Se espera que esta audiencia comience el 21 de septiembre de 2026. Los detalles de la audiencia se publicarán en el sitio web del proyecto a medida que estén disponibles.

Reunión de puertas abiertas

Acompáñanos en una reunión de puertas abiertas para la comunidad y conoce más sobre el Centro de Energía Marigold.

SRP está proporcionando información sobre el proyecto y solicita tu opinión. Los asistentes a la reunión de puertas abiertas podrán:

- Obtener más información sobre los procesos regulatorios requeridos para obtener un Certificado de Compatibilidad Ambiental.
- Ayudar a evaluar los beneficios comunitarios y la manera en que el proyecto puede apoyar a la comunidad local.

En persona



28 de julio de 2026
Cafetería de la Escuela Primaria Stanfield
515 S. Stanfield Road,
Stanfield, AZ 85172
Puertas abren a las 5 p.m.
Puertas cierran a las 7 p.m.

[Inscríbete ➤](#)

Virtual

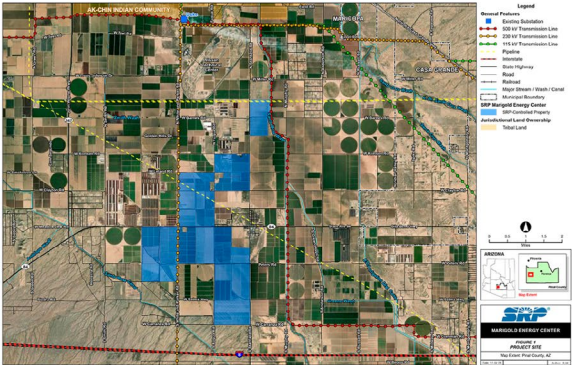


29 de julio de 2026
6:00 p.m.
Preguntas realizadas a través de la función de preguntas y respuestas

[Inscríbete ➤](#)

Ubicación propuesta

Ubicación actual propuesta para el Centro de Energía Marigold.



[Descarga el mapa del Centro de Energía Marigold ➤](#)

Eventos pasados

25 de marzo de 2026: Reunión de Puertas Abiertas

SRP organizó una reunión de puertas abiertas en la Escuela Primaria Stanfield el 25 de marzo de 2026.

[Descarga los materiales de la reunión de puertas abiertas](#)

Eventos pasados

25 de marzo de 2026: Reunión de Puertas Abiertas

SRP organizó una reunión de puertas abiertas en la Escuela Primaria Stanfield el 25 de marzo de 2026.

[Descarga los materiales de la reunión de puertas abiertas del 25 de marzo de 2026](#)

10 de diciembre de 2025: Reunión de Puertas Abiertas

SRP organizó una reunión de puertas abiertas en la Escuela Primaria Stanfield el 10 de diciembre de 2025.

[Descarga los materiales de la reunión de puertas abiertas del 10 de diciembre de 2025](#)

Contáctanos

Si tienes preguntas sobre el proyecto, completa el formulario a continuación, llama al **(602) 236-2872** o envía un correo electrónico a 2872line@srpnet.com.

Nombre

Inicial *(Opcional)*

Apellido

Dirección

Código postal

Ciudad

Estado

Para recibir actualizaciones del proyecto, es necesario el correo electrónico.

Correo electrónico *(Opcional)*

Teléfono *(Opcional)*

Sugerencias o preguntas *(Opcional)*

Enviar



1629292_Marigold_Energy_Center_Wave7_R5

July 7, 2026 5

Approved - Sent to Production



Salt River Project

Sponsored

...

SRP is hosting an open house on July 28, 2026, for the proposed Marigold Energy Center in Stanfield, Arizona. Click the link below for details.



RELIABLE POWER FOR A GROWING ARIZONA

SRP.NET/MARIGOLD

Attend the open house.

LEARN MORE



Salt River Project

Sponsored

...

SRP tendrá una reunión de puertas abiertas el 28 de julio de 2026 para el Centro de Energía Marigold en Stanfield, AZ. Más detalles en el enlace.



SRP.NET/MARIGOLD-ESP

Asiste al evento de SRP.

MÁS DETALLES



 **srpconnect**

ENERGÍA CONFIABLE PARA UN ARIZONA EN CRECIMIENTO

Asiste a la reunión de puertas abiertas del Centro de Energía Marigold el 28 de julio.



MÁS DETALLES



Salt River Project is hosting an open house on July 28, 2026, to provide information and seek input for the planned Marigold Energy Center in Stanfield, Arizona.

The Marigold Energy Center would strengthen the local power grid to help ensure that SRP can meet the rapidly growing customer demand in Pinal and Maricopa counties.

Community members can stop by the open house anytime between 5 and 7 p.m. on July 28, 2026.

Offer text (49/50): Open house on July 28, Stanfield Elementary School

U Offer text (49/50): Open house on July 28, Stanfield Elementary School

M

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Nearby

SRP

Salt River Project

Sponsored

Salt River Project tendrá una reunión de puertas abiertas el 28 de julio de 2026...[Ver más](#)

ENERGÍA CONFIABLE PARA UN ARIZONA EN CRECIMIENTO

Asiste al evento del Centro de Energía Marigold el 28 de julio

[SRP.NET/MARIGOLD-ESP](#)

Home

Discover

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Notifications

Salt River Project tendrá una reunión de puertas abiertas el 28 de julio de 2026 para dar a conocer información y solicitar opiniones sobre el propuesto Centro de Energía Marigold en Stanfield, Arizona.

El Centro de Energía Marigold fortalecería la red eléctrica local para ayudar a garantizar que SRP pueda satisfacer la creciente demanda de los clientes en los condados Pinal y Maricopa.

Miembros de la comunidad pueden asistir a la reunión de puertas abiertas en cualquier momento entre las 5 y 7 p. m. el 28 de julio de 2026.

Offer text (49/50): Evento el 28 de julio en la Escuela Primaria Stanfield

U offer text (45/50): Evento el 28 de julio en la Escuela Stanfield

Thank you.

EXHIBIT J-2
BRIEFINGS/MEETINGS AND LETTERS OF SUPPORT

EXHIBIT J-2A
BRIEFINGS/MEETINGS

Interaction Date	Contact ID	Affiliation (Contact ID) (Cont:	Interaction Type ID	Issue Category	Comments	SRP Response
3/23/2023	Stephen Miller	Pinal County Board of Supervis	Phone call outgoing	Early engagement	Discussed early engagement with communities in his district. Supervisor Miller is happy to help in any way.	B. Davis spoke to Supervisor Miller
3/30/2023	Kari Woodward	ED3	Phone call outgoing	Community research	Left my contact info with admin. Said it was regarding some community outreach I intend to do in the area, and wanted to some insight.	C. Hallows called K. Woodward
3/31/2023	TJ Shope	R-Coolidge	Meeting	Initial discussion		Initial discussion on new generation in Pinal County. Attendees: TJ Shope Rep Theresa Martinez Buck Davis
3/31/2023	Danielle Orasco	ED3	Phone call incoming/Email	Early engagement	Left a vm said that Kari Woodward passed my message along to her regarding community engagement..	C. Hallows returned her call left VM
4/4/2023	Danielle Orasco	ED3	Phone call outgoing		To discuss neighboring community.	Dani returned C. Hallows call. Discussed community engagement that ED3 currently has. Dani mentioned the only community event they host is for 4th graders at the Elementary School about electrical safety. Dani will keep us in mind if she thinks of anything else that might be helpful for us with engaging the community.
4/6/2023	Stephen Miller	Pinal County Board of Supervis	Briefing	Early engagement	Discussed communities in and around Stanfield area.	B. Davis, L. Brady and C. Hallows met with Supervisor Miller
4/24/2023	Stephen Miller	Pinal County Board of Supervis	Phone call outgoing		L. Brady called Supervisor Miller & left a voicemail	L. Brady called Supervisor Miller & left a voicemail
4/25/2023	Kevin Duncan	APS	Phone call outgoing	General inquiry	He said he recalls this area, but has limited information. He wanted the opportunity to check with others. He knows APS has had interest in the same broader area, not so specific to Stanfield, but in that general area so his boss may know more. He was in a 1-year rotational leadership program for the last year which took him out of siting, but he is returning on Monday. He mentioned there was supposed to be another 500 kV line but it won't be built due to a monument in the area that would have been affected? He did recall the existing 500 kV there. He said he would call me back after looking into it a little bit more.	S.Horgen reached out to inform him that SRP is purchasing property in the Stanfield area for potential generation. We are trying to gather more intel about the area. Ask him if he knew of anything that came up with the 500kV project.
4/25/2023	Hayley Harrington	Nissan	Phone call outgoing			C. Hallows called to give initial project details. Left a vm.
4/25/2023	Stephen Miller	Pinal County Board of Supervis	Email outgoing			L. Brady emailed Supervisor Miller asking for time to discuss Stanfield outreach.
4/28/2023	Stephen Miller	Pinal County Board of Supervis	Email outgoing			L. Brady emailed Supervisor Miller RE: Follow up request to discuss Stanfield outreach.
5/1/2023	Stephen Miller	Pinal County Board of Supervis	Call Incoming	Meeting coordination		L. Brady emailed C. Hallows to let her know that Supervisor Miller he has been in touch with Roger Valdez (the unofficial mayor's son-in-law), who is helping to coordinate a meeting in the next two weeks with a few community leaders. Supervisor Miller is calling his contacts today who live in Santa Rosa Ranches. He'll be back in touch soon.
5/4/2023	Hayley Harrington	Nissan	Call Incoming		Returned C. Hallows phone call. Suggested that Scott Bingman would be the appropriate contact.	
5/4/2023	Scott Bingman	Nissan	Phone call outgoing			C. Hallows left a vm to discuss the upcoming generation project.
5/5/2023	James Candland	Consultant	Phone call outgoing		Had a brief discussion on this project and the public engagement activities planned.	B. Davis called J. Candland
5/9/2023	Steve Matteson	Community Member	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/9/2023	Dave Klingensmit	Community Member	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	SRP attendees: C. Hallows & B. Davis
5/9/2023	Marylin Grant	Community Member	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/9/2023	Jackie Shields	Homeowner	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	SRP attendees: C. Hallows & B. Davis
5/9/2023	Kellie Smith	Homeowner	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/9/2023	Nancy Morford	Homeowner	Briefing		Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	SRP attendees: C. Hallows & B. Davis

5/9/2023	Debbie Carlson	Homeowner	Briefing	Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/9/2023	Kare Coffey	Homeowner	Briefing	Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/9/2023	Linda Rivera	Homeowner	Briefing	Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/9/2023	Shawn Gunter	Homeowner	Briefing	Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/9/2023	Laura Biggs-Archt	Homeowner	Briefing	Community members opposed SRP project and any other utility project. They do not want any type of construction or improvement project in their city. Community members thought this project was in partnership with suspected new development plans near their homes.	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/9/2023	Kare Coffey	Homeowner	Phone call outgoing		C. Hallows called K. Coffey to discuss expectations of scheduled meeting that afternoon, on 5/9/23.
5/10/2023	Brent Billingsley	Florence, Pinal County, Comm	Email Outgoing		On May 10, L. Brady emailed Pinal County Community Development Director Brent Billingsley. He appreciated the heads up asked that we update his team when we have more details to share.
5/10/2023	Kare Coffey	Homeowner	Call Incoming	K. Coffey called to discuss meeting the previous evening on 5/9. K. Coffey offered to help get some dair farm contacts for C. Hallows.	C. Hallows spoke with K. Coffey about the meeting the previous day. Meeting space coordination email from C. Hallows to L. Rivera: Email: Hi Linda, Thanks for coming out to our meeting on Tuesday and offering to help secure a better spot for next week. Have you heard back about being able to use a room at the school? If you need me to reach out to somebody I am happy to do so, just let me know! Thanks again! Christina Hallows
5/11/2023	Linda Rivera	Homeowner	Email outgoing		
5/16/2023	Virginia McHaney	Community Member	Comment Card	V. McHaney left following comment after community meeting: "Presentation was good but need more pros/cons on the project. My question is, is this going to affect our health, our economy & way of living?"	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting. SRP attendees: C. Hallows & B. Davis
5/16/2023	Agustin Melendez	Homeowner	Community Event		Response: Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Bas Aja	AZ Cattleman's Association	Community Event		SRP attendees: C. Hallows & B. Davis Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Sherry Manley	Community Member	Community Event		SRP attendees: C. Hallows & B. Davis Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Angle Mol	Community Member	Community Event		SRP attendees: C. Hallows & B. Davis

5/16/2023	Shannon Ratts	Community Member	Community Event	Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
				SRP attendees: C. Hallows & B. Davis
				Response: Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Ramona Button	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Terry Button	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Kare Coffey	Homeowner	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Georgia Fincher	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Carolyn Bingham	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Yolanda Gonzalez	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Julian Rodriguez J	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Nancy Burdsall	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Johnny Whitehear	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Linda Rivera	Homeowner	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Gene Archunde	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Laura Biggs Archu	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Joe Rodriguez	Resident	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Dave Klingensmit	Community Member	Community Event	SRP attendees: C. Hallows & B. Davis
				Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
5/16/2023	Jake Feenstra	Desert Cross Farms	Community Event	SRP attendees: C. Hallows & B. Davis

5/16/2023	David Feenstra	Landowner	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Steve Matteson	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Mike Berry	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Ana Hernandez	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Kolten Debold	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Toby Rodriguez	Homeowner	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Marshall Nalty	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	CJ Zinke	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Preston VanHofw	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Mark Sharp	Community Member	Community Event		Outreach meeting to discuss Stanfield Generation Project with community members. C. Hallows & B. Davis answered questions the community members had and promised to follow-up with a future meeting.
					SRP attendees: C. Hallows & B. Davis
5/16/2023	Jake Feenstra	Desert Cross Farms	Call Incoming	J. Feenstra heard about a new generation facility in Stanfield and wanted to know details.	C. Hallows briefed him on the very early details and invited him to the community meeting this evening at 6pm. C. Hallows reply to S. Andersen:
					Hi Sherry,
					Thanks for reaching out.
					Since we have not completed the land purchase and we do not know they type of generation that would be built, I do not have a construction timeline. There are many yet to be determined factors that contribute to an overall schedule. What I do know is that we have a resource need by the 2026/2027 timeframe.
					There will be more engagement opportunities to come. This meeting was the very early stage of our outreach.
5/17/2023	Sherry Andersen	Community Member	Email Incoming	S. Andersen emailed C. Hallows asking if the project proceeds when construction would begin? And also asked if other community meetings would be planned.	I hope this helps!

					C. Hallows replied to T. Rodriguez: Hi Toby, Thank you for reaching out. This project is not in the Regulatory Process yet at all. We are still in the early planning stage, that is the reason for the lack of details. The acreage of the project site is approximately 179 acres. I hope this helps!
5/17/2023	Toby Rodriguez	Homeowner	Email Incoming		
5/24/2023	Keith Seaman	House of Representatives	Meeting		F. Bailey, J. Baran & A. Eder did an introductory discussion with State Representative Keith Seaman
5/25/2023	Dave Klingensmit	Community Member	Call Incoming	D. Klingensmith called C. Hallows with project questions.	C. Hallows spoke with D. Klingensmith to answer questions about environmental, light, too close, no benefit, water, no vote on our board, state rep gave him our number. RF concerns. Burrowing owls.
					F. Bailey held an introductory discussion with State Senator TJ Shope this morning.
5/31/2023	TJ Shope	R-Coolidge	Meeting		
5/31/2023	Teresa Martinez	State Representative	Meeting		Per F. Bailey, did an introductory discussion with State Representative Teresa Martinez this week.
					Meeting with ED3 to discuss resource needs/collaboration.
					Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows
6/12/2023	Brian Yerges	ED3	Briefing	Meeting with ED3 to discuss resource needs/collaboration.	ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
					Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows
					ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
6/12/2023	Michael Bristol	ED3	Briefing	Meeting with ED3 to discuss resource needs/collaboration.	
					Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows
				Meeting with ED3 to discuss resource needs/collaboration.	ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
6/12/2023	Russell Smoldon	Consultant	Briefing		
				Len Drago (AZDEQ) received an email from resident to show opposition to the Stanfield project. Customer's complaints are: 1. The burning of fossil fuels. 2. Noise pollution. 3. light pollution. 4. The use of groundwater for cooling. 5. Power being sold to California. 6. Most of Pinal County and Stanfield doesn't have access to SRP power. AZDEQ doesn't have jurisdiction over the decision to build a plant nor the air permitting authority. Asked C. Hallows to follow-up with the customer so they can close out the complaint.	
6/12/2023	Len Drago	AZDEQ	Email incoming		C. Hallows let Len Drago know she has communicated with the initiating customer regarding this project. Told L. Drago that he can let the customer know to reach out to C. Hallows with any further questions or concerns.
					Meeting with ED3 to discuss resource needs/collaboration.
					Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows
					ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
6/27/2023	Russell Smoldon	Consultant	Briefing	Met to discuss Stanfield Generation Project	

6/27/2023	Michael Bristol	ED3	Briefing	Met to discuss Stanfield Generation Project	Meeting with ED3 to discuss resource needs/collaboration. Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
					Meeting with ED3 to discuss resource needs/collaboration. Attendees: SRP: Grant Smedley; Bill McClellan; Buchanan Davis; Christina Hallows ED3: Brian Yerges; Michael Bristol; Russell Smoldon RE- Resource needs/collaboration
6/27/2023	Brian Yerges	ED3	Briefing	Met to discuss Stanfield Generation Project	Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the diary. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic diary near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
					Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the diary. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic diary near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
8/17/2023	Carrie Ryerson	Shamrock	Briefing	Met to discuss Stanfield Generation Project.	Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the diary. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic diary near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
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8/17/2023	Devon McCelland	Shamrock	Briefing	Met to discuss Stanfield Generation Project	Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the diary. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic diary near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
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8/17/2023	Patrick Greiner	Shamrock Farms	Briefing	Met to discuss Stanfield Generation Project	Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the dairy. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic dairy near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
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8/17/2023	Doug Hubby	Shamrock	Briefing	Met to discuss Stanfield Generation Project.	Discussed Stanfield and future generation pretty broadly. disclosed the two properties that SRP is currently in escrow on, and discussed in general that SRP is purchasing property in the area for potential generation sites. We explained that SRP needs to build generation to meet expected load growth and demand and this area is attractive for a number of reasons. We indicated that no final decisions have been made on timing or type of generation asset. But that timing could be in service dates in 2027or 2028 and that the resource could be natural gas, solar or storage, or a combination of the three. We answered questions about timing, water use, general comments we have heard from others. We offered a tour of a natural gas plant and they offered a tour of the dairy. They were also interested in any information we had on emissions that could impact their cows, which number 22,000. They had some optics questions about having an organic dairy near a natural gas plant and how that would look. Attendees included: Shamrock: Carrie Ryerson; Devon McClelland; Patrick Greiner; Doug Hubby; Keeley Smith; Mark Engdahl (invited, did not attend) SRP: Michael O'Connor, Nina Mullins, Alexis Laurence, Christy Burke
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8/18/2023	Robert Miguel	Ak-Chin	Briefing	Introductory meeting. Discussed the explosive growth of the valley and the power needs that follow.	Introductory meeting. Discussed the explosive growth of the valley and the power needs that follow. Advised that SRP is actively pursuing land in the Stanfield area to potentially use for some type of generation resources. Chairman was pleased to be briefed early on and welcomes further discussions as the we move forward. Attendees: Christina Hallows; Buchanan Davis; Gwen Salt Chairman Robert Miguel (Ak-Chin)

8/29/2023	Brian Yerges	ED3	Briefing			Meeting with ED3 to discuss resource needs/collaboration.
						Attendees: SRP: Bill McClellan; Buchanan Davis; Christina Hallows ED3: Brian Yerges; Michael Bristol RE- Resource needs/collaboration
8/29/2023	Michael Bristol	ED3	Briefing		Meeting with ED3 to discuss resource needs/collaboration.	Meeting with ED3 to discuss resource needs/collaboration.
						Attendees: SRP: Bill McClellan; Buchanan Davis; Christina Hallows ED3: Brian Yerges; Michael Bristol RE- Resource needs/collaboration
10/19/2023	Melia Besich	Town of Superior	Email outgoing			Linda Brady sent a copy of the mailer today with details in an email to the following officials:
						Superior •Mayor Melia Besich •Todd Pryor, Town Manager
2/19/2024	James Devoe	Community Member	Call Incoming	Construction	J. Devoe called with general questions after seeing the project sign.	C. Hallows spoke with J. Devoe to answer questions he had about the project. C. Hallows followed up the phone call with an email to provide the September 2023 project update letter that was mailed out to customers.
4/3/2024	Jake Feenstra	Desert Cross Farms	Phone call incoming/Email		Jake called about the weed overgrowth on our property at Stanfield and Barnes. Wants to see if we would like to have him take care of the weeds and we pay him or if we can go out and handle.	I told him I would touch base with our maintenance group and circle back to him with an answer.
					On 5/14/24- Jake returned my call. Quoted \$30 an acre for the weed control and estimates the area in need to be around 148 acres. I told him I would work on getting approval to have him handle.	C. Hallows left Jake Feenstra a voicemail requesting a quote for weed control at SRP's 57mile property.
5/6/2024	Jake Feenstra	Desert Cross Farms	Phone call outgoing		D. Klingensmith emailed SRP looking for an update on the Stanfield Generation Project.	C. Hallows confirmed customer has received latest update, a mailer from September. There are no new updates to share with the customer.
5/6/2024	Dave Klingensmit	Community Member	Email Incoming			C. Hallows emailed Jake Feenstra requesting assistance with vegetation management (overgrown weeds) at the SRP property located on the northeast corner of Stanfield Rd and Barnes Rd. She also asked for the invoice showing the rate of \$30 per acre and the approximate acres covered (your initial estimate was around 148 acres), so SRP can send payment.
5/21/2024	Jake Feenstra	Desert Cross Farms	Email outgoing			SRP (C. Hallows) shared that there is no update. We will continue to keep the surrounding area informed as details are made available.
6/4/2024	Toby Rodriguez	Homeowner	Call Incoming	Project update	Toby called for an update on what we are planning to build on the 2 sites.	L. Brady provided initial project briefing
12/19/2024	Stephen Miller	Pinal County Board of Supervis	Meeting	Project Update		Recap from meeting with Supervisor Vitiello, Pinal County District 1:
2/27/2025	Rich Vitiello	Pinal County Supervisor Dist. 1	Meeting	Project Update		- Supports the use of coal, gas and solar generation - opposes battery storage due to safety concerns - Warns of excessive solar projects in the same area and proximity to homes - Discussed public meeting frequency and offered his offices as a meeting location, and offered to participate - Appreciates the early outreach and is open to discussions
4/1/2025	Pinal County Staff	Pinal County	Meeting	Project Update		L. Brady provided initial project briefing
4/15/2025	Mike Goodman	Pinal County	Meeting	Project Update & Briefing		L. Brady and B. Davis provided initial project briefing
4/15/2025	Jeff Serdy	Pinal County Board of Supervis	Meeting	Project Briefing		L. Brady and B. Davis provided initial project briefing
6/2/2025	Rich Vitiello	Pinal County Supervisor Dist. 1	Meeting	Project Update & Briefing		L. Brady provided second project briefing
6/25/2025	Jeff Serdy	Pinal County Board of Supervis	Meeting	Project Update & Briefing		L. Brady and B. Davis provided second project briefing
7/1/2025	Mike Goodman	Pinal County	Briefing		Supervisor Goodman met with SRP for project briefing	B. Davis met with Pinal County Supervisor Goodman to give updates on project.
7/2/2025	Stephen Miller	Pinal County Board of Supervis	Briefing		Supervisor Miller met with SRP to discuss project.	L. Brady met with Supervisor Miller to discuss on going project and provide updates.
7/9/2025	Jeffrey McClure	Pinal County Board of Supervis	Briefing		Supervisor McClure met with SRP for an initial briefing on the Marigold Project.	L. Brady and B. Davis met with the supervisor for an initial briefing on the project.
7/31/2025	Pinal County Staff	Pinal County	Meeting		Members of the Pinal County staff went to a briefing on the project.	L. Brady met with Pinal County staff to give a briefing on the project,
8/19/2025	Katy Proctor	City of Maricopa	Meeting		Katy Proctor met with SRP to discuss project.	L. Brady and P. Diross met Katy Proctor to discuss and give a briefing on project.

Josh Bowman from the City of Maricopa met with SRP and ED3 for a project briefing.					L. Brady gave a briefing with ED3 consulting to Josh Bowman of the City of Maricopa.
9/18/2025	Josh Bowman	City of Maricopa	Meeting		
11/10/2025	Rene Lopez	ACC Commissioner	Meeting	Project Update	M. Tarango met with Commissioner R. Lopez to provide an initial project briefing
11/10/2025	Kevin Thompson	Commissioner - November 20	Meeting		M. Tarango met with Chairman K. Thompson to provide an initial project briefing
11/10/2025	Nick Myers	ACC	Meeting	Project Update	M. Tarango met with Vice Chairman N. Myers to provide an initial project briefing
11/10/2025	Lea Marquez-Peterson	Commissioner	Meeting	Project Update	M. Tarango met with Commissioner L. Marquez Peterson to provide an initial project briefing
11/18/2025	Gail Griffin	Representative	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
11/18/2025	Dan Schweibert	Chairwoman Lea Marquez Peterson	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
11/18/2025	Teresa Martinez	State Representative	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
11/18/2025	Chris Lopez	State Representative	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
11/18/2025	Simone Westbrook	Senate Majority Policy Advisor	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
11/18/2025	TJ Shope	R-Coolidge	Meeting	Project Update - Open House	F. Bailey shared the project postcard and extended an invitation to the Open House.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Jeff Serdy	Pinal County Board of Supervisors	Email outgoing	Project Update- Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Rich Vitiello	Pinal County Supervisor District 1	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Leo Lew	Pinal County	Email outgoing	Project Update-Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Barry Goldman	District Administrator - District 1	Email outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Mike Goodman	Pinal County	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Haylie Studebaker	Pinal County Assistant to the Board	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Steve Miller	Pinal County Board of Supervisors	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Brandon Gaylord	District Administrator - District 2	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Carole Hooper	Administrative Specialist - District 3	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Himanshu Patel	Town of Florence	Email outgoing	Project Update- Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Dedrick Denton	Interim Associate Director for District 4	Email outgoing	Project Update- Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Jeff McClure	Pinal County Supervisor, District 4	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
					L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
11/21/2025	Trecia Koozer	Pinal County, District 4	Email Outgoing	Project Update - Open House	Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.

11/21/2025	Brent Billingsley	Florence, Pinal County, Comm	Email outgoing	Project Update- Open House		L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
						Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
11/21/2025	Joe Ortiz	Managing Director of Developr	Email outgoing	Project Update- Open House		L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
						Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
11/21/2025	Connie Van Driel	District Admin- District 5. Pina	Email outgoing	Project Update- Open House		L. Brady emailed invitation to December 10, 2025 open house for Marigold Energy Center. Advised second open house being planned for February 2026 timeframe.
						Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
11/21/2025	Todd Williams	Deputy Director Community D	Email outgoing	Project Update- Open House		Copy of Marigold Energy Center Dec. 10 Open House Post Card attached to email and provided project website.
11/24/2025	Arizona Chamber	AZ Chamber	Meeting	Project Update - Open House		J. Mayer provided the Arizona Chamber with general project briefing and shared open house invitation via email.
11/24/2025	Greater Phoenix Chamber of Commerce		Meeting	Project Update - Open House		J. Mayer provided general project briefing and shared open house invitation via email.
11/24/2025	Casa Grande Cha	Casa Grande	Meeting	Project Update - Open House		J. Mayer provided general project briefing and shared open house invitation via email.
11/24/2025	Maricopa Busines	Maricopa Business Alliance	Meeting	Project Update - Open House		J. Mayer provided general project briefing and shared open house invitation via email.
12/4/2025	Jake Feenstra	Desert Cross Farms	Email Incoming	Weed Control	J. Feenstra emailed: the weeds, etc. are getting bad on the SRP property on Barnes Rd. and Stanfield Rd. A couple of years ago our company Desert Cross Farms disked them for SRP. Inquiring if SRP would like them to do so again.	C. Hallows responded she appreciates the notification and will discuss with project manager. Also included attachment with open house invitation.
						Hi Trent,
						It was nice chatting with you last night at the open house, thanks for attending.
						Yes, this proposed project is planned to be on the SRP owned land shown in blue on the project map on the web site (srp.net/marigold). There is no need for additional land at this time.
12/10/2025	trent rustan	Resident	Web Site Comment		Is the project going on the SRP controlled land? Are the boundary lines fixed?	Christina Hallows Public Involvement Manager
12/12/2025	Rich Vitiello	Pinal County Supervisor Dist. 1	Meeting	Project Updates		C. Dobson and L. Brady briefed Supervisor Vitiello, where discussion of project updates took place and reinforced our commitment to transparency and collaboration. L. Brady assured that we will provide more clarity at each upcoming workshop and that she will keep him fully informed before any details are made public. He stressed that he can be a strong ally as long as we keep him updated, and he welcomed any tools or resources we can provide to help him communicate effectively. L. Brady shared the dedicated project phone number and email address for constituents to share feedback or ask questions, so he doesn't have to take the brunt of the opposition personally. This should help redirect concerns and give his office some relief while ensuring we capture input directly.
						L. Sjoberg responded to D. Klingensmith: Thank you for your interest in the Marigold Energy Center Project.
12/18/2025	Dave Klingensmit	Community Member	Web Site Comment	Project Information	Hi, I would like the Docket number for this project that's going before the Corporation Commission? Thank you.	A docket number will not be available until a Certificate of Environmental Compatibility application is filed, which we anticipate happening in the summer of 2026. This project is still in the preliminary planning stages.
12/18/2025	Skye Bradley	Community Member	Web Site Comment		Please disconnect and redirect your project hidden Valley. Better yet go below the gate where thereäs no homes and no complaints	Keep in mind our project website (link to website provided) is the best source for up-to-date information.
12/19/2025	Rich Vitiello	Pinal County Supervisor Dist. 1	Phone call outgoing	Project Updates		Supervisor Vitiello requested a call from our Consultant (KPE) who presented at the virtual open house the night prior. He mentioned receiving many constituent phone calls regarding the project and he is telling them that he regularly receives briefings on the project by SRP. He suggested that SRP touch base with the fire chief in Arizona City, as the new fire station that will be built as part of the Project Bella commitments, will be ran by Arizona City. KPE thanked him for the information and also reiterated that this is the first round of public meetings in a series that SRP plans to have for this project. We knew it was important to engage early with the community. He appreciated the approach.
12/20/2025	Stephen Miller	Pinal County Board of Supervis	Meeting	Project Updates		L. Brady met with Supervisor Miller to brief on the project - his district also falls within the project area. He, too, has received complaints but has been able to respond effectively.

12/22/2025	Rich Vitiello	Pinal County Supervisor Dist. 1	Phone call outgoing	Project Update	L. Brady called Supervisor Vitiello: He mentioned receiving over a dozen calls and numerous emails expressing concerns about the project and the perceived vagueness of some responses during the Open House. I acknowledged that it's always challenging to determine the right time to begin public discussions, especially when details are still evolving, but emphasized that we believe early engagement is the best approach. He agreed and appreciated our proactive outreach. Advised there is a dedicated project phone number and email address for constituents to share feedback or ask questions, so he doesn't have to take the brunt of the opposition personally. This should help redirect concerns and give his office some relief while ensuring we capture input directly.
12/22/2025	Carrie Ryerson	Shamrock	Email Outgoing	Community Engagem these issues.	Nina Mullins and AGM M.J. O'Connor have been talking with C. Ryerson regarding the SRP Community engagement activity in Stanfield. SRP engaged with Shamrock Farms executive management team early on when we initially started procuring property in Stanfield, to begin building a relationship and addressing their concerns. They have had a couple lunch meetings with them, toured their dairy in Stanfield, and have given them an SRP Watershed tour. M. O'Connor received the questions above to address. A copy of the PowerPoint presentation that was recently given to the Board Committee and Open House. After consulting with Project SMEs, they responded: Will the heat from the solar panels increase the temperature near the facility? There will be no change in temperature surrounding the solar facility after installation and upon commercial operation. Research has shown that there are small increases in temperatures within large solar facilities, however any increases dissipate quickly and are immeasurable beyond 100 feet of the solar panels. Will there be any noise impacts from the turbines? SRP will conduct noise studies to evaluate noise levels from the project relative to existing background noise levels. As we continue to develop the Project and complete these studies, we are committed to mitigating these impacts as much as feasible and sharing our studies and information with the public when they are available. SRP Project team is also available to meet with Shamrock if they would like to further discuss.
12/29/2025	Jake Feenstra	Desert Cross Farms	Email Outgoing	Weeds	C. Ryerson called and spoke with AGM M. O'Connor, she also emailed him and N. Mullins asking questions related to the heat off of the panels and the noise from the turbines in terms of their impact on the cows, further requesting any information that could be shared on the analysis of both of C. Hallows granted permission for J. Feenstra to move forward with weed control at the SRP Property on Barnes Rd and Stanfield Rd and provided information on how to submit an invoice in vendor system.
1/5/2026	Julia Gusse	Stanfield Resident	Email Incoming	Requesting Informati	J. Gusse incoming email to media relations: I registered to attend the scheduled meetings, do you happen to have a link to the meeting minutes or anything regarding the discussion? I am a property owner in Stanfield and would like more information. Respectfully, Julia R. Gusse 74 N Navajo Way Media Relations sent a link to the project website which has all of the most up to date information including the virtual open house.

1/9/2026	Julia Gusse	Community Member	Web Site Comment	Local Office Facility for the Marigold Center Dear SRP, On behalf of 5X Gusse Properties, LLC, a veteran-owned small business, I am writing to present a proposal that I believe would be mutually beneficial for SRP and the residents you serve in our community. I currently own a residential property located directly across the street from your local water company facility. As you may be aware, the nearest SRP office is in the Phoenix Metro area, many miles away for Stanfield, AZ. This distance can present challenges once your Marigold project gets off the ground. I would like to propose leasing my residential property for use as a local office facility to better serve both your employees and the surrounding community. The home could be repurposed as office space, providing your staff with a convenient location to conduct operations while offering customers a more accessible point of contact. This would not only strengthen business relations with local residents but also demonstrate SRP's continued commitment to community responsiveness and customer service. Furthermore, by having staff on site, your company can add an extra layer of security to the nearby facility that will be under construction, assuring residents that this vital community resource remains protected from tampering and safeguarded. In addition to the home, I also own the adjacent empty fenced in lots (Assessor parcel numbers 503160640 and 50316065B) across the street from the Arizona Water Company and adjacent to the gas line. This property could be utilized as an outdoor storage area for equipment, vehicles, or other operational needs, providing an added layer of convenience for your team. If this opportunity works out, 5X Gusse Properties, LLC would be glad to work with you on tenant improvements to ensure the facilities are tailored to meet your operational requirements. Or we would consider selling the property outright to SRP. As a professional landlord and community partner, I am committed to	Ms. Gusse, Thank you for reaching out and for taking the time to share your thoughtful proposal regarding the potential use of your property in support of SRP's planned Marigold generation project. We appreciate both your interest in the project and your willingness to explore ways to support our operations and the surrounding community. At this stage, our team is continuing to evaluate operational needs and site-specific requirements as the project planning progresses. While we are not in a position to pursue alternative offices or storage locations at this time, we value the information you have provided and will keep it in mind as the project advances and future needs are assessed. We appreciate your proactive outreach and commitment to the Stanfield community, as well as sharing the background on your properties and flexibility around potential arrangements. Should circumstances change or additional needs arise, we may reach out to revisit opportunities such as those you outlined. Thank you again for your interest and for thinking of SRP as the Marigold project moves forward. We wish you the best and appreciate your support of local development efforts.
1/21/2026	Gail Griffin	Representative	Meeting	Project Update	SRP A. Eder, F. Bailey, B. Fitzgerald, and W. Loper briefed Rep. Griffin providing a project overview, including different system components, land acquisition, public engagement process and construction timeline. Legislators provided feedback that solar could be an issue, but other than that, no major concerns expressed.
1/21/2026	Chris Lopez	State Representative	Meeting	Project Update	SRP A. Eder, F. Bailey, B. Fitzgerald, and W. Loper briefed Rep. Lopez providing a project overview, including different system components, land acquisition, public engagement process and construction timeline. Legislators provided feedback that solar could be an issue, but other than that, no major concerns expressed.
1/21/2026	Teresa Martinez	State Representative	Meeting	Project Update	SRP A. Eder, F. Bailey, B. Fitzgerald, and W. Loper briefed Rep. Martinez providing a project overview, including different system components, land acquisition, public engagement process and construction timeline. Legislators provided feedback that solar could be an issue, but other than that, no major concerns expressed.
1/21/2026	Dan Schweibert	Chairwoman Lea Marquez Petr	Meeting	Project Update	SRP A. Eder, F. Bailey, B. Fitzgerald, and W. Loper briefed Rep. Schweibert providing a project overview, including different system components, land acquisition, public engagement process and construction timeline. Legislators provided feedback that solar could be an issue, but other than that, no major concerns expressed. We received your questions from Supervisor Miller. Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 is an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated.
1/21/2026	Alan Reese	Member, Synadase Farms LLC	Email Outgoing	Aesthetics	Shared project website for latest up to date information with A. Reese.

1/21/2026 Pinal County Plan Planning Division	Email Outgoing	Project Update & Aesthetics	L. Brady emailed the Planning Division of Pinal County to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.
1/21/2026 Dedrick Denton Interim Associate Director Cor	Email Outgoing	Project Update & Aesthetics	L. Brady emailed D. Denton to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.
1/21/2026 Steve Miller Pinal County Board of Supervis	Email Outgoing	Project Update & Aesthetics	L. Brady emailed S. Miller to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.

1/21/2026 Mike Goodman	Pinal County	Email Outgoing	L. Brady emailed M. Goodman to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 is an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.
1/21/2026 Joe Ortiz	Managing Director of Developr	Email Outgoing	L. Brady emailed J. Ortiz to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 is an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.
1/21/2026 Haylie Studebake	Pinal CountyAssistant to the Br	Email Outgoing	L. Brady emailed H. Studebaker to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 is an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.

1/21/2026	Carole Hooper	Administrative Specialist - Dist Email Outgoing	Project Update & Aesthetics		L. Brady emailed C. Hooper to advise that the Public Involvement team has responded to the inquiry from Synadase Farms. Their responses to the questions raised are summarized here: Would SRP provide visual screening walls along the solar portion of the project? SRP is considering targeted visual screening that would focus on cost-effective approaches, such as vegetative screening, and comply with applicable local and county requirements. Is SRP considering screening the Stanfield Road corridor from Interstate 8 to Highway 84 is an important link to the Town of Stanfield and Highway 84. Would they consider a screening wall on only that portion of their project? SRP has noted the request for screening along the Stanfield Road corridor. Discussion regarding possible screening locations, materials, and feasible extents along Stanfield Road will occur at future public open houses and community meetings, where additional community input can be gathered and evaluated. Our team is happy to continue answering questions or assisting with any concerns your offices may receive. Following our December 10 (in-person) and December 18 (virtual) Open House #1 events, SRP plans to host another open house and will share the confirmed date as soon as it is finalized. As with the previous open house, we will notify all property owners within a certain radius of the full project area.
2/9/2026	Matt Burmeister	Energy Project Solutions - Regl Email Outgoing	Project Information &	Mr. Burmeister emailed asking to confirm SRP's current plan for how the major components will be delivered, specifically whether any portions are expected to be self-built versus procured from third parties? If third-party procurement is anticipated, could you clarify which portions (e.g., solar, BESS, gas generation, substation, transmission) and whether SRP expects to source those through an upcoming All-Source RFP or a separate solicitation? If an RFP is planned, I'd also appreciate any clarification you can share on the expected contracting structure (e.g., PPA, build-transfer/build-own-transfer, EPC, or another approach). Key questions and discussion points from Ak-Chin leadership included: •Water Usage: What is the water usage and source of supply for the project? •Proximity: How close will the gas turbines be to nearby residences? •Noise Impact: What are the anticipated noise impact relative to nearby residences? •Solar Component: What are the land requirements and vegetation considerations, and how would damaged panels would be managed and disposed of. •Air Emissions: What is the anticipated emissions profile, what pollutants are expected, and what are the potential air quality impacts? Ak-Chin Indian Community maintains its own EQ. •Emergency Response: What emergency contact and coordination protocols will be in place for the Marigold Energy Center? •Airspace/Flight Safety: Will there be coordination related to air flight control and safety considerations? •Operations: What staffing and operational oversight will be in place for each generation component? •Cultural Resources: Requests for copies of the cultural resources studies, including land classification documentation and the Class III cultural resources study. •Environmental Concerns: What mitigations measures are planned to endangered species and migratory birds?	L. Sjoberg emailed back explaining an overview of basic project plans and advised we are currently still in the preliminary stages of planning and design, therefore it is premature to share a timeline or construction information at this time. For general project information, provided the project website link. Also, added if you wish to do business with SRP, please visit SRP Construction Services website with provided link. G. Salt and A. Laurence provided a project over to Ak-Chin Indian Community tribal leadership and staff (Cultural Resources, Environmental Programs, and Community Development & Planning). The discussion included both the thermal generation and transmission components of the project, as well as solar development. Overall, leadership expressed interest in understanding environmental impacts, cultural resource protections, and operational safeguards associated with the project. Follow-up meetings as the project progresses were requested.
2/12/2026	Ak Chin Indian Cc Tribal Leadership and Staff	Meeting	Project Update		
3/10/2026	Nancy Smith	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Mayor Smith for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Vincent Manfredi	City of Maricopa	Email Outgoing	Open House Invite	P. Diross emailed an invitation to Vice Mayor Manfredi for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Eric Goettl	City of Maricopa	Email Outgoing	Open House Invite	P. Diross emailed an invitation to Councilmember Goettl for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Annamarie Knorr	City of Maricopa	Email Outgoing	Open House Invite	P. Diross emailed an invitation to Councilmember Knorr for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Amber Liermann	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Liermann for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Bob Marsh	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Marsh for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Henry Wades	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Wades for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Benjamin Bitter	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Bitter for the in-person and virtual open houses being held on March 25 and March 31, 2026.

3/10/2026	Jennifer Brown	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Asst. City Manager Brown for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Matt Kozlowski	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Deputy City Manager Kozlowski for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Katy Proctor	City of Maricopa	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to K. Proctor for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Lisa Fitzgibbons	City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Mayor Fitzgibbons for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Brent Bedillon	Mayor Pro-Term, City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to B. BeDillon for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Matt Herman	CG Councilmember	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Herman for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Anthony Edwards	City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Edwards for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Bob Huddleston	City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Huddleston for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Sean Dugan	City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Dugan for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Rebecca Romo	City of Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Councilmember Romo for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Larry Rains	Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to City Manager L. Rains for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Dan Coxworth	City of Casa Grande - Planning	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to Deputy City Manager Coxworth for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Kevin Louis	Casa Grande	Email Outgoing	Open House Invitation	P. Diross emailed an invitation to K. Louis for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Jan Vieane	Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/10/2026	Todd Sanders	Greater Phoenix Chamber	Email Outgoing	Open House Invitation	J. Mayer emailed an invite for the in-person and virtual open houses being held on March 25 and March 31, 2026 - shared postcard.
3/10/2026	Danny Seiden	Arizona Chamber of Commerce	Email Outgoing	Open House Invitation	J. Mayer emailed an invite for the in-person and virtual open houses being held on March 25 and March 31, 2026 - shared postcard.
3/10/2026	Jeff Serdy	Pinal County Board of Supervisors	Email Outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Connie Van Driel	District Admin- District 5, Pinal County	Email Outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Leo Lew	Pinal County	Email Outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Himanshu Patel	Town of Florence	Email outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Dedrick Denton	Interim Associate Director for Community Development	Email Outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Todd Williams	Deputy Director Community Development	Email Outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Joe Ortiz	Managing Director of Development	Email outgoing	Open House	L. Brady SRP sent email about upcoming Marigold Open House on March 25 and March 31, 2026.
3/10/2026	Rich Vitiello	Pinal County Supervisor District 1	Email Outgoing	Open House Invitation	L. Brady emailed an invite to R. Vitiello for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Barry Goldman	District Administrator - District 1	Email Outgoing	Open House Invitation	L. Brady emailed an invite to B. Goldman for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Mike Goodman	Pinal County	Email Outgoing	Open House Invitation	L. Brady emailed an invite to M. Goodman for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Haylie Studebaker	Pinal County Assistant to the Board of Supervisors	Email Outgoing	Open House Invitation	L. Brady emailed an invite to H. Studebaker for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Steve Miller	Pinal County Board of Supervisors	Email Outgoing	Open House Invitation	L. Brady emailed an invite to S. Miller for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Brandon Gaylord	District Administrator - District 1	Email Outgoing	Open House Invitation	L. Brady emailed an invite to B. Gaylord for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Carole Hooper	Administrative Specialist - District 1	Email Outgoing	Open House Invitation	L. Brady emailed an invite to C. Hooper for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Jeff McClure	Pinal County Supervisor, District 1	Email Outgoing	Open House Invitation	L. Brady emailed an invite to J. McClure for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Trecia Koozer	Pinal County, District 4	Email Outgoing	Open House Invitation	L. Brady emailed an invite to T. Koozer for the in-person and virtual open houses being held on March 25 and March 31, 2026, project website was also shared.
3/10/2026	Courtney Coolidge	Arizona Chamber of Commerce	Email Outgoing	Open House	J. Mayer emailed to invite to Marigold open house on March 25 and March 31, 2026.
3/10/2026	Kelly Anderson	Greater Maricopa Business Alliance	Email Outgoing	Open House	J. Mayer emailed to invite to Marigold open house on March 25 and March 31, 2026
3/10/2026	Renee Louzon	Casa Grande Chamber of Commerce	Email Outgoing	Open House	J. Mayer emailed to invite to Marigold open house on March 25 and March 31, 2026.
3/12/2026	Ak-Chin Tribal Leadership	Ak-Chin Tribal Leadership	Meeting		G. Salt met with Ak-Chin leadership to brief on the Marigold Energy Center. Topics included: water usage, noise, air emissions, emergency response, cultural resources.
3/16/2026	Susan Buonsante	Realtor	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.

3/16/2026	Tena Dugan	Resident	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Jennifer Murrieta	Resident	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Lenore B	resident	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Rich Vitiello	Pinal County Supervisor Dist. 1	Email outgoing	Ope House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	JDS realty	realtor	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Dave Klingensmit	Community Member	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Robin Davis	Resident	Email outgoing	Open House	C. Hallows emailed the invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026, also shared project website and PI contact information.
3/16/2026	Kathy Andrysiak	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Brandy Shuman	Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Jeff Flemming	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Phil Kaiser	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Raina Johnson	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Joe Rodriguez	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Connie Gabriel	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Rob Knorr	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Tom Scott	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	trent rustan	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Paul Ollerton	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Bryan Hartman	ED3 Board of Directors	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Jesse Cherry	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Esmeralda Tapia	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Lorraine Showalt	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Damian Murrieta	Damian Farm	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Gregory Witmer	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Jadee Rohner	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Alan Reese	Member, Synadase Farms LLC	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Buck Spears	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/16/2026	Brian Lynch	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on March 25 and March 31, 2026.
3/20/2026	Robert Vizzerra	Resident	Phone call outgoing	Project Information	R. Vizzerra owns some land near I8 and Stanfield Rd and wanted to know how close our project was to his land. C. Hallows gave the general location and invited R. Vizzerra to attend the open house. He stated he had been sick and likely wouldn't be able to attend. She offered to mail him some materials instead.
3/23/2026	Dan Mikalacki	Resident	Phonecall Outgoing	Project Information	D. Mikalaki owns 80 acres on Stanfield rd and Carranza rd, north of I8. He wanted information on the open house. S. Hoopingarner gave general information on the project and provided the details for the open house event.
3/24/2026	Robert Vizzerra	Resident	Mail Outgoing	Open House Materials	C. Hallows mailed the open house materials to Mr. Vizzerra
3/30/2026	Dennis Featherstr	Resident Parcel #500-15-015	Call Incoming	Open House & Projec	Dennis & Arlene own parcel #50015015 - they received postcard cannot attend virtual open house wants more information. C. Hallows gave a general overview and offered to mail open house presentation.

				Shamrock attendees: Carrie Ryerson, Kent McClelland, Devon McClelland, Keeley Smith, Mark Engdahl, Doug Hubby, Patrick Greiner	SRP attendees: Maribeth Klein, Ken Lee, Nina Mullins, Alexis Laurence, William Loper, Michael O'Connor
3/31/2026	Shamrock Farms Dairy		Meeting	Noise and Heat Conc	SRP reviewed and presented several of the open house boards and provided a project overview to Shamrock attendees. Shamrock appreciated SRP engaging with them and look forward to additional opportunities to provide input in the design of the solar facilities. SRP plans to gather additional information and share with Shamrock regarding the heat study, water use, tower heights and site plan (when available).
4/1/2026	Dennis Featherstr	Resident Parcel #500-15-015	Mail Outgoing	Open House	C. Hallows mailed open house materials.
				J. Feenstra emailed weed control invoice. Also questioned - SRP has bought a lot of farm ground around the Stanfield area, and it will be sitting fallow until construction begins. Are there farms that SRP would want to lease to keep in farm production until construction begins? Is there a contact that we could talk to?	C. Hallows responded she shared the info with the Property Manager, in case an opportunity comes up to lease; she is processing the payment for invoice. Also, notified that there will be another open house in June/July (still in the planning stages) to attend; provided project website.
4/29/2026	Jake Feenstra	Desert Cross Farms	Email Outgoing	Weed Control / Open	C. Hallows emailed: I am reaching out to you today to make sure that you are aware of a proposed project in your area. SRP is proposing the Marigold Energy Center, which is a mixed generation and storage facility designed to meet near-term energy and capacity needs in central Arizona. The proposed project includes a 230 kV substation, approximately 4 miles of new 230kV transmission lines, natural gas and solar generation, as well as battery storage. To support community engagement, SRP has hosted 2 in person and 2 virtual open houses to date, with additional opportunities currently in development.
5/15/2026	David Feenstra	Landowner	Email Outgoing	Project Information	Included project map and contact information. Provided project website:Marigold Energy Center SRP C. Hallows emailed: I am reaching out to you today to make sure that you are aware of a proposed project in your area. SRP is proposing the Marigold Energy Center, which is a mixed generation and storage facility designed to meet near-term energy and capacity needs in central Arizona. The proposed project includes a 230 kV substation, approximately 4 miles of new 230kV transmission lines, natural gas and solar generation, as well as battery storage. To support community engagement, SRP has hosted 2 in person and 2 virtual open houses to date, with additional opportunities currently in development.
5/15/2026	T&K Dairy	Property Owner	Email Outgoing	Project Information	Included project map and contact information. Provided project website:Marigold Energy Center SRP C. Hallows emailed: I am reaching out to you today to make sure that you are aware of a proposed project in your area. SRP is proposing the Marigold Energy Center, which is a mixed generation and storage facility designed to meet near-term energy and capacity needs in central Arizona. The proposed project includes a 230 kV substation, approximately 4 miles of new 230kV transmission lines, natural gas and solar generation, as well as battery storage. To support community engagement, SRP has hosted 2 in person and 2 virtual open houses to date, with additional opportunities currently in development.
5/15/2026	Edward Tellez	Owner	Email Outgoing	Project Information	Included project map and contact information. Provided project website:Marigold Energy Center SRP C. Hallows emailed: I am reaching out to you today to make sure that you are aware of a proposed project in your area. SRP is proposing the Marigold Energy Center, which is a mixed generation and storage facility designed to meet near-term energy and capacity needs in central Arizona. The proposed project includes a 230 kV substation, approximately 4 miles of new 230kV transmission lines, natural gas and solar generation, as well as battery storage. To support community engagement, SRP has hosted 2 in person and 2 virtual open houses to date, with additional opportunities currently in development.
5/15/2026	Robert Allen	Owner	Email Outgoing	Project Information	Included project map and contact information. Provided project website:Marigold Energy Center SRP C. Hallows left VM: Calling to ensure that he was aware of the proposed project and left contact info in case he has questions.
5/22/2026	Dale Button	Resident	Phone call outgoing	Project Information	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Rich Vitiello	Pinal County Supervisor Dist. 1	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Barry Goldman	District Administrator - District	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Mike Goodman	Pinal County	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Haylie Studebake	Pinal CountyAssistant to the Bi	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Steve Miller	Pinal County Board of Supervis	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Brandon Gaylord	District Administrator - District	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Carole Hooper	Administrative Specialist - Dist	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.

7/9/2026	Jeff McClure	Pinal County Supervisor, Distri	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Trecia Koozer	Pinal County, District 4	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Jeff Serdy	Pinal County Board of Supervis	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Connie Van Driel	District Admin- District 5. Pina	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Leo Lew	Pinal County	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Himanshu Patel	Town of Florence	Email Outgoing	Open House Invitations	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Dedrick Denton	Interim Associate Director Cor	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Todd Williams	Deputy Director Community D	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Joe Ortiz	Managing Director of Developr	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/9/2026	Harvey Krause	Pinal County	Email Outgoing	Open House Invitation	L. Brady emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Nancy Smith	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Vincent Manfredi	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Eric Goettl	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Annamarie Knorr	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Amber Liermann	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Bob Marsh	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Henry Wades	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Benjamin Bitter	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Jennifer Brown	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Matt Kozlowski	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Katy Proctor	City of Maricopa	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Lisa Fitzgibbons	City of Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Brent Bedillon	Mayor Pro-Term, City of Casa C	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Matt Herman	CG Councilmember	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Anthony Edwards	City of Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Bob Huddleston	City of Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Sean Dugan	City of Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Rebecca Romo	City of Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Larry Rains	Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Dan Coxworth	City of Casa Grande - Planning	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/10/2026	Kevin Louis	Casa Grande	Email Outgoing	Open House Invitation	P. DiRoss emailed the invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026, also shared project website and PI contact information.
7/14/2026	Greater Phoenix Chamber of Commerce		Email Outgoing	Open House Invitation	J. Mayer emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/14/2026	Arizona Chamber AZ Chamber		Email Outgoing	Open House Invitation	J. Mayer emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/14/2026	Maricopa Busines Maricopa Business Alliance		Email Outgoing	Open House Invitation	J. Mayer emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.

7/14/2026	Casa Grande Cha Casa Grande	Email Outgoing	Open House Invitation	J. Mayer emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026. C. Ryerson met with SRP M. O'Connor, N. Mullins, B. McClellan and A. Laurence. A. Laurence emailed to follow up this meeting thanking for the opportunity to meet with Shamrock team to discuss project. SRP noted a few questions during the discussion and prepared the attached letter with additional information for her review. SRP have also continued to make progress on design and siting efforts and look forward to meeting with her in the coming weeks if her schedule allows. Also invited to upcoming in-person open house on July 28th and a virtual open house on July 29th. Shared Project website.
7/15/2026	Carrie Ryerson Shamrock	Email Outgoing	Project Update	
7/17/2026	Esmeralda Tapia Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Damian Murrieta Damian Farm	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Jadee Rohner Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Buck Spears Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Brian Lynch Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Sara Carroll Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Laura Biggs Archu Community Member	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Susan Buonsante Realtor	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Tena Dugan Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Jennifer Murrieta Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Lenore B resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Rich Vitiello Pinal County Supervisor Dist. 1	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	JDS realty realtor	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Dave Klingensmit Community Member	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Jan Vieane Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Brandy Shuman Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Robin Davis Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Maryeileen Flanagan Rainfire Stables	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Eric Goettl City of Maricopa	Email outgoing	open house	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Rick DeVore Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Kade Coffey Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Lori Sharp Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Doug Cole Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Ed Wedman Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Gary A. Metivier Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Monica Spencer Reporter with In Maricopa	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Magdalena Howa Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Sam English Resident	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Clara Zusi Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Gabor Szogyenyi Resident	Email outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Richard Sigler Community Member	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Henry Yun Epic Star Energy	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Robert Allen Owner	Email Outgoing	Open House	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Edward Tellez Owner	Email Outgoing		C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Tracy Wind Ak-Chin	Meeting		Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.
7/17/2026	Reyllynne William: Gila River Indian Community (	Meeting		Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.
7/17/2026	Shane Anton Salt River Pima Maricopa India Meeting			Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.
7/17/2026	Sunday Elsett Salt River Pima maricopa India Meeting			Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.
7/17/2026	David Tenario Tohono O'odham Nation	Meeting		Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.

7/17/2026	Samuel Fayuant	Tohono O'odham Nation	Meeting		Four Southern Tribes Working Group Meeting. Attendees: SRP, GRIC, SRPMIC, TON, ACIC, NextEra. Topics included: fire, water, noise, air quality, heat effects, solar decommissioning, BESS, gas generation. The group was receptive and no opposition to the project was expressed.
7/17/2026	Jeff Flemming	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Phil Kaiser	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Raina Johnson	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Joe Rodriguez	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Connie Gabriel	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Rob Knorr	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Tom Scott	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	trent rustan	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Paul Ollerton	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Bryan Hartman	ED3 Board of Directors	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Jesse Cherry	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Lorraine Showalter	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Gregory Witmer	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Alan Reese	Member, Synadase Farms LLC	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/17/2026	Kathy Andrysiak	Resident	Email Outgoing	Open House Invitation	C. Hallows emailed invitation for the in-person and virtual open houses being held on July 28 and July 29, 2026.
7/20/2026	Tracy Wind	Ak-Chin	Email outgoing		Email follow up from discussion at the Four Tribes Working Group meeting. Attached in the email were documents on topics that included: heat island study, solar and battery mythbuster, battery technology safety.
7/21/2026	Jake Feenstra	Desert Cross Farms	Email Incoming	Inquiring if SRP has land in Stanfield to lease for farming.	C. Hallows responded that we expect construction to start fairly quickly and all other existing leases are expiring as well. However, if anything changes we will keep this request in mind. Also mentioned the project opne house taking place next Tuesday.
7/21/2026	Eloy Chamber of Commerce	Eloy Chamber of Commerce	Email outgoing		J. Mayer emailed the Marigold open house invitation.
7/21/2026	Coolidge Chamber of Commerce	Coolidge Chamber of Commerce	Email outgoing		J. Mayer emailed the Marigold open house invitation.
7/28/2026	Seth Keeler	Vanderbilt Farms / Landowne	Call Incoming	Open House Informat	Seth stated he missed tonight's virtual open house and has a few questions C. Hallows returned the call to let him know that tonight is the virtual so he did not miss it. Last night was the in person.
7/30/2026	Jake Feenstra	Desert Cross Farms	Email outgoing		C. Hallows sent an email to J. Feenstra: Hi! I noticed that somebody with your last name signed in at the open house on Tuesday, but I didn't get a chance to chat with him! I know your family owns a few homes (and of course the farmland) near the proposed gas generation site. Do you/your family want to meet and discuss the project, and any potential mitigations SRP can provide?
7/31/2026	Jake Feenstra	Desert Cross Farms	Email Incoming	Jake said he and his family would like to take us up on the offer to meet and discuss the project.	C. Hallows asked for some dates and times that would work for them and she will coordinate on SRP's end to get a meeting scheduled.
8/2/2026	Maryeileen Flanagan	Rainfire Stables	Email Outgoing	Water Use	M. Flanagan emailed: I just read the water comparisons from this project and I want to point out a HUGE fallacy in your computations of water use by alfalfa farming and your plant. This is a quote from the "In Maricopa" article: SRP estimates that local alfalfa farming uses approximately four acre-feet of water per agricultural acre. Alfalfa may use four acre feet of water at the onset, but remember that baled alfalfa only contains 18% to 14% water. The rest returns to the aquifer. This is according to a U of A study on the economics and farming of alfalfa. "Moisture (water content) in a bale of alfalfa hay averages 14% to 18%. All remaining water used to grow the alfalfa returns to the ever-regenerating hydrological cycle." According to my calculator, that means SRP should only be using .72 acre feet of water if they want to be commiserate with alfalfa farming. (Source: Source: 2023 U of A Economics of Arizona Alfalfa Study.) For you to disregard the amount of water that is reabsorbed by farming is rather misleading. I urge you to reconsider your calculations and design a more efficient use of our very limited water supply in the Stanfield/Hidden Valley area. C. Hallows responded via email: Thank you for your email and for taking the time to share your concerns. We appreciate the distinction you are making between water applied to agricultural production and water that may return to the hydrologic system. Water use comparisons can be complex, particularly when considering factors such as return flows, recharge, and consumptive use. The comparison referenced in the article was intended as a high-level comparison of water demand associated with different land uses and was based on commonly cited estimates for alfalfa irrigation in Arizona. It was not intended to be a detailed consumptive use analysis or to suggest that all water applied to alfalfa is permanently removed from the hydrologic system. It is also important to note that energy facilities and agricultural operations use and interact with water differently, making direct comparisons challenging. The purpose of the comparison was simply to provide readers with a general frame of reference regarding the scale of water demand associated with different types of land use.
8/5/2026	Jake Feenstra	Desert Cross Farms	Email Incoming		We appreciate your feedback and your concern for responsible water management in the Stanfield area. Thoughtful discussion about water use is important, and we value the opportunity to clarify the intent of the statement.

I am writing as an SRP customer to ask that the Board carefully consider the natural gas component of the proposed Marigold Energy Center before casting a final vote on September 14th.

I support the solar and battery storage components of this project. They represent exactly the kind of clean, affordable, water-smart energy investment Arizona needs. But I have serious questions about the addition of up to 675 megawatts of new natural gas infrastructure, and I urge the Board to demand answers before moving forward.

Specifically, I would like the Board to ask SRP Management:

- 1) Has SRP conducted a full cost comparison between the natural gas component and equivalent clean energy alternatives including the cost of building the infrastructure and fuel costs over the lifetimes of both?
- 2) How much water will the Marigold Energy Center require in total and how does that break down between the solar, battery storage, and natural gas components?
- 3) Has SRP fully evaluated whether solar and battery storage alone could meet the same capacity needs on a comparable timeline?

Arizona families already pay the highest summer utility bills in the country. Natural gas prices are volatile and the costs are passed directly to ratepayers. Before committing to decades of new gas infrastructure, I urge the Board to ensure that all alternatives have been fully and transparently evaluated.

8/5/2026 Cheryl Vana

Email incoming

Opposition Marigold Thank you for your service to SRP's customers and for your consideration of

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8/5/2026 Nancy Heintz

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8/5/2026 Geoff Drum	Email Incoming Opposition Marigold Thank you for your service to SRP's customers and for your consideration of I am writing as an SRP customer to ask that the Board carefully consider the natural gas component of the proposed Marigold Energy Center before casting a final vote on September 14th. I support the solar and battery storage components of this project. They represent exactly the kind of clean, affordable, water-smart energy investment Arizona needs. But I have serious questions about the addition of up to 675 megawatts of new natural gas infrastructure, and I urge the Board to demand answers before moving forward. Specifically, I would like the Board to ask SRP Management: 1) Has SRP conducted a full cost comparison between the natural gas component and equivalent clean energy alternatives including the cost of building the infrastructure and fuel costs over the lifetimes of both? 2) How much water will the Marigold Energy Center require in total and how does that break down between the solar, battery storage, and natural gas components? 3) Has SRP fully evaluated whether solar and battery storage alone could meet the same capacity needs on a comparable timeline? Arizona families already pay the highest summer utility bills in the country. Natural gas prices are volatile and the costs are passed directly to ratepayers. Before committing to decades of new gas infrastructure, I urge the Board to ensure that all alternatives have been fully and transparently evaluated.	
8/5/2026 Catherine Williams	Email Incoming Opposition Marigold Thank you for your service to SRP's customers and for your consideration of	

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8/5/2026 Nicole McGrath

Email Incoming

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8/5/2026 Phillip Ritter

Email incoming

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8/5/2026 David Walker

Email Incoming

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8/5/2026 Tracy Cole

Email Incoming

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8/5/2026	Barbara Smith	Email incoming	Opposition Marigold	Thank you for your service to SRP's customers and for your consideration of
		Will Read This, I am writing to strongly oppose the Marigold Energy Center. I urge you to stop this project immediately and to stop misleading the public with claims that this facility represents "clean energy" or "efficient" power. The reality is that what you are pushing is neither clean in practice nor efficient in the way you advertise it, and the public deserves honest—not marketing language that treats people like they are too uninformed to ask questions. For years, the same pattern has repeated: companies and public facing officials present a polished narrative while avoiding the uncomfortable details. The message is always that the technology is "clean," that the transition is "progress," and that the benefits are obvious. But the public statements do not match the lived outcomes—especially for residents in Arizona who are expected to bear the costs, disruptions, and long-term impacts. Your materials claim solar is clean. But "clean" should mean something measurable: real reductions in pollution, transparent accounting of environmental harm, and clear reporting of performance and impacts over time. What we see instead is a one-sided story—one that ignores what it takes to build and maintain these systems, the land and habitat disruption involved, the waste streams created during manufacturing and end-of-life, and the reality that energy planning built on unreliable generation is not the same as reliable, responsible power for communities. "Solar" is not automatically clean just because it has the word "renewable" attached to it. If the full impacts and performance are hidden, softened, or selectively presented, then the public is being lied to. You also claim efficiency. Yet "efficiency" cannot be reduced to slogans or short-lived snapshots. Efficiency means performance when the system is under real conditions, including heat, seasonal variation, grid constraints, and how the power is delivered when people actually need it. The public should not be sold an incomplete picture that assumes ideal		
8/5/2026	Carlos Hernandez	Web Site Comment		
8/3/2026	Ginger Ritter	AZGFD	Virtual Meeting	AZGFD Consultation
		SRP, Next Era and AZGFD representatives met to discuss plans for the Marigold Energy Center. AZGFD has commented in their consultation letter previously. AZGFD glad to see Burrowing Owl Exclusion Zones in Solar area and appreciated extra consultation and presentation. No action items for follow up.		

EXHIBIT J-2B
LETTERS OF SUPPORT



August 7, 2026

Arizona Corporation Commission
1200 W Washington St
Phoenix, AZ 85007

Re: Support for the Marigold Energy Center Project

Dear Chairman Myers and Commissioners:

On behalf of the Greater Phoenix Chamber, I am writing to express our support for Salt River Project's (SRP) planned Marigold Energy Center near Stanfield, Arizona. We urge the Arizona Corporation Commission to recognize the project's importance to the state's continued economic growth. As one of the nation's fastest-growing regions, Greater Phoenix depends on reliable, affordable and diverse energy resources to support business expansion, job creation and long-term economic competitiveness throughout all of Arizona. The Marigold Energy Center represents a forward-looking investment that will help ensure Arizona has the energy infrastructure necessary to meet rising demand while supporting continued growth across Maricopa and Pinal counties.

As we have previously stated, Arizona's energy needs are increasing at an unprecedented pace. SRP projects annual peak demand growth of 5.7 percent, nearly double its historical growth rate, driven by population growth, advanced manufacturing, and other energy-intensive industries that are critical to Arizona's economic future. To meet this demand, SRP plans to more than double its generation capacity by 2035 while continuing to improve and modernize the system. These investments are essential to maintaining the reliability and affordability that businesses and residents expect, particularly during Arizona's extreme summer conditions.

The Marigold Energy Center is an important part of that strategy. The planned project includes approximately 600 megawatts of solar generation, 400 megawatts of battery storage, up to 675 megawatts of natural gas generation, approximately 4.5 miles of 230kV transmission lines, a new 500kV substation and new collector substations. This balanced mix of resources reflects an all-of-the-above approach that recognizes the need for carbon-free energy, storage capacity and flexible, dispatchable generation to maintain grid reliability during periods of high demand.

From a business perspective, this approach is practical and necessary. Solar and battery storage will help address SRP's near-term resource needs with carbon-free energy, while flexible natural gas units will provide dependable capacity during peak demand, back up intermittent resources and strengthen overall resource adequacy. Together, these assets will help protect the reliability of the grid and manage costs for employers, families and communities throughout the region and aligns with Arizona's "all of the above" approach to energy generation.

The Chamber is grateful for SRP's commitment to serving and supporting local communities. When complete, the Marigold Energy Center will provide flexible, dispatchable capacity to

support growing customer needs in Maricopa and Pinal counties. SRP's partnership discussions with Electrical District No. 3, which serves Maricopa, Stanfield and the surrounding area, reflect the project's potential to support regional energy needs and local economic development. SRP's coordination with the Fire and Risk Alliance to plan for emergency management and provide fire safety information further demonstrates a responsible approach to project development.

Reliable and affordable energy is foundational to Arizona's economic success. The Marigold Energy Center will help meet growing demand, strengthen grid reliability, support business expansion and advance responsible energy planning for the region. For these reasons, the Greater Phoenix Chamber respectfully requests the Arizona Corporation Commission to support approval and advancement of the Marigold Energy Center Project.

Sincerely,

A handwritten signature in black ink, reading "Todd Sanders". The signature is written in a cursive, flowing style.

Todd Sanders
President & CEO



Greater Maricopa Business Alliance
19756 N Maricopa Rd, Ste 100
Maricopa Az, 85139
520-586-9576 | www.greatermaricopa.org

August 8, 2026

Dear Commissioners:

On behalf of the Greater Maricopa Business Alliance (GMBA), I am writing in support of Salt River Project's proposed Marigold Energy Center near Stanfield, Arizona.

Greater Maricopa and Western Pinal County are experiencing significant population and economic growth. Supporting that growth requires reliable infrastructure that keeps pace with new businesses, employers, housing, and commercial development. Reliable and affordable energy is fundamental to attracting investment, creating jobs, and maintaining our region's economic competitiveness.

The Marigold Energy Center represents an important investment in that future. Its combination of solar generation, battery storage, natural gas generation, and supporting transmission infrastructure provides a balanced approach to meeting growing demand while maintaining dependable capacity during peak periods.

For our business community, infrastructure must anticipate economic development, not simply respond to it. Businesses considering investment in Western Pinal County need confidence that sufficient energy capacity will be available to support their operations and future growth.

We also value SRP's partnership with Electrical District No. 3 and its commitment to responsible water stewardship in the Pinal Active Management Area. Regional collaboration and thoughtful resource management are essential as our communities continue to grow.

Western Pinal County is positioned to play an increasingly important role in Arizona's economic future. For these reasons, GMBA respectfully supports the Marigold Energy Center and asks the Arizona Corporation Commission to give favorable consideration to the project and its associated infrastructure.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kelly Anderson', is positioned above the printed name.

Kelly Anderson
Executive Director
Greater Maricopa Business Alliance

EXHIBIT J-3
PUBLIC MEETING MATERIALS

EXHIBIT J-3A
PHASE 1

Marigold Open House #1 Summary

SRP hosted the first in a series of Open Houses for the Marigold Energy Project at Stanfield Elementary School on December 10, 2025, from 5:00 to 7:00 p.m. Partnered with ED3, SRP engaged the community and received feedback. There were 26 participants throughout the evening.

Project stations included:

- Project Overview
- Engineering & Construction
- Environmental, Siting & Regulatory Process
- Interactive GIS Station (To map stakeholder location in comparison to project location)
- Siting Considerations*
- Survey & Comment Area
- Kids Zone

At each of these stations comments and questions were gathered in real time during discussions with stakeholders on flipcharts to capture their concerns and needs.*

Community members raised concerns including property value, fire safety, livestock safety, noise, air quality, aesthetics, and water resources. However, they valued the opportunity to share their perspectives on the project.

We received 4 comment cards and 2 surveys.*



*Siting considerations

Siting Considerations: Natural Gas Generation

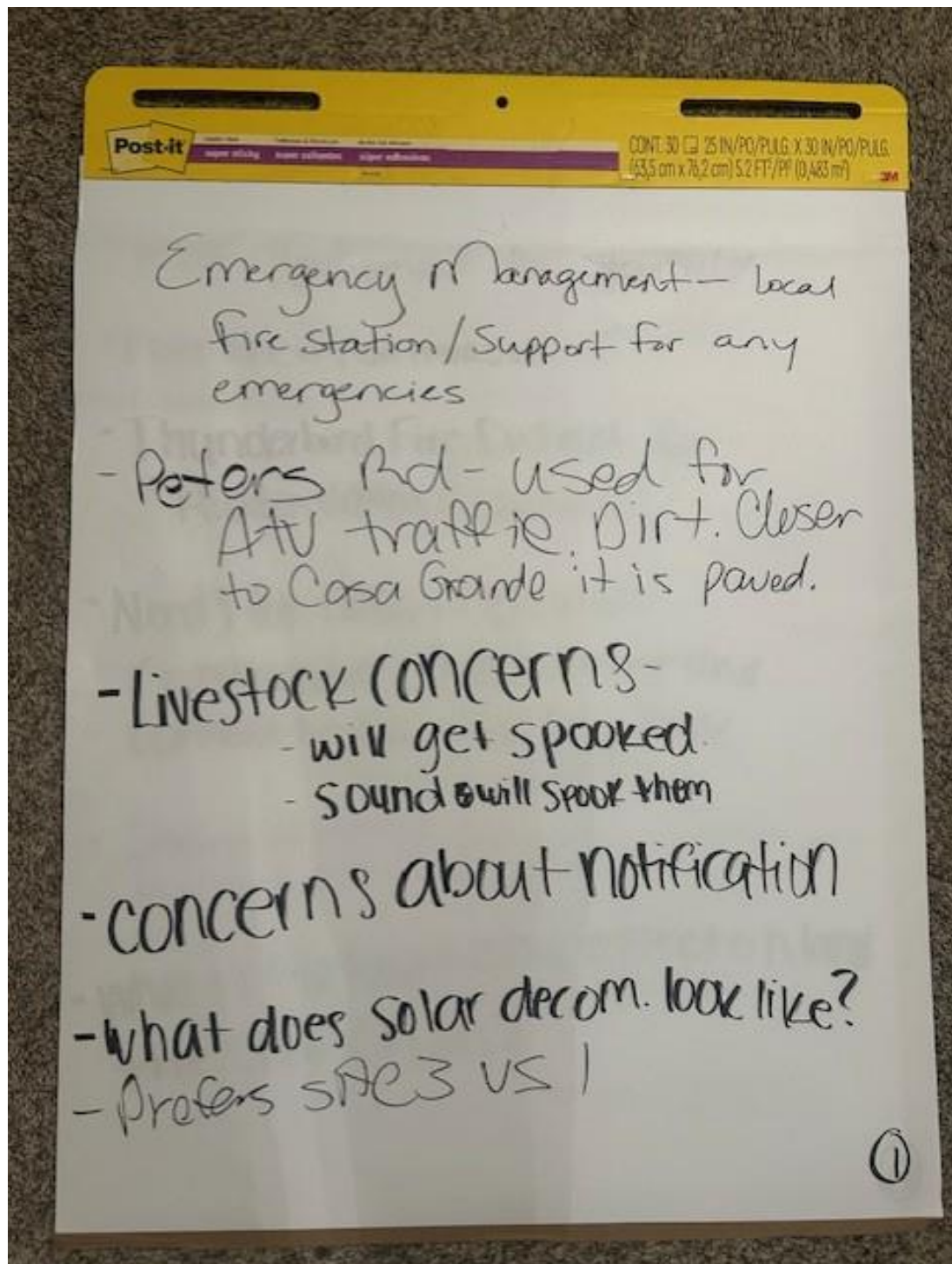
Please add stickers for the siting considerations that are important to you.

Considerations	Site 1	Site 2
Biological Resources	● ● ●	
Threatened & Endangered Species	● ● ● ● ● ● ●	● ● ●
Special Status Species	● ● ● ● ●	● ● ● ● ●
Bald & Golden Eagles	● ● ●	● ● ●
Vegetation		●
Wetlands		
Aquatics	●	●
Cultural Resources		
Visual & Aesthetics	● ● ● ● ●	●
Recreation	●	●
Constructability		
Construction Timing		
Construction Costs		
Operation & Maintenance Access		
Operation & Maintenance Safety	●	●
Distance from Homes	● ● ● ● ● ● ●	● ● ● ● ● ● ●
Other:	● ● ● ● ●	●



Site 1	Site 2
Threatened & Endangered Species-6	Special Status Species-3
Distance from Homes-4	Distance from Homes-3
Visual & Aesthetics-4	Bald & Golden Eagles-2
Biological Resources-3	Threatened and endangered Species-2
Special Status Species-3	Vegetation-1
Other-3	Aquatics-1
Bald & Golden Eagles-2	Visual & Aesthetics-1
Operation & Maintenance Safety-1	Operation & Maintenance Safety-1
Recreation-1	Recreation-1
Aquatics-1	Other-1

*Comments Captured



Fire department for Stanfield

- Feel like it's an invasion.

- Thunderbird Fire District for
Hidden Valley (Volunteer)

- Needs for custom equestrian
communities, event center and
connect to Palo Verde Reg. Park

- Shortage of silver, rare earth minerals, will
there be enough for all this?

- What is the long term effect on land
the solar siting?

(2)

Higher value (commercial)
- underground line district for
- less risk of innovation

- Natural gas seems more feasible
- Underground vs overhead lines - Some people paying to underground elsewhere
- what does this do for rates (SRP + ED3)
- Property value concern
- aesthetics
- How does this project support this area? (Add or support to higher income indiv.)
- Water consumption concern

(3)

- DROUGHT CONCERN

- what does this do for water (256 + 2027)
- 2006 looking to implement changes
- 2012 - 2011 drought 12 months since - 2015

- minimum 200 acres water for crops

- If Solar does not go on site, what will be future ^{site} use?
- How is SRP working / collab w/ local agriculture?
- agrivoltaics
- RFI concerns
- light
- noise
- water use

(4)

- location of project

- SRP does not provide power here
- Partner with ALL Local power companies to keep power here (San Carlos, EDS, APS)
- Higher temps @/near solar sites impact CROPS → heat stress on plants
- Artificial high pressure concern
- Decreased enrollment @ school
- Loss of rural community
- Bypass of Local government to move straight to CORP commission.
Citizens lose voice.

- In Solar area Keep Row open
 - Selma Hwy
 - Peters Rd. } priorities
- Sponsor School Solar demonstration
Solar installation w/ curriculum
- Water consumption - minimize
 - SKR bringing water with them
- Community program for rooftop Solar
- what are Solar Setbacks → increase Setback
- Concern for pacemaker near Solar
- Flood control + ^{Storm} water management
- Too much in Pinal County
- Is there gas capacity,? pressure increase? @

Water as a resource Community Solar

- Visuals - can see far now
concerned about seeing stacks
- Construction traffic
- Heat index
- Air Quality — Location South of I-8
- Water Quality
- Property Value
- Low Cost Reliable Power
- Silver used for Solar
- RFI
- Light pollution
- Noise pollution

*Comment Forms & Surveys

Marigold Energy Center
Open House - Phase 1
Comment Form

Thank you for your interest in this Project. Please complete this form and provide any comments about the Project.

Please Print

Name: Robin Davis Phone: 619-884-8887
Address: 4629 N Warren Rd Maricopa 85139
Organization: _____
Email: robindavis11369@outlook.com

Comments: Please listen to the people/residents that
live nearby. If one is unhappy, you must
make them happy before you build.
Solar has too many issues.
what does de commissioning look like?
How toxic is Solar to the land?
I have heard the land is dead after panel
removal.
Please listen to the people who live
in this area with their concerns.
We feel like we are not being heard.

Thank you for your time and interest!

To learn more about this Project, visit www.srp.net/marigold



**Marigold Energy Center
Open House - Phase 1
Comment Form**

Thank you for your interest in this Project. Please complete this form and provide any comments about the Project.

Please Print

Name: Gary Phillips Phone: 480-594-0606

Address: 4269 N Warren Rd 85139

Organization: _____

Email: _____

Comments: Listen to the people in our area
about noise levels protect the live stock.
Pay attention to the water levels. What kind
of traffic will be affected.

Thank you for your time and interest!

To learn more about this Project, visit www.srp.net/marigold

Marigold Energy Center
Open House - Phase 1
Comment Form

Thank you for your interest in this Project. Please complete this form and provide any comments about the Project.

Please Print

Name: JEFF + Pam FLEMING Phone: _____

Address: PO Box 695, STANFIELD, AZ 85172

Organization: Individuals

Email: jp4948@yahoo.com

Comments: Major concern about nearby property values dropping.

Thank you for your time and interest!

To learn more about this Project, visit www.srp.net/marigold



John Burdett
Comments regarding SRP at Stanfield. 12-04-2025

1. Regarding Size: 5,000 acres is 7.8 square miles!

What is exact footprint of proposed project?

2. Regarding Lithium battery storage: Fire danger.

Water Source, is there enough? They can only replace existing wells. Not increase well numbers. What will be the effect on producing wells i.e. Stanfield. Water table at risk. What about AK Chins water table? Developers Lobby our government for less stringent water regulations and succeed! We have less water for agriculture and jobs and businesses suffer and close. We are in a prolonged extreme drought, Colorado river water is Critical and Arizona's share is probably going to be cut again. We live in a desert. Pumping ground water cannot continue forever. It is a finite supply and will get too deep to afford! True, under CAP water, the water table has crept back up a few inches in some areas, but not in adequate amounts.

3. Who will staff Fire protection and emergency personnel in case of a lithium fire or fuel fire on site 24/7? Stanfield Volunteer Fire is not trained nor equipped.
4. Regarding Air Quality: Smoke direction in case of a fire. Threat to Stanfield residents and Stanfield School. Turbine Exhaust.

5. Regarding noise pollution: Exactly how many Turbines on site. Coolidge has 16 with more planed.
6. Regarding backup fuel storage: How many fuel storage tanks will be required and how many gallons? Again, emergency fire protection and air pollution problems.
7. Regarding Loss of Property Value: Who wants to live where surrounded by miles of Solar panels? Look South and East of Coolidge and Randolph. There are already too many miles of panels and turbines in Pinal County!! They buy relatively cheap land in Pinal County because they cannot find land in Maricopa County and would be prevented from building a project of this size by residential pressure alone! Pinal county and Stanfield should not be a location of convenience for SRP. Their recent record demand for power is from locations from the north, not Pinal County.
8. Regarding possibly furnishing some power to ED3: Our rates would go up as the cost of that power would go towards paying for this project. They produce power as a business. They sell it for a profit to repay tax free bonds they issue periodically for operating capital. They simply want to develop more capacity to supply power for the projected building of the power and water hungry Data storage sites proposed for Pinal County and more people. "The evolving grid improves our ability to serve future economic development, like the expansion of high-tech

industries and data warehouses in the valley. The improved power reliability and expanded variety of energy sources helps to ensure future power system growth, continuing to fuel economic expansion in metropolitan Phoenix."

9. Regarding existing natural gas lines, they need to build connecting lines. Where? Will needed additional capacity influence the integrity of the existing gas line that runs diagonally through all of Stanfield?
10. Regarding flood mitigation. Standfield suffered a 100 year flood in 1983 and another one in 1994! The Santa Cruse river, the Green wash and the Santa Rosa wash all overflowed devastating Maricopa and the surrounding area. Federal law requires that no pollutants can leave your property and enter a waterway. What are their plans to prevent flooding of their lithium battery storage and turbine generation sites??

We want to hear from you!

Marigold Energy Center Project
Open House Feedback Form



Delivering water and power®

Name W. JEFF + PAMELA S. FLEMING
Organization N/A (INDIVIDUAL RESIDENTS)
Address PO BOX 695, STANFIELD, AZ 85172
Email Address jp4948@yahoo.com
Phone

Question 1. What do you understand as the benefits of this project?

HIGHER EMPLOYMENT LEVEL — SKILLED WORKERS.

Question 2. What do you understand as the challenges of this project?

NEED TO REACH COMPROMISE WITH LOCAL RESIDENTS.

Question 3. Do you generally support this project?

NO. AGAINST NATURAL ENVIRONMENT AND WILDLIFE, AND BEAUTY OF AREA. NO, ON ELEVATED FIXTURES.

Question 4. Is there a preference for a Natural Gas Plant site?

SITE 1.

Question 5. Do you see challenges with either Natural Gas site?

SITE 2 TOO NEAR TABLETOP WILDERNESS.

We want to hear from you!

Marigold Energy Center Project

Open House Feedback Form



Delivering water and power®

Name

Robin Davis / Gary Phillips

Organization

Address

4429 N Warren Maricopa 85139

Email Address

robindavis11369@aolhook.com

Phone

619-884-8887

Question 1. What do you understand as the benefits of this project?

more power to AZ residents

Question 2. What do you understand as the challenges of this project?

toxic to the land
no understanding of solar decommissioning

Question 3. Do you generally support this project?

mixed, we need power but at what cost?
Down ruin the beauty of Arizona & destroy it?

Question 4. Is there a preference for a Natural Gas Plant site?

I think along the gas line is appropriate

Question 5. Do you see challenges with either Natural Gas site?

unknown

Sign in

SRP Marigold Energy Center Open House
December 10, 2025

①

NAME	ADDRESS	E-MAIL	ORGANIZATION (IF APPLICABLE)
Phillip + Carmen Kaiser	PO Box 1071 Stanfield 85172	phlkaiser1980@yahoo.com	
Shreeth Dasi	16th E Ryan Pkwy	SK-Dasi@yahoo.com	SES
Kari Woodward E03			
Raina Johnson	465 N. Oakliff Dr. Oroville, AZ 85623	rain.g.johnson@gmail.com	
Machon Memmiller		machon.memmiller@capa-power.com	Capa Power
Joe Rodriguez	36,000 W. Lane Dr. Stanfield, AZ 85172	Vivian H03@gmail.com	
Dan Garcia	20322 Laurel Phoenix	dan.garcia@valleyspring.com	SAP
Claira + Jennifer Murrieta	8740 W. Edupse Rd. Stanfield, AZ 85172	murrieta.jennifer@gmail.com	Community member

②

SRP Marigold Energy Center Open House
December 10, 2025

②

NAME	ADDRESS	E-MAIL	ORGANIZATION (IF APPLICABLE)
Robin Davis	4629 N. Warren Rd. Maricopa, AZ 85139	robindavis11369@outlook.com	
Gary Phillips			
Kelly Anderson			GK438H
DAVE KINGSMITH	34560 W. Safford Way	DAVE.D.KINGSMITH@gsa.com	
Jack Ford	3610 N 44th St Suite 200	jford@satwaste.com	Satwaste Partners
Joe Bur	34560 W. Safford Way	joebur@satwaste.com	
Connie Gabriel	4412 W. Boca Rd. Maricopa, AZ	conniegabriel67@gmail.com	Personal
Emily Lester			SAP

③

SRP Marigold Energy Center Open House
December 10, 2025

③

NAME	ADDRESS	E-MAIL	ORGANIZATION (IF APPLICABLE)
Rob Knorr	Po Box 1260 Maricopa AZ 85139	rob@KnorrFarms.com	
JEFF + Pam FLEMING	Po Box 695 STANFIELD, AZ 85172		
TOM SCOTT	Po Box 2119 Coolidge AZ 85128	tomscott@ms equipment.com	
DALE BUTTOW	PO BOX 543 STANFIELD		
TRISTAN RUSTEN	2523 W. UNIVERSITY TOWN AZ STANFIELD	TRUSTAN@PIAZ.COM	
Brito Bunterio	PO BOX 362		
Jadee Rohner	PO Box 817, Stanfield AZ	jadeerohner@gmail.com	

*
double check on
mail list

⑧

SRP Marigold Energy Center Open House
December 10, 2025

④

NAME	ADDRESS	E-MAIL	ORGANIZATION (IF APPLICABLE)
Justin Smith	Maricopa Station Maricopa		
S. Mathew	35416 W. Miller Rd		
John Burdett	Po Box 427		

⑤

MEMORANDUM

Marigold Virtual Open House Summary

SRP hosted the first in a series of virtual open houses on December 18, 2025. William Loper (SRP) and Sarah Justus (KPE) provided a project overview presentation followed by a Q&A session.

Attendees: 28

Name (original name)	Email
Paul Ollerton	tvfarms0109@gmail.com
Bryan	bmhrancher@gmail.com
Chance	chancebaldy2010@gmail.com
Jesse Cherry	jesseleecherry.2020@gmail.com
Esmeralda Tapia	esmeralda1004@gmail.com
Lorraine Showalter	lorraine@sssolutions.us.com
C Baldwin	ruralhome@hotmail.com
Damian Farm iPhone	damian.murrieta@gmail.com
Gregory Witmer	gwit1@yahoo.com
Jadee Rohner	jadeerohner@gmail.com
AR Reese	stanfieldroad@yahoo.com
Nicole Clements	neichardson.kb@gmail.com
Buck Spears's 11 iPad Pro	buckspears@me.com
Kathy Andrysiak	kathrynanne.ka@gmail.com
Tom Scott	tomscott@msequipment.com
brian.yerges (Maricopa, AZ)	brian.yerges@ed-3.org
Brian Lynch	blynch@redwoodenergy.com
Susan	susan@bellapropertyboutique.co
Tena Dugan	tena.dugan@gmail.com
Jennifer Murrieta	murrieta.jennifer@gmail.com
lenore	lenoreb70@gmail.com
Rich Vitiello	rich4supervisor@gmail.com
Zoom user	jdsrealtor@gmail.com
Dave Klingensmith	dbl.dk.ranch@gmail.com
Jan	janvieane@gmail.com
Brandy Shuman	bashuman@lcmail.lcsc.edu
Dave Klingensmith	dbl.dk.ranch@gmail.com
Robin Davis	robindavis11369@outlook.com

Questions received: 49. Topics included public input, permitting, land use/agriculture, water usage, heat impact, community impact, fire safety, environment.

Concerns were expressed about the power generated staying in the Stanfield/Pinal County area, and the lack of a solid agreement with ED3. Water usage for the thermal generation and heat effects from solar panels were a common concern. Overall, the sentiment was cautious, concerned and skeptical, demanding more clarity.

These questions were shared with the virtual presenters and were answered verbally. The presentation and question responses emphasized the early nature of the public engagement process and stressed the importance of ongoing engagement at future public meetings and methods of providing public comment including the Project website, email and phone line. In addition, a QR code was provided to link to a feedback survey form.

Questions shown below exactly as written by the attendee.

1. Can people still comment after this webinar? And where?
2. SRP does not service Pinal County. Talking to eD3 and having an actual contract in place to have this energy go to Pinal County are two different things. Will you have a solid contract in place before moving forward with this or is this just words to get this project put in place
3. will this project go through Pinal County P&Z? If not why not?
4. How much water will be used for these 3 systems?
5. How many hours do the batteries store power?
6. It appears the NEED, or the PURPOSE of this project is to provide energy for the Pinal County Energy Growth? So, it's correct to assume 100% of the energy generated in Stanfield will stay in her? In Pinal County?
7. When are the future open houses scheduled for? Are they in person or virtual?
8. How many acres of farmland will be lost to this project?
9. who will be the fire protection and will they service the unincorporated area?
10. Who will provide fire service. This is all currently an area without fire protection other than volunteer
11. How much will these solar angels raise our temperature and how far out ?
12. Is the water used returned to the reservoir ? Is it contaminated ?
13. What happens in case of a toxic fire ?
14. What happens to our property value? How will we be compensated for reduction of our asset base?

15. Will the project offer capacity availability to the "Mid-Intensity Activity Center" properties at the intersection of I-8 and Stanfield Road as designated in the Pinal County Comprehensive Plan?
16. I'm doing regenerative and organic farming...how will this affect my soil and products and water?
17. Will there be visual screening walls on along Stanfield Road?
18. How can the County Board of Supervisors provide input, feedback, and raise local concerns?
19. Can you please state the streets making up the perimeter of the Marigold Energy Center?
20. Do you have plans to incorporate any other power providers besides ED3 such as SCIP?
21. As a resident and former SwGas employee, its a known fact new wells have be dug and SWGas has prepared this site with underground gas and reg station frastructue this past summer, why weren't we notified before the fact? Do we really have a say? The power transmission lines and gas generators towers a re eye sores and devalue our property. What can be done yo rectify or compensated for these issues?
22. "Please don't paraphrase this question. I'd like to know the percentage of energy that will stay here based of modeling.It appears the NEED, or the PURPOSE of this project is to provide energy for the Pinal County Energy Growth? So, it's correct to assume 100% of the energy generated in Stanfield will stay in her? In Pinal County?"
23. As we lose local ag jobs and revenue how do we get that back to the Stanfield community? The schools and local businesses need financial help for growth.
24. Given that farmland in this area typically generates approximately \$1,250 per acre in gross annual sales, how will SRP account for the loss of ongoing economic revenue to Stanfield's local businesses and agricultural economy if this land is removed from production?
25. How will SRP account for the incurable defect on property values? Due to the high prices paid by SRP to landowners.
26. Where are the majority of SRP Customers located?
27. The water rights tide to the land for solar is that stored or transferred to natural gas power plant. Being that solar requires no water use.
28. Appreciate your perspective on artificial high pressure, and how it may/may not impact neighboring homes but what about agricultural crops?
29. as for ground water usage where is the source of the water for the groundwater credits
30. what study will be done for EMF and RFI.

31. What alternative sites in remote desert areas were evaluated, and why were those locations rejected in favor of productive farmland in Stanfield?
32. what will be done to minimize light pollution
33. The extensive urban growth in Maricopa and Pinal Counties has overtaken rural areas and they have been developed quicker than their infrastructure was prepared for. How do you plan to support the infrastructure of the Stanfield community as it grows?
34. Other than water right land, why cannot this project be built on state/federal desert land?
35. I understand that a screening wall for the whole 5,000 acre project would be cumbersome, but I believe a screening wall along Stanfield Road, which connects Interstate 8 to the town of Stanfield and Highway 84, would be viable and protect that corridor for the future.
36. The panels in large groups will create an Artificial High Pressure thus increasing the temperature artificially.
37. Beyond general statements about grid reliability and regional growth, what specific, measurable benefits has SRP planned to deliver directly to the Stanfield community to offset the impacts of this project?
38. "The land owners that sold this property was a corporation, not private farms. Why can't the gas generation towers be located across the I-8? The transmission lines obscure the Tabletop mountain direct line of site for the Santa Rosa Ranchos properties."
39. The Artificial High Pressure is relating to the Heat that is coming off the Panels. In the Coolidge area it has been noted that there is an increase in Air Temperature does effect the Production of Neighboring Plants like Corn & Hay. Information is available showing a decrease in crop production
40. Would SRP pursue a project of this scale adjacent to homes and neighborhoods in Maricopa County, and if not, why is it considered appropriate for Stanfield?
41. with this being placed in our back yard, will we be able to vote for SRP board members like people on SRP power in the valley
42. How many day to day jobs, not construction, does this project bring
43. APS has a steam plant in Tempe and blows off steam from time to time and it's very loud. will you have the same, if so that's not a good thing around an equine community.
44. I think this question was missed- How will SRP account for the incurable defect on property values? Due to the high prices paid by SRP to landowners.
45. What requirements does SRP impose on its solar and battery manufacturers to prove that materials are ethically sourced, and are independent, regular audits

conducted to ensure that human rights are not being abused anywhere in the supply chain?

- 46. Can you please look into additional research regarding previously completed energy centers (not just power plants) in Maricopa and Pinal County for nearby residential property values.
- 47. In Pinal County there is no planned subdivisions in areas where Utility Grade Solar is located for over 5 years. Why is that
- 48. How will the weed control be managed?
- 49. When is the next scheduled meeting?

Marigold Energy Center

Open House

Welcome

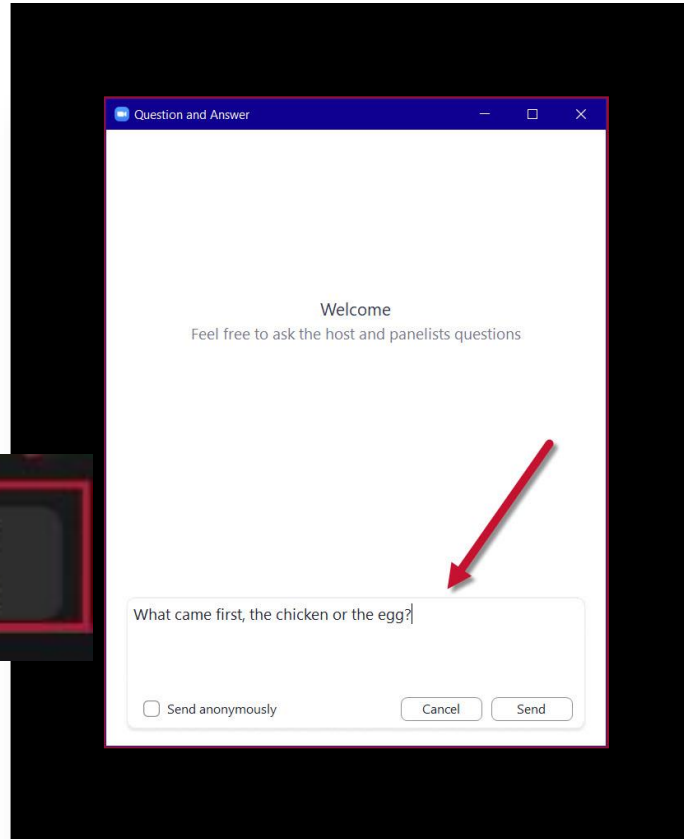
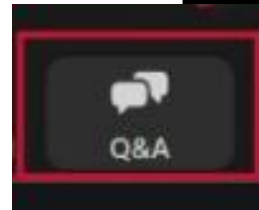
Agenda

- Introductions
- Project Overview Presentation
- Questions & Answers via Q&A Function

We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*



Feedback Survey Form



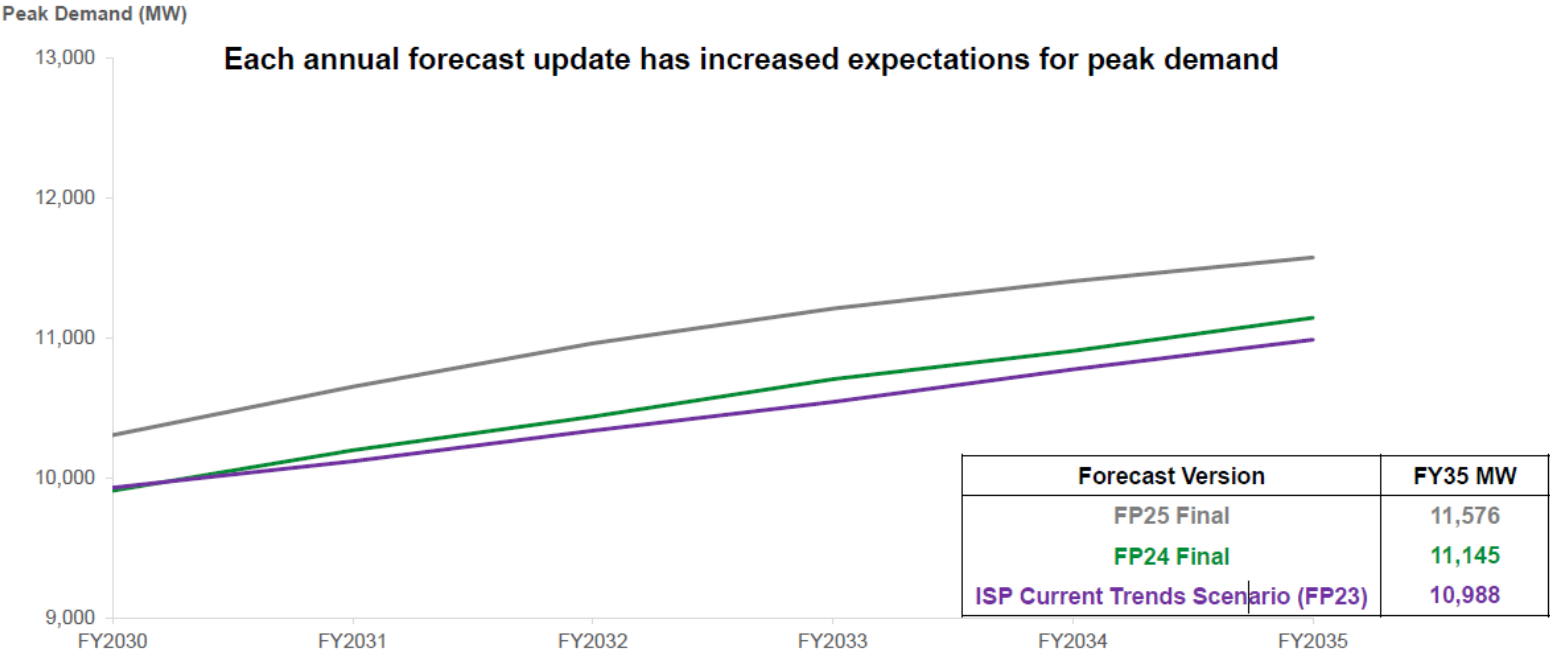
www.srp.net/marigold
1-602-236-2872

Purpose and Need

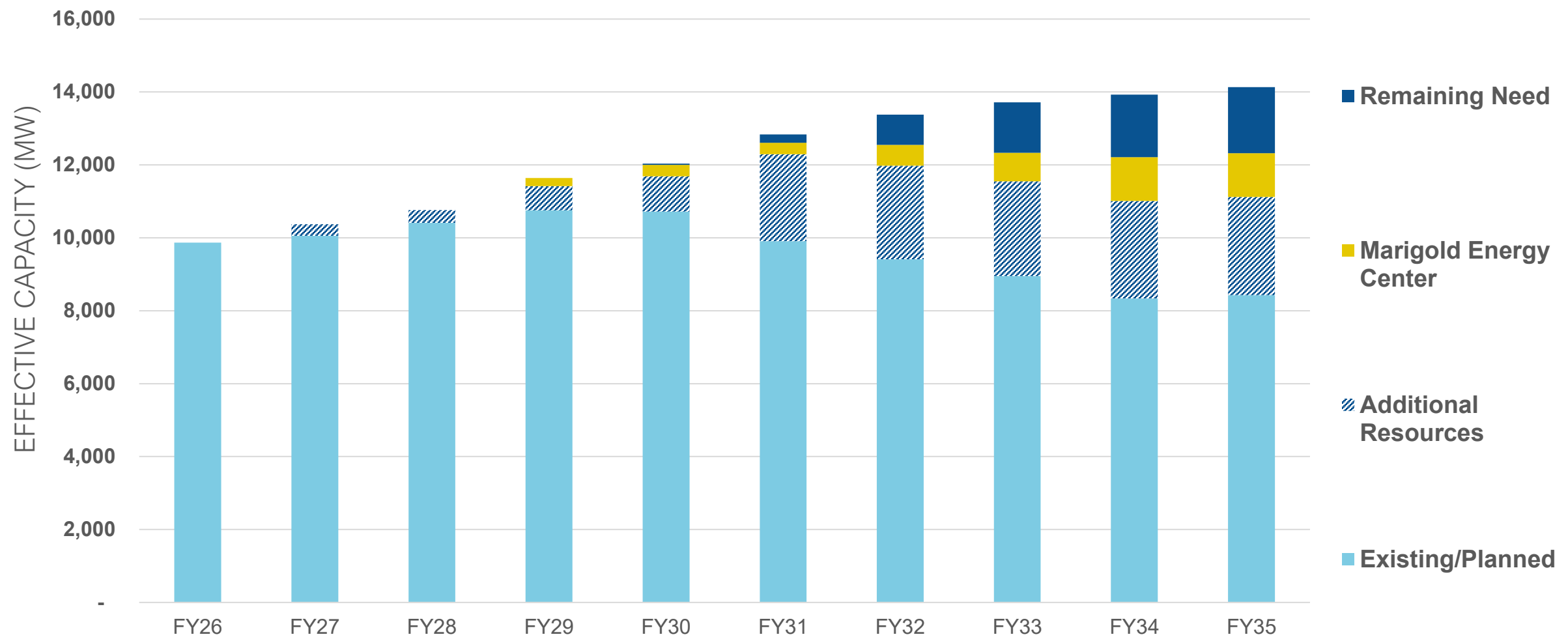
Pinal County Energy Growth



Forecasted Customer Demand Grows



Marigold Energy Center Helps Meet Summer Capacity Needs



Balanced Approach

Generation

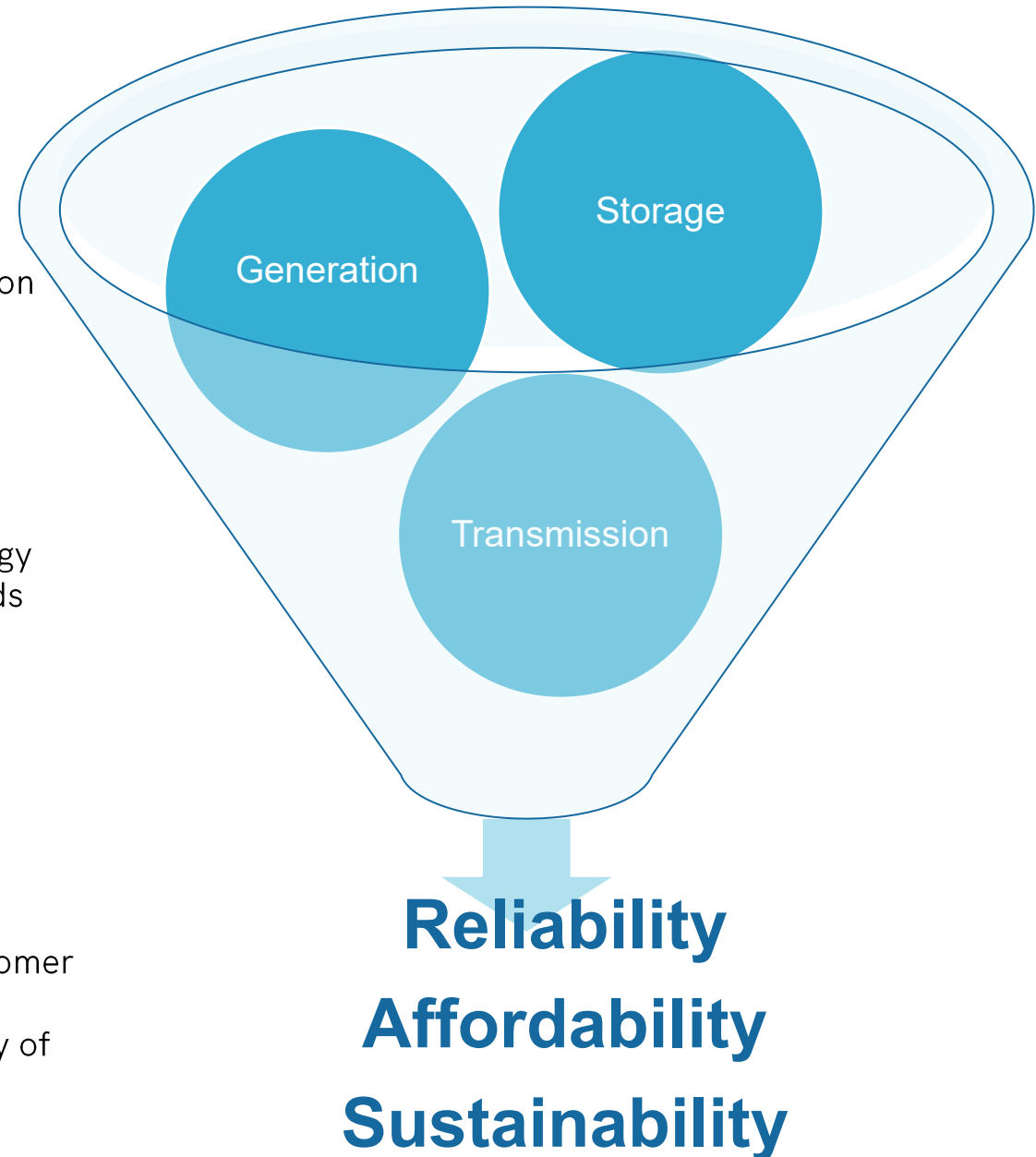
- A combination of Solar PV and Natural Gas Generation
- Values both reliability and sustainability
- Manages costs to customers

Storage

- Helps offset the intermittent nature of Solar PV Energy
- Adds to our ability to rapidly respond to system needs
- New, state of the art technology safely stores energy

Transmission

- Necessary to put power onto the grid to deliver to customers
- Connects us to other sources of energy to meet customer needs
- Links our network to improve reliability and flexibility of the grid



Proposed Project

What Sources of Power Are We Planning?

Solar

- Sustainable Energy Source
- Cost Effective

Up to 600 MW

Natural Gas

- More Megawatts in a Smaller Footprint
- Flexible and Responsive to Changes in Energy Demand

Up to 675 MW

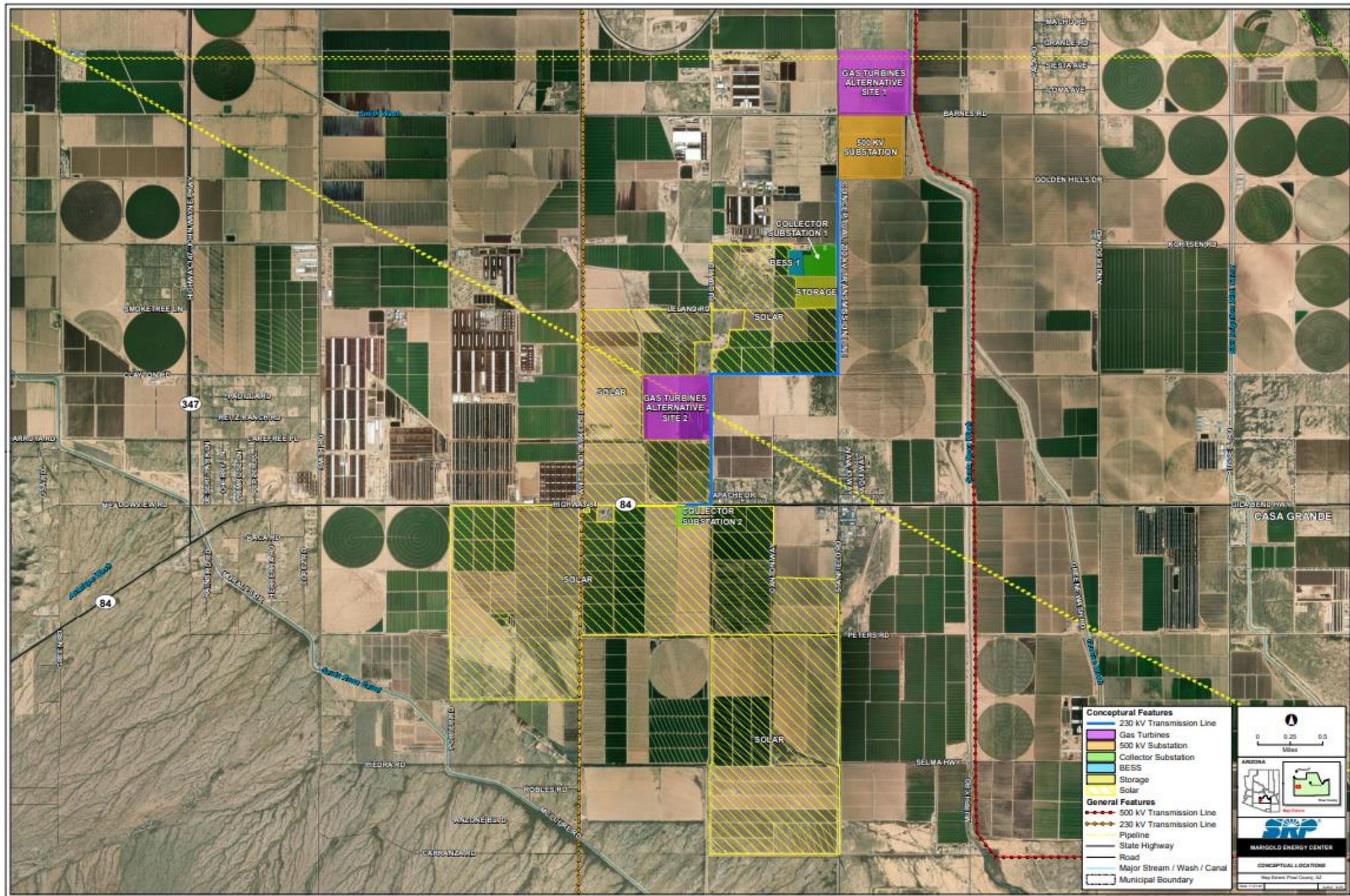
Battery Energy Storage

- Storing Solar Energy Balances Intermittent Source
- New Technology Is Safe and Effective

Up to 400 MW



ED3 is evaluating a potential partnership with SRP to procure a portion of the energy generated by the Marigold Energy Center, enhancing our ability to serve local customers with reliable and competitively priced electricity.



Substation Example



What is a Substation?

- Powerlines connect into and out of substations
- Contain transformers which can raise or lower the voltage to deliver power
- A central hub where lines can connect and where generators can put their electricity onto the grid.

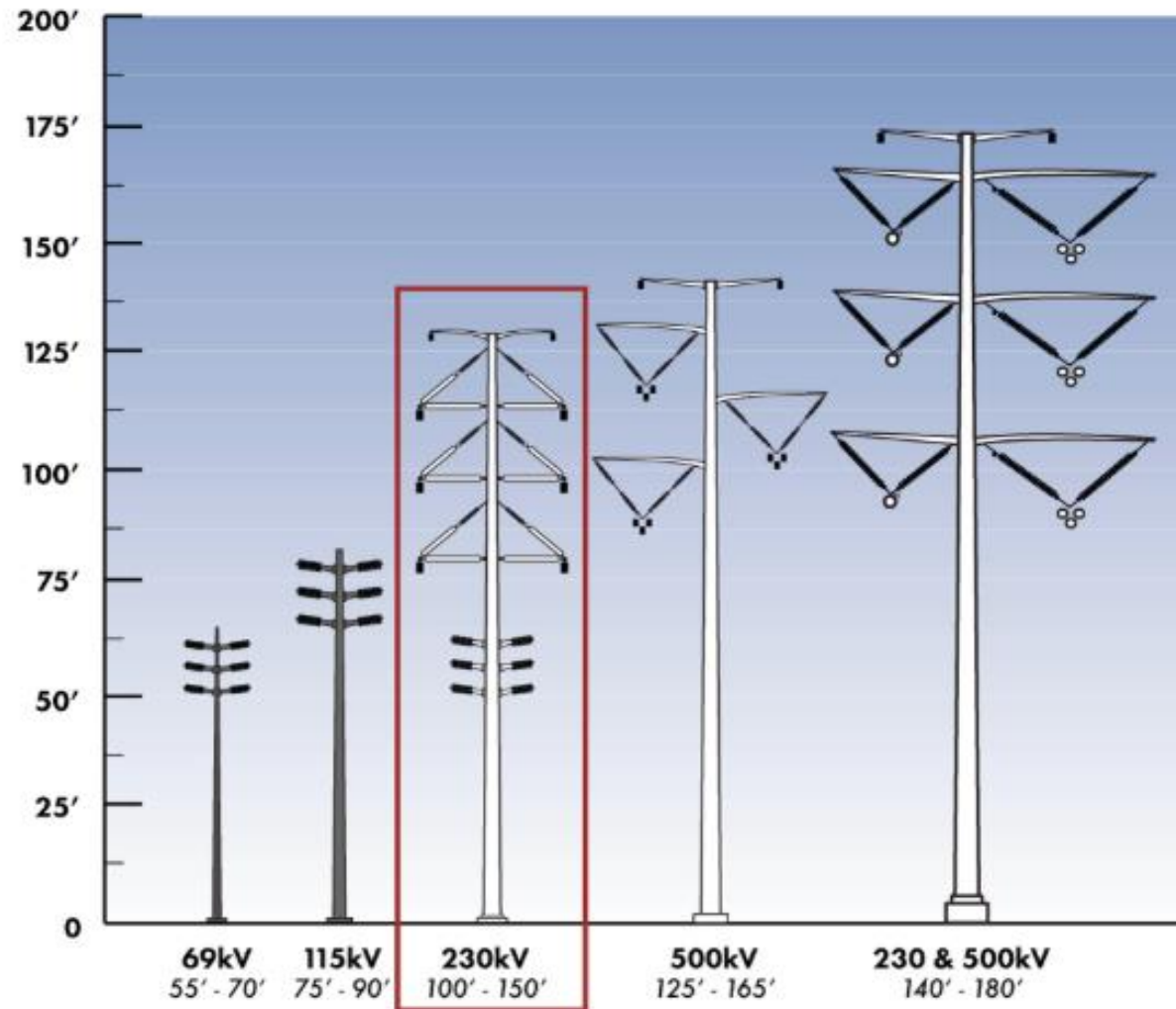
Transmission Line Example



High Voltage Transmission Lines

- 230 kV lines interconnect all generation components to the transmission grid
- Typical heights 120-160 feet
- Typical Right-of-way 175-200 feet
- Structure design not determined yet

Typical Structure Types



Represents SRP's typical structures. Actual structure types for this project have not yet been determined and may vary depending on location.

Solar PV Example



Solar PV Panel Technology

- Panels can pivot to track with the sun to maximize their exposure
- Turn the sun's energy into electricity
- Panels are connected via underground or above ground cables to a collector station that aggregates power to be delivered via a transmission line

Natural Gas Generator Example



There are different types of natural gas generators, for this project the exact design is not yet selected

Natural Gas Generation

- Also called thermal generation, burns fuel (natural gas) to generate electricity
- Uses water when needed to cool the equipment, condition air, and reduce some emissions , amount is dependent on design and air temperature

Battery Energy Storage System (BESS) Example



BESS Technology

- State of the art BESS are in individual containers to enclose and contain each system
- Designed with monitoring systems to automatically report operating conditions
- Key safety measures reduce risk of fire by managing and containing any potential issues

Siting, Environmental and Regulatory Process

Statutory Requirements: Environmental

Air Quality

Biological Resources

Cultural and Historical Resources

Geology and Soils

Hydrology

Land Use

Noise

Recreation

Visual and Aesthetics



Arizona Corporation Commission (ACC) Siting Process



File application
for a Certificate of
Environmental
Compatibility (CEC)

**Anticipated Mid
August 2026**



**Line Siting Committee
Public Hearing**
(30-60 days after filing CEC
application)

**Starts on September
21, 2026**

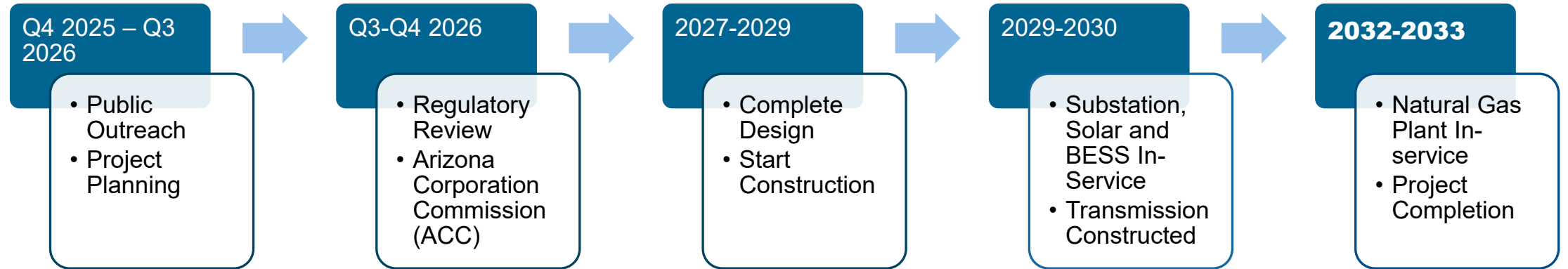


**ACC
Open Meeting**
(30-60 days after Siting
Committee Decision)

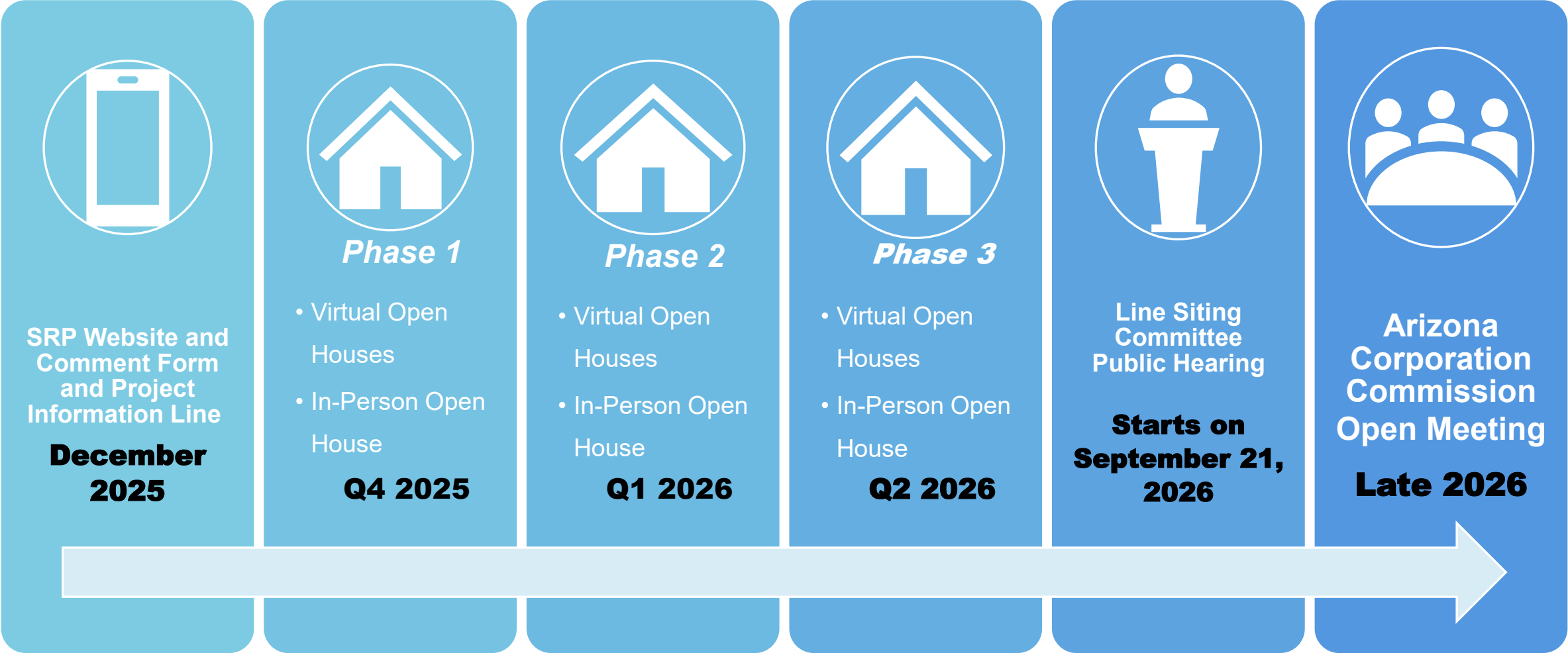
Q4 2026



Preliminary Schedule



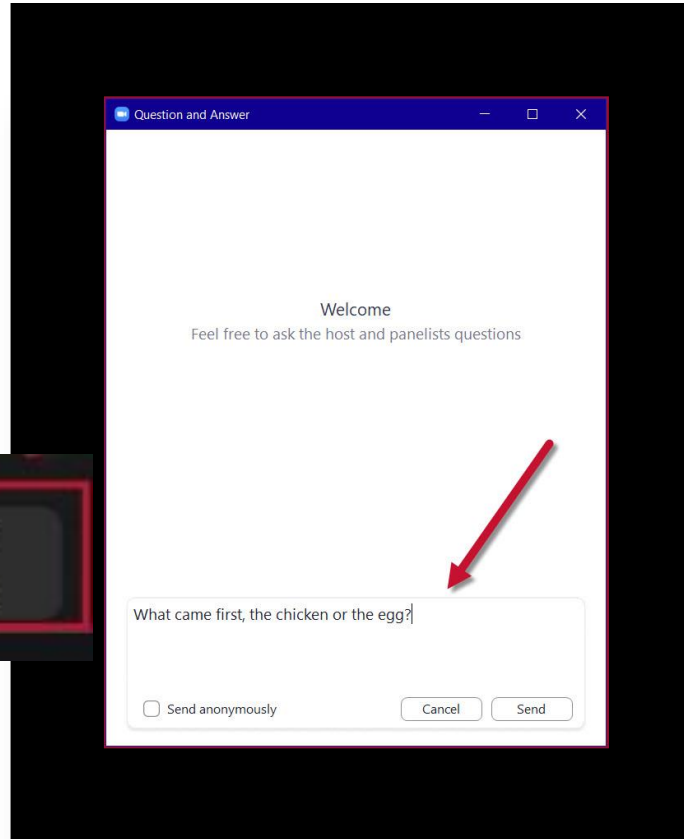
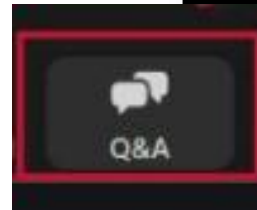
Opportunities for Public Input



We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*



Feedback Survey Form



www.srp.net/marigold
1-602-236-2872

thank you!

EXHIBIT J-3B
PHASE 2

MARIGOLD OPEN HOUSE #2 SUMMARY

Summary

SRP hosted the second in a series of Open Houses for the Marigold Energy Project at Stanfield Elementary School on March 25, 2026, from 5:00 to 7:00 p.m. Partnered with ED3 and Fire and Risk Alliance, SRP engaged the community and received feedback. There were 29 participants throughout the evening.

Project stations included:

- Project Overview
- Engineering & Construction
- Siting, Engagement, Environmental & Regulatory Process
- Interactive GIS Station (To map stakeholder location in comparison to project location)
- SRP Water Resources
- Electrical District No. 3 (ED3 representatives present at station)
- Community Support*
- Noise Study
- Fire and Risk Alliance (James Caulfield)
- Comment Area*
- Kids Zone

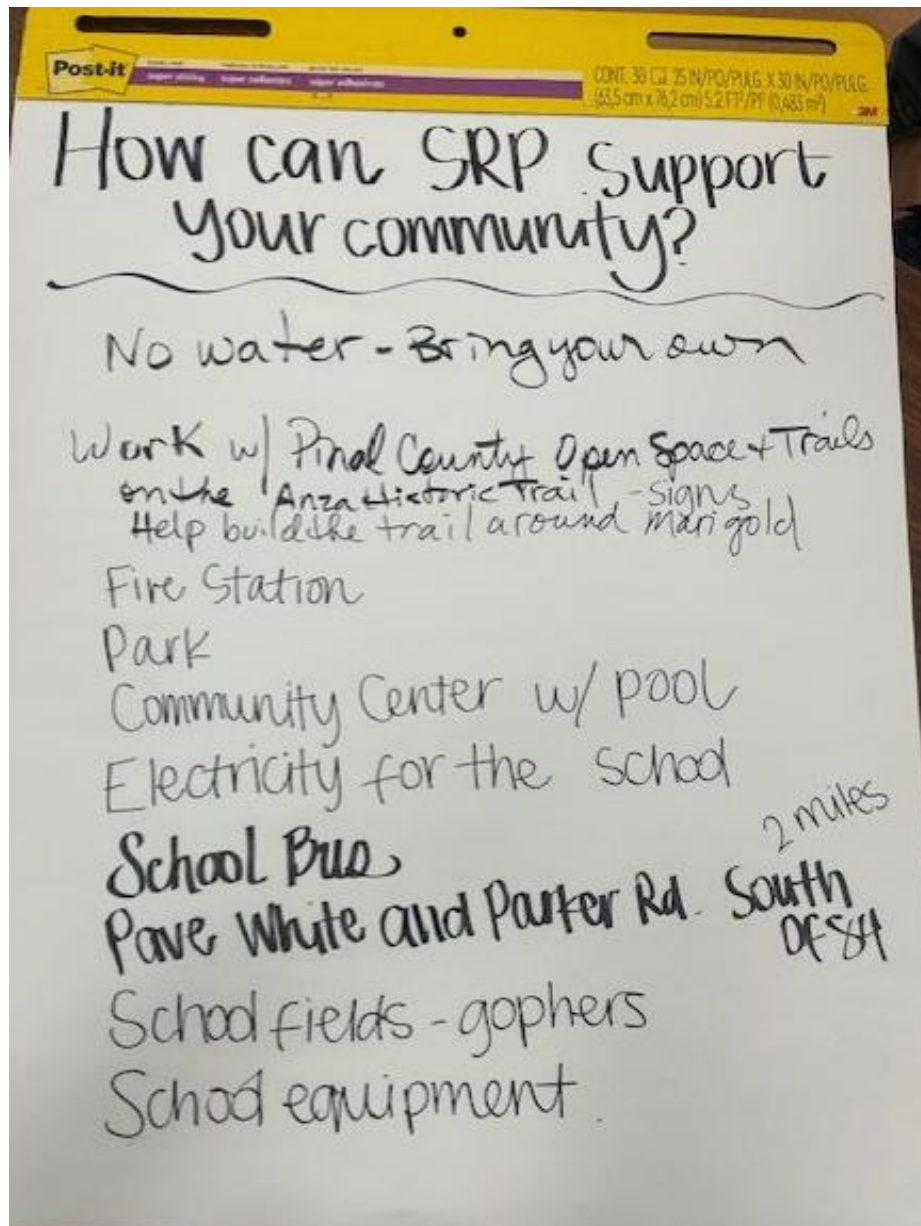
Community members raised concerns including property value, fire safety, livestock safety, noise, air quality, visual screening, trail expansion efforts/community benefits and water resources. However, they valued the opportunity to share their perspectives on the project.



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Suggestions Captured*



Delivering water and power®

Comment Forms (2)*



Delivering water and power®

Name: Maryeileen Flanagan

Email: RainfireStables@yahoo.com

Phone Number: 602 820 7293

- Comments: ① Hard to understand many maps as E-W streets are mislabeled. (Drive the area and see REAL names; Google lies!)
- ② Add tall trees or screening around solar farms. Let's hide the panels and "keep" the desert green.
- ③ Look at the Anza trail project. Don't block the trail - instead, help build the trail.



Delivering water and power®

Name: Robin Davis

Email: robindavis11369@outlook.com

Phone Number: 619-884-8887

- Comments: I don't really like the idea of solar.
I know it's quick & easy to get power going.
But it takes too many acres to get too little power.
- Help build the Anza Historic Trail
around the Marigold project!
Contact Scott Hamilton@Pinal County Open Space
& Trails



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Sign In (29 non SRP)

Sign-In Sheet		
Name	Email Address	Relationship to Community
Jodie Newell		Reporter Casa Grande Dispatch
Sara Carroll	sas3az@gmail.com	Resident
Jessica Biggs Archibald	lraeb72@gmail.com	Res.
Jackie Thielke	jdarcator@gmail.com	Resident
Norm Wapal		Resident
Maryjean Flanagan	RainfireStables@yahoo.com	Resident
Jerry Zink		Resident
Eric Gochl	Eric.Gochl@maricopa.gov	Marijuana City Council
Robin Davis	robindavis1136@gmail.com	Resident
Rich Vitello		Pinal County Supervisor
Jennifer & Dennis Marnett		Community member
Rick DeVore	RDEVORE@ME.COM	Business in Area
KARE COFFEY	KARECOFFEY@gmail.com	Resident
Lori Sharp	lovinmarky182@gmail.com	Resident
Doug Cole	dcole@azhighschools.net	NextEra
Jadee Rohrer	jadeerohrer@gmail.com	Resident
Ed WEDMAN	wedmans@xplornet.ca	Shaw BIRD
David Frederick		Business in area
TOM SCOTT	tomscott@msagroupvent.com	Business
Dan Mikalacki		Business



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Sign-In Sheet

[illegible]

Delivering water and power®

MARIGOLD VIRTUAL OPEN HOUSE #2 SUMMARY

Summary

SRP hosted the second in a series of virtual open houses for the Marigold Energy Project on March 31, 2026, from 6:00 to 7:00 p.m. William Loper (SRP), Sarah Justus (KPE), and Athony Natale (Fire Risk Alliance) provided a project overview presentation followed with an interactive Q&A session.

Attendees: 9

Attendees from SRP, KPE and Fire and Risk Alliance were excluded from this list.

Name (original name)	Email	Total duration (minutes)
Raina Flintoff	rain.g.johnson@gmail.com	60
AR Reese	stanfieldroad@yahoo.com	60
Sam English	sam.english@deweysquare.com	60
Clara	clara.zusi@gmail.com	21
Gabor Szogyenyi	szogye@gmail.com	56
Richard Sigler	rsigler1952@gmail.com	59
lenore	lenoreb70@gmail.com	60
hyun	henry.yun@epicstarenergy.com	51
Bryan Hartman	bryan_hartman@hotmail.com	42

Questions Received: 4

Listed exactly as typed.

1. Has BESS safety increased in the last few years.
2. Property value implications for future sale or development
3. what are the tax implications on properties in the surrounding area.
4. Are you concerned that the Natural Gas infrastructure will become a stranded asset with the continued falling prices of solar and BESS which is expected to continue to happen. Why not use more solar and BESS and less gas.



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Marigold Energy Center

Virtual Open House

Welcome

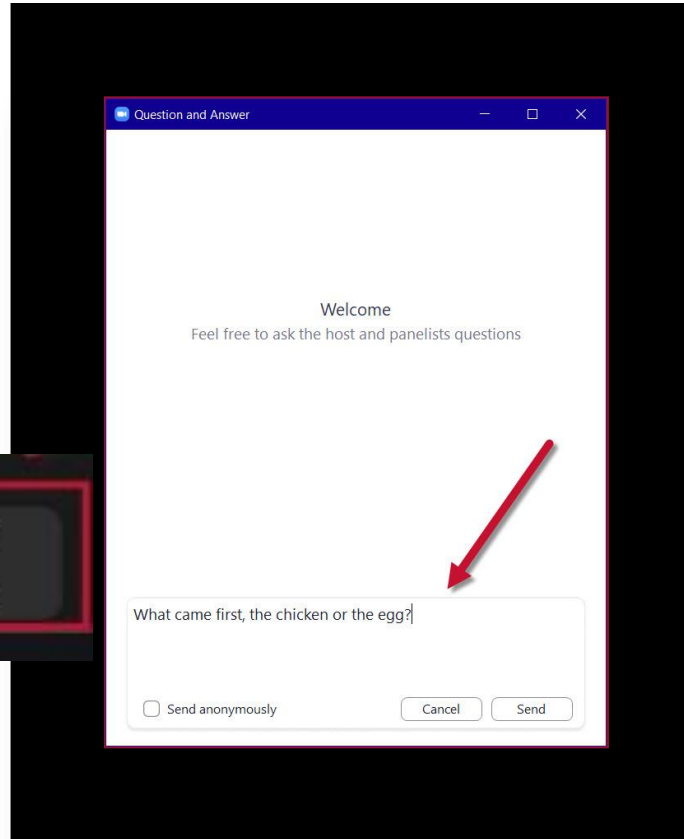
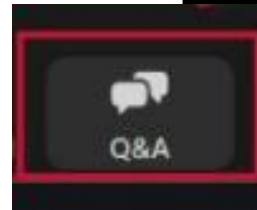
Agenda

- Introductions
- Project Overview Presentation
- Questions & Answers via Q&A Function

We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*

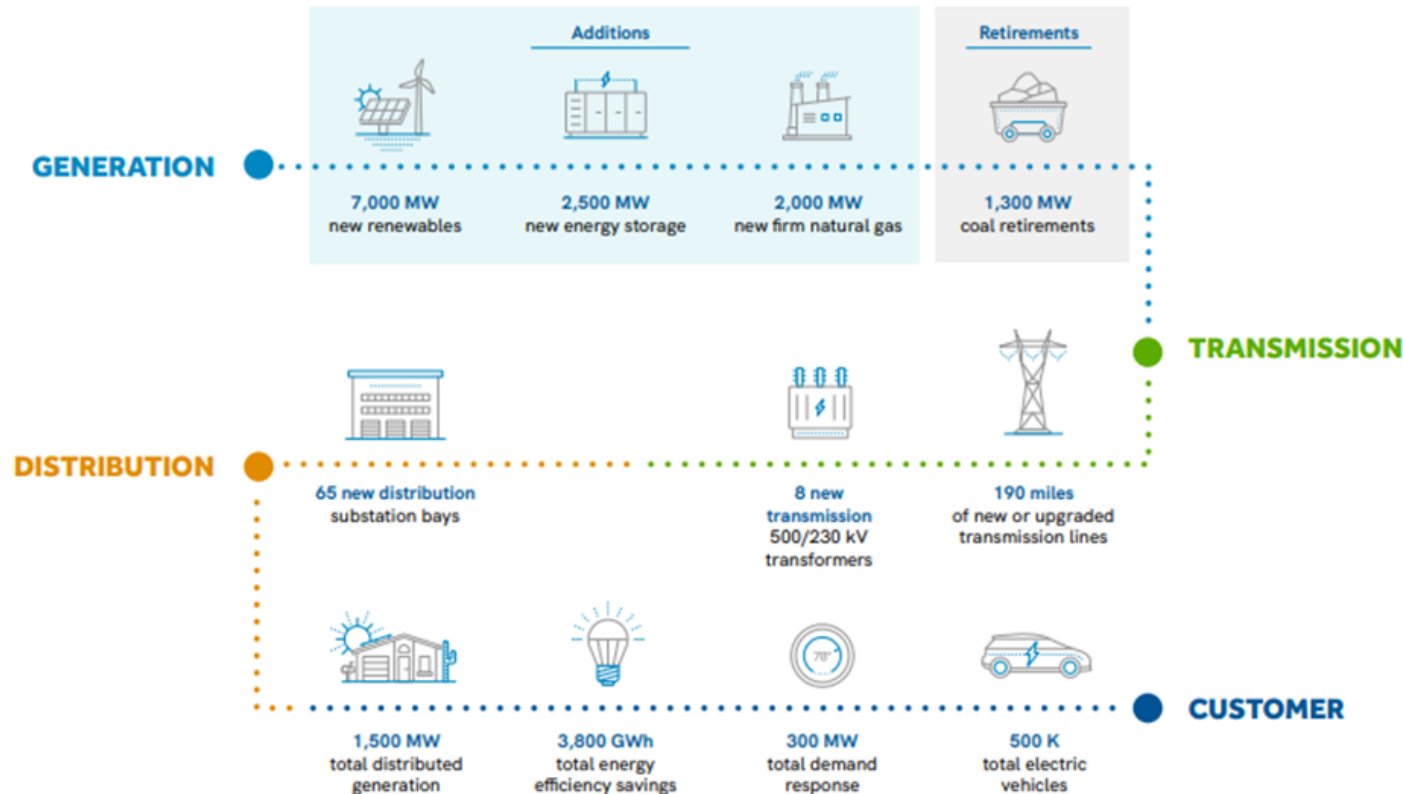


www.srp.net/marigold
1-602-236-2872

Purpose and Need

Salt River Project (SRP) – Integrated System Planning

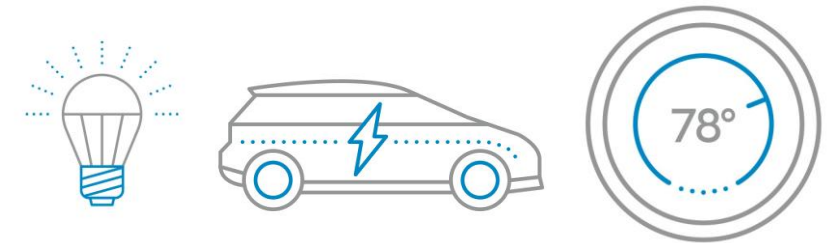
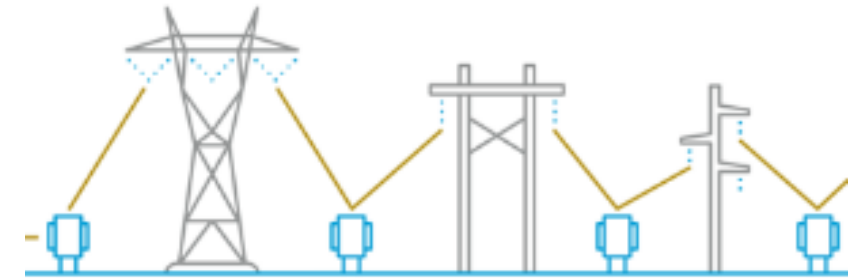
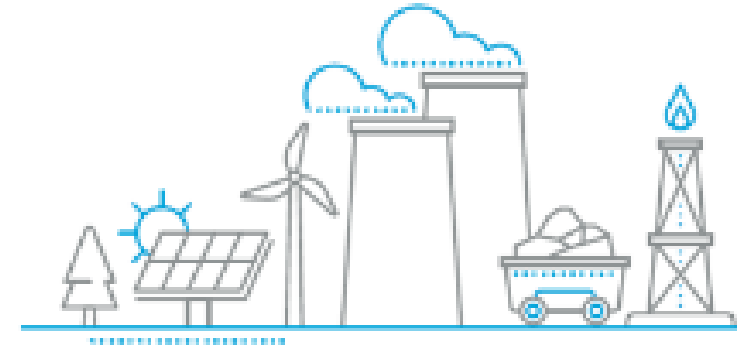
Solutions to Meet Growing Demand and Customer Needs



- ✓ Adding Generation
 - Renewable Energy
 - Storage
 - Firm Natural Gas
- ✓ Converting Coal Plants
- ✓ Upgrading Transmission Grid
- ✓ Expanding Distribution
- ✓ Growing Distributed Generation
- ✓ Energy Efficiency
- ✓ Demand Response
- ✓ Support Electrification

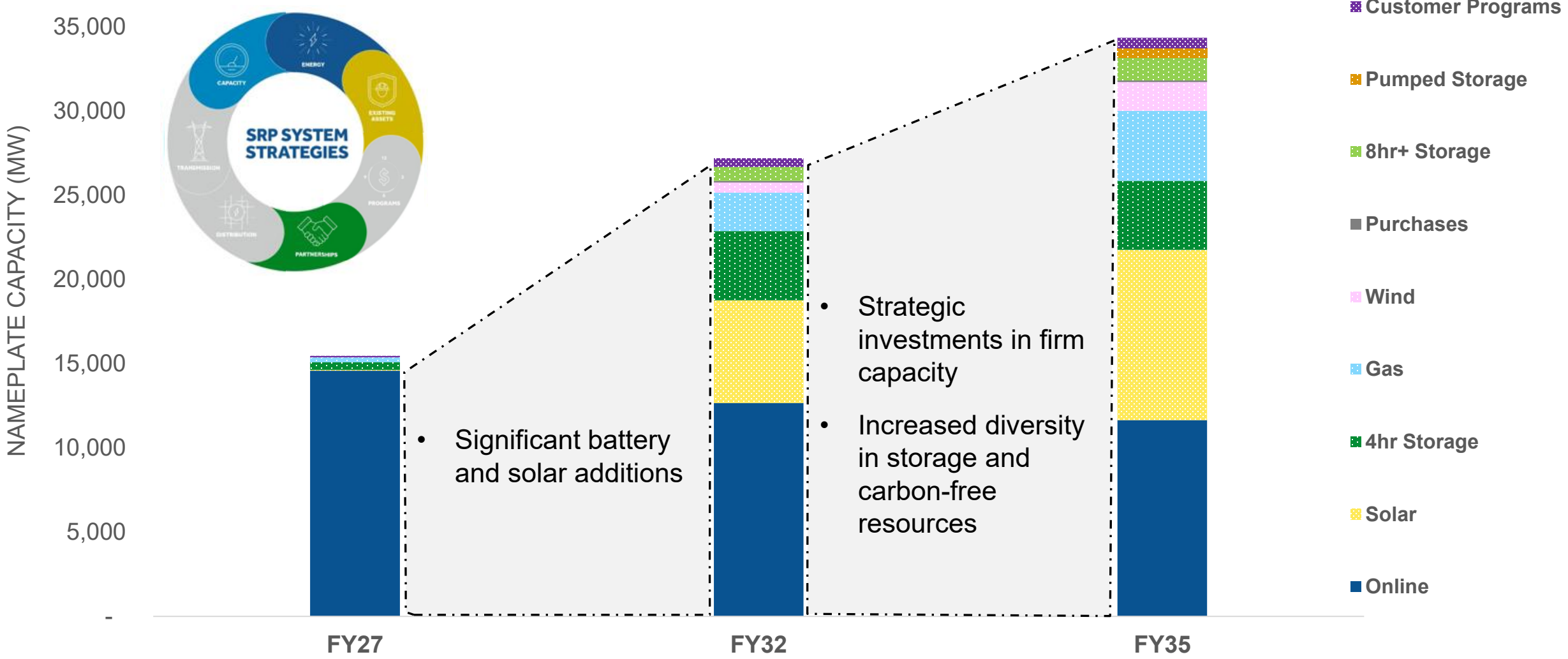
Key Takeaways from SRP's Integrated System Plan

- SRP will need to more than **double if not triple resource capacity** in the next decade
- Firm capacity **and** renewables are part of **least-cost portfolio** in all scenarios
- **Hundreds of miles** of transmission and **nearly twice** the transformers are needed
- SRP will need to **evolve programs and price plans** to shift consumer behavior

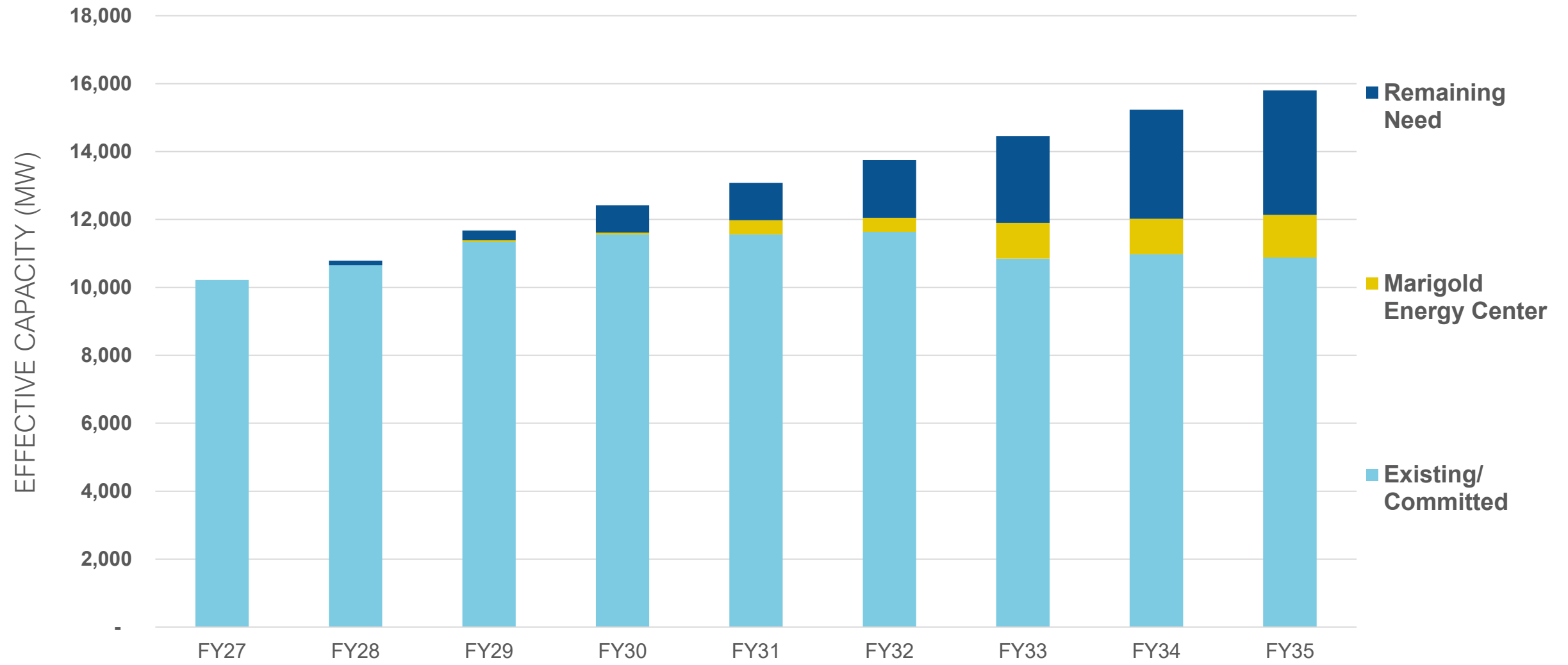


Fiscal Year 2027 Resource Plan Summary

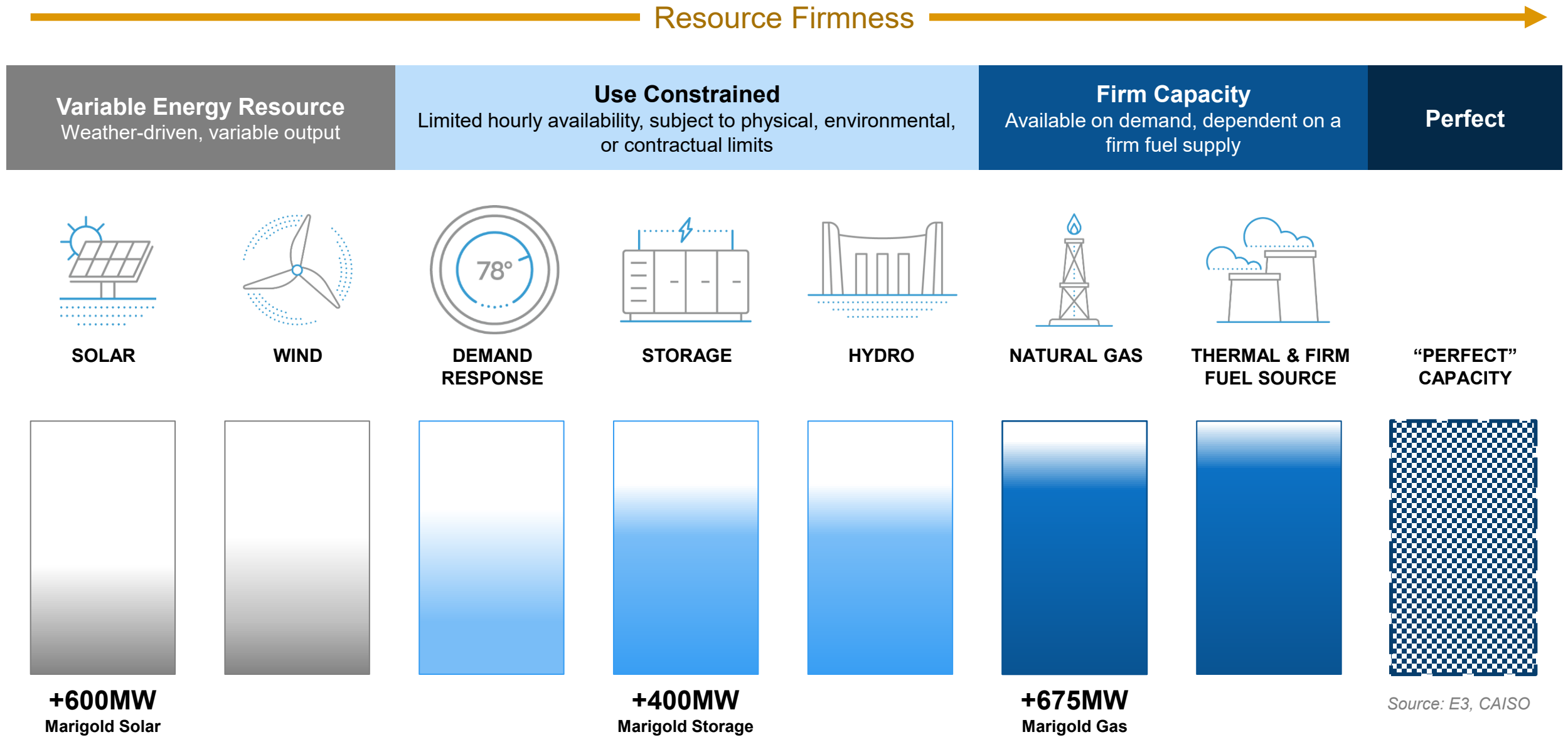
RESOURCE ADDITIONS BY GENERATION TYPE



Marigold Energy Center Helps Meet Summer Capacity Needs



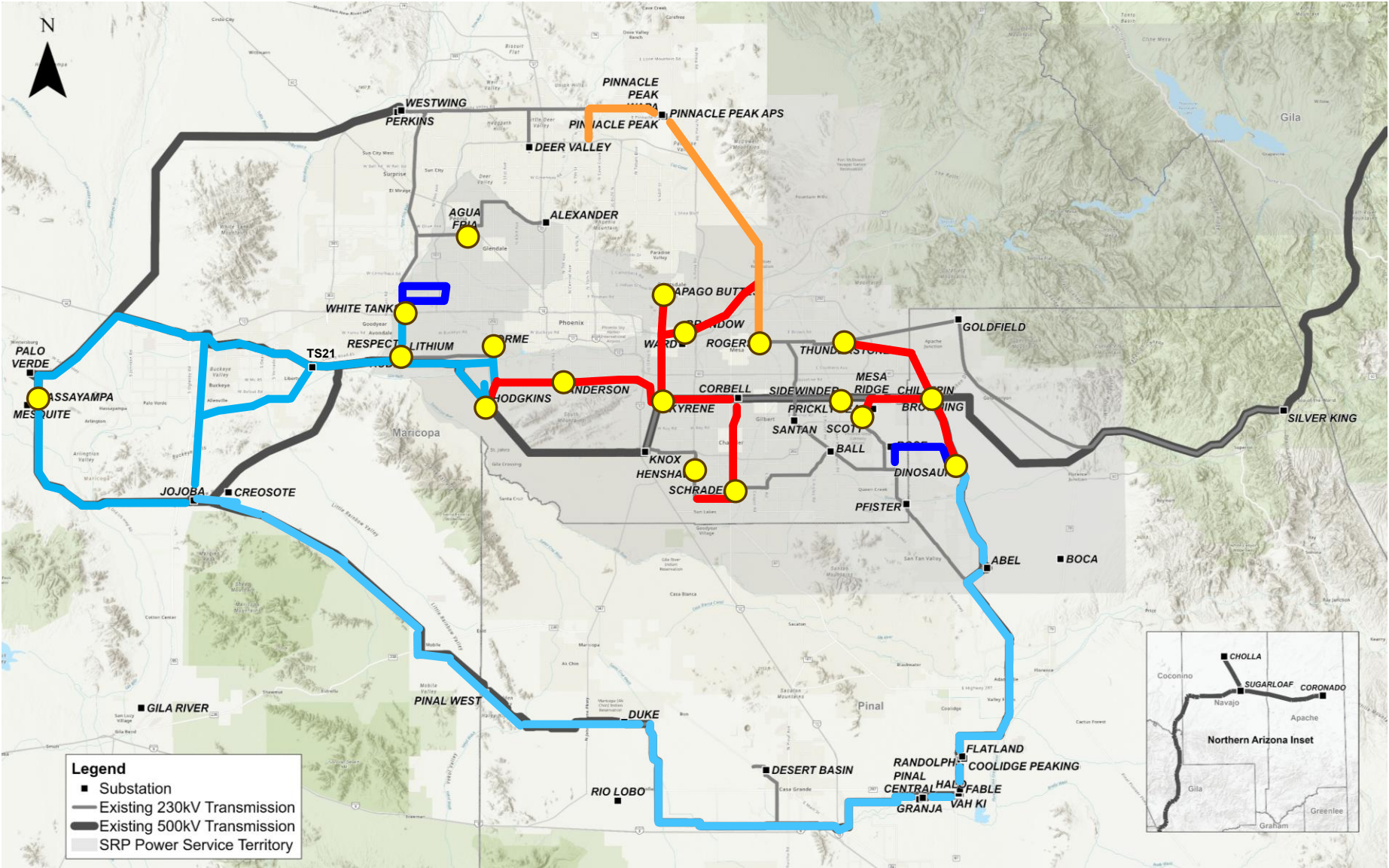
Resource Availability to Support Reliability



Source: E3, CAISO

Transmission Upgrades

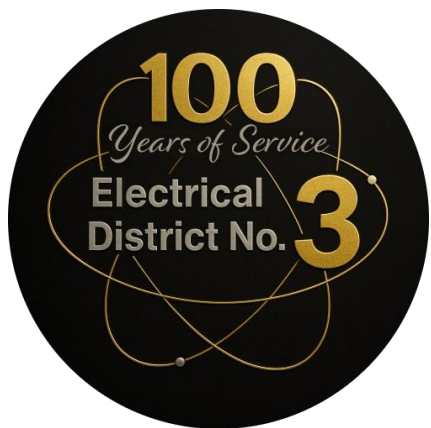
- Upgrade Line
- New Line (CEC)
- UG Load Loop & Projects Served
- Upgrade Line (Non-SRP)
- Identified System Needs





Electrical District 3

ED3 is evaluating a potential partnership with SRP to procure a portion of the energy generated by the Marigold Energy Center, enhancing ED3's ability to serve local customers with reliable and competitively priced electricity.

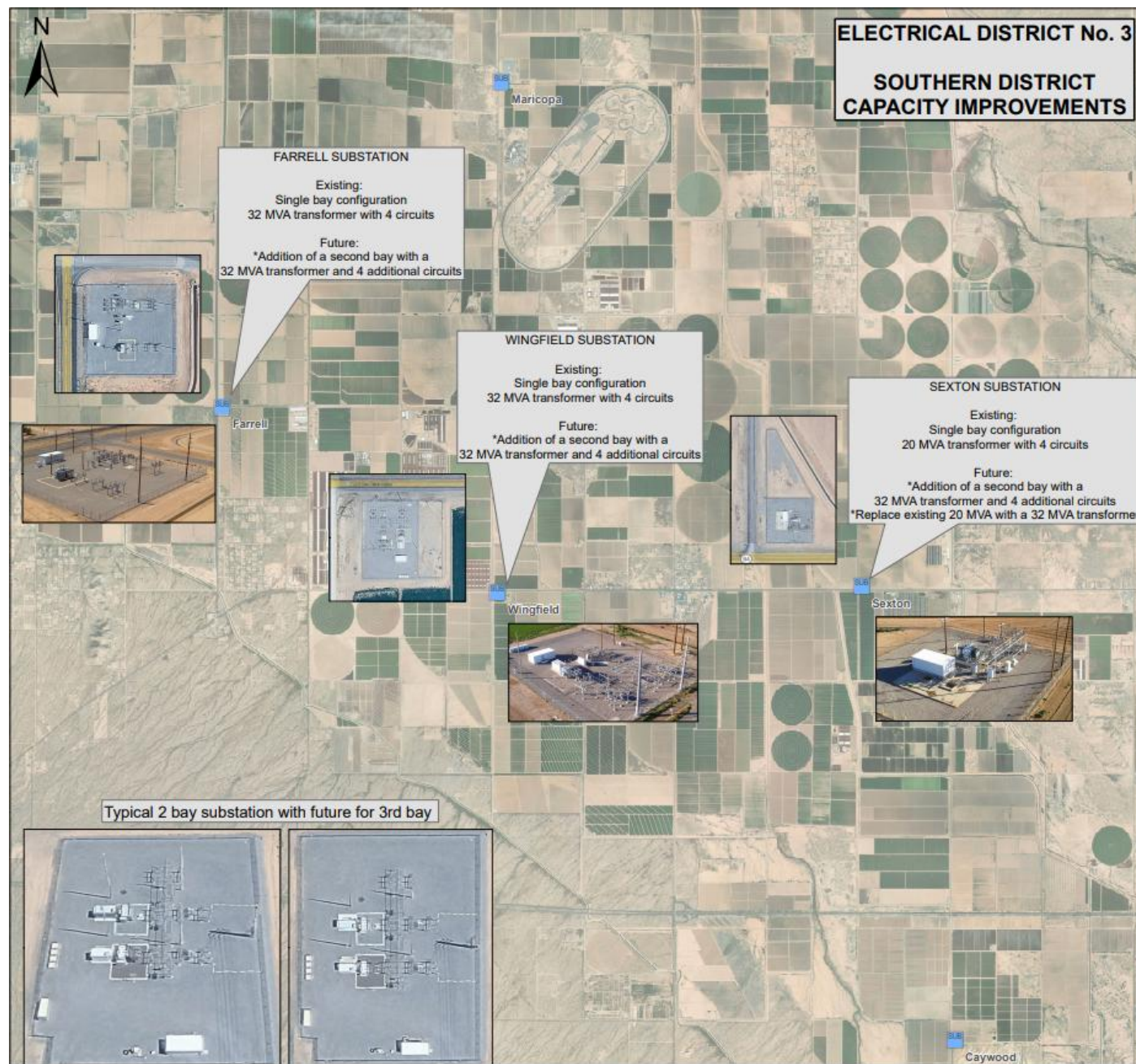


Tentative Operations
Date for Substation
Upgrades:

Wingfield Substation
– September 2027

Sexton Substation
– December 2027

Farrell Substation
– December 2028

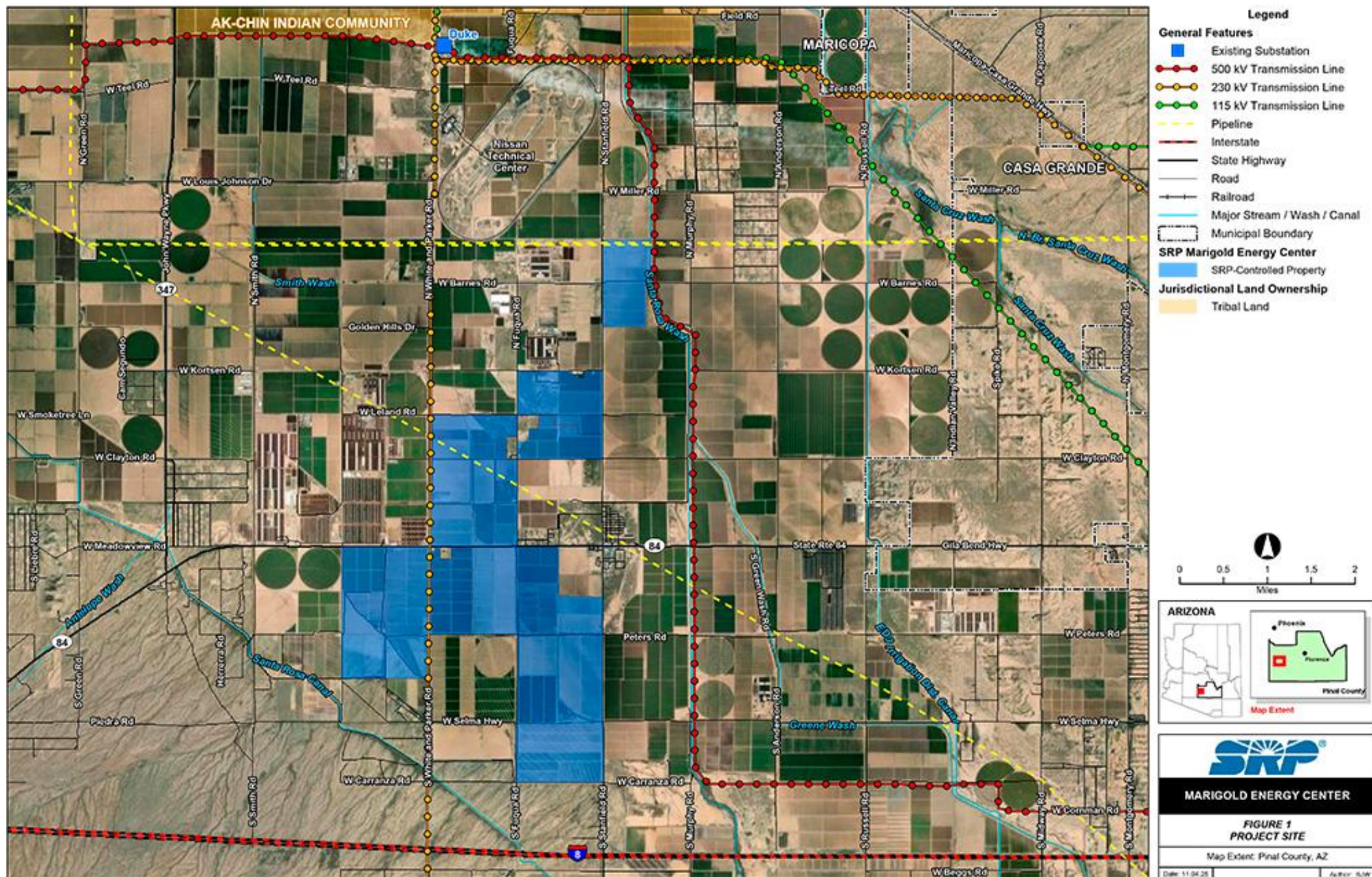


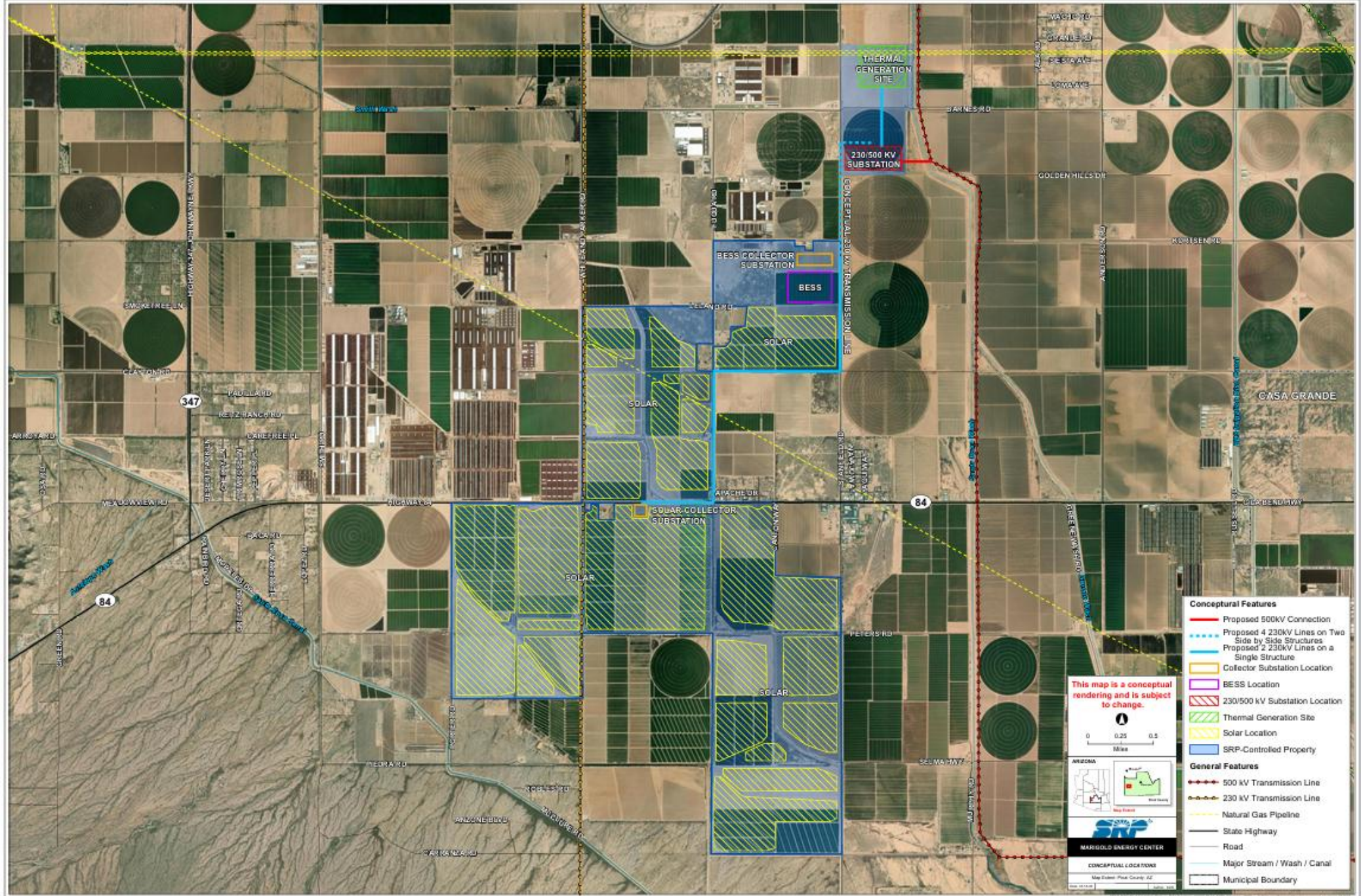
Southern Capacity Substation Improvement Projects are included in the 5-year capital improvement program plan for ED3 with investment totaling approximately \$14 million.

In January 2026, ED3 placed orders for long-lead time project elements for Wingfield Substation and Sexton Substation such as transformers and circuit breakers. Engineering design work for all three projects have been approved.

The projects improve both capacity and reliability for the southern area of ED3.

Proposed Project





Project Rendering – Birdseye View



Project Simulation – Key Observation Point (KOP) 1



*Corner of Pala Road and Barnes Road
looking West*

Current Condition

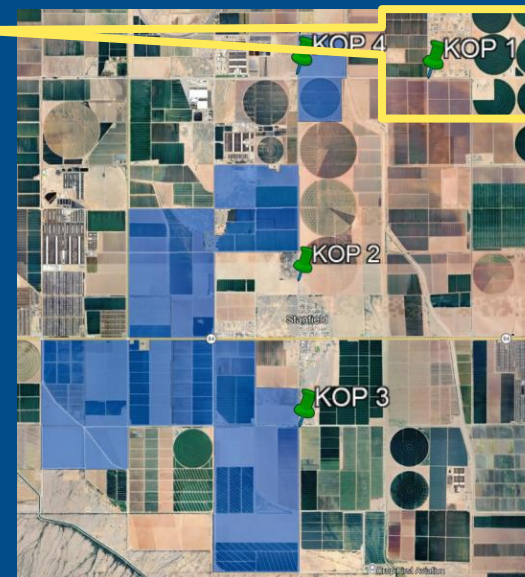


Project Simulation – Key Observation Point (KOP) 1



*Corner of Pala Road and Barnes Road
looking West*

Simulated Condition

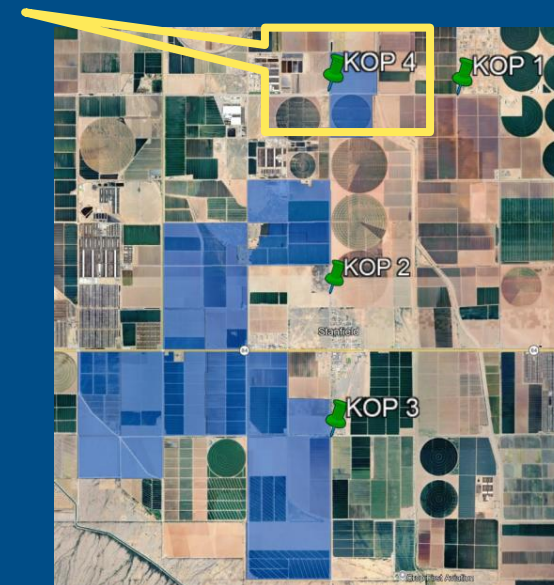


Project Simulation – Key Observation Point (KOP) 4



Corner of North Stanfield Road and Barnes Road looking Northeast

Current Condition

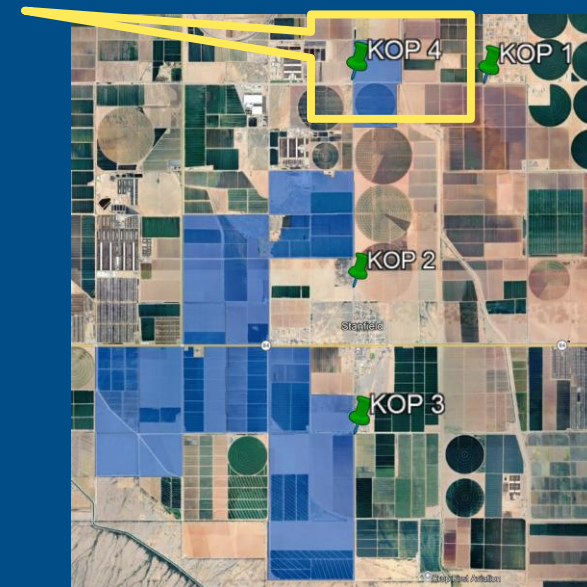


Project Simulation – Key Observation Point (KOP) 4



Corner of North Stanfield Road and Barnes Road looking Northeast

Simulated Condition

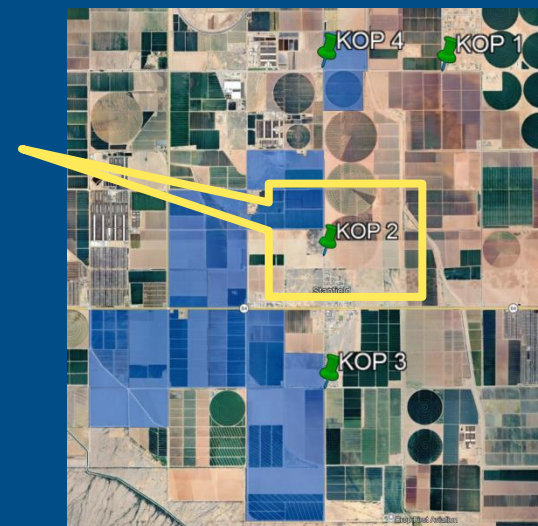


Project Simulation – Key Observation Point (KOP) 2



North Stanfield Road looking Northwest

Current Condition

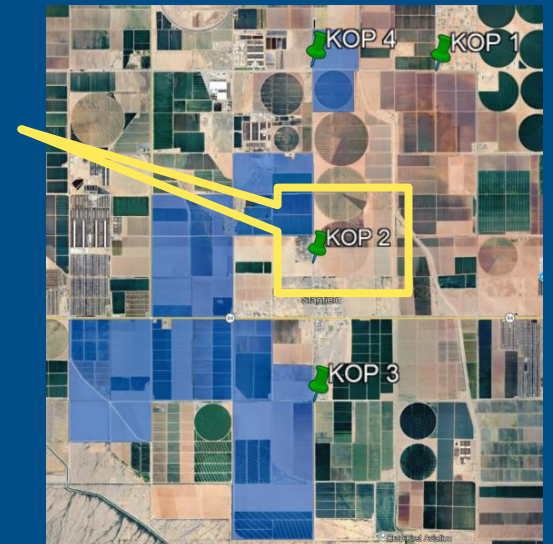


Project Simulation – Key Observation Point (KOP) 2



North Stanfield Road looking Northwest

Simulated Condition

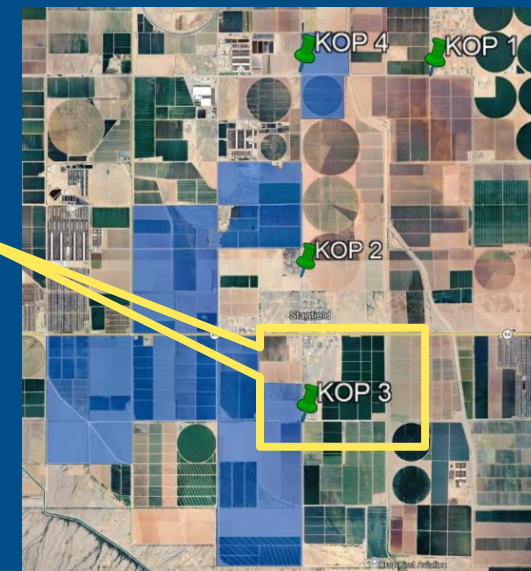


Project Simulation – Key Observation Point (KOP) 3



*North Fuqua Road & State Route 84 –
Looking Southwest*

Current Condition

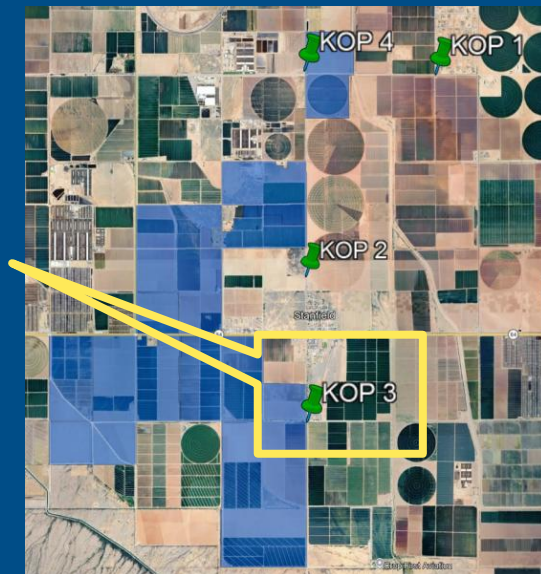


Project Simulation – Key Observation Point (KOP) 3

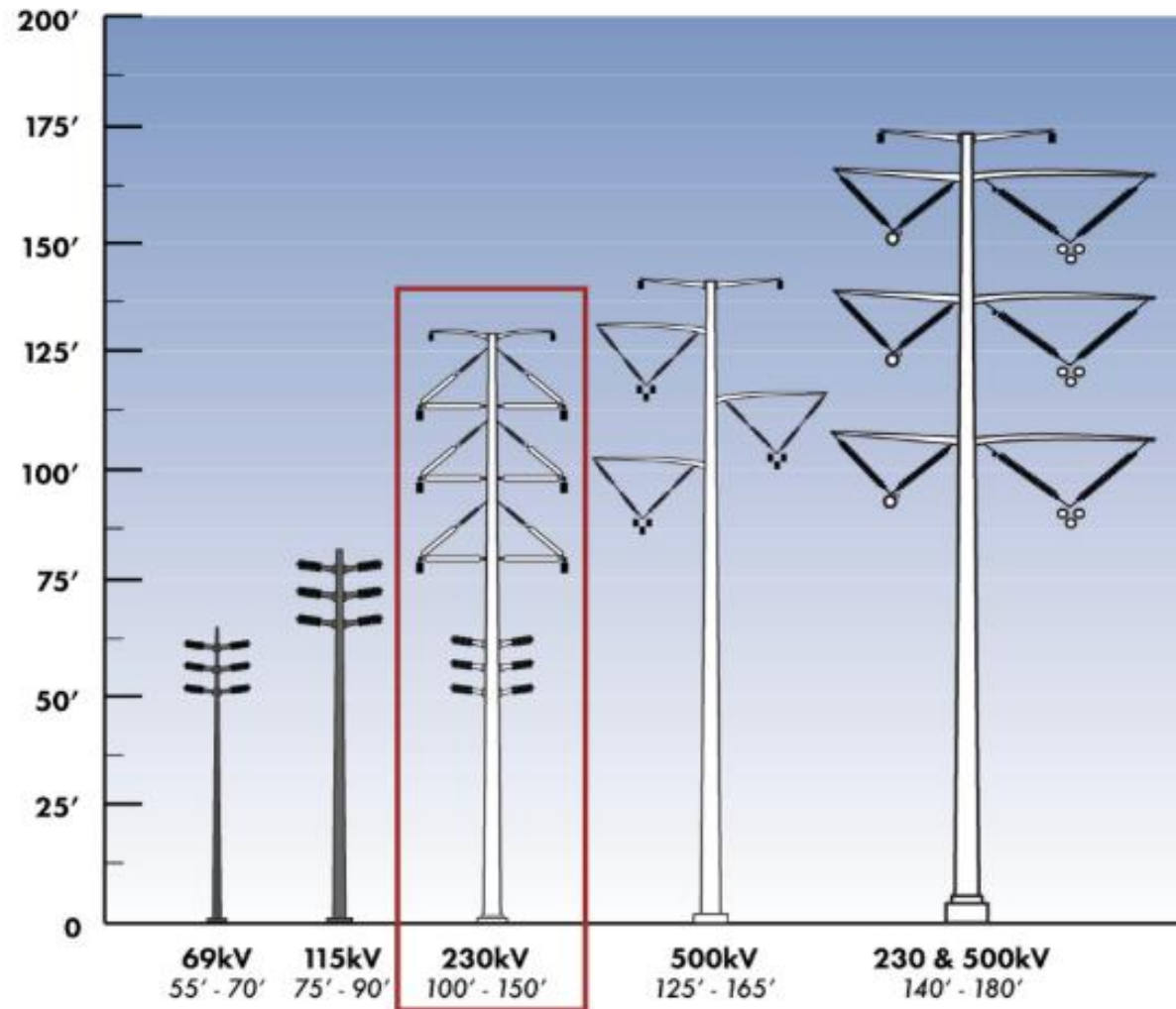


*North Fuqua Road & State Route 84 –
Looking Southwest*

Simulated Condition



Typical Structure Types



Represents SRP's typical structures. Actual structure types for this project have not yet been determined and may vary depending on location.

Marigold Energy Center- Water Resources

SRP is in the early phases of discussing potential water acquisitions and partnerships for the **Marigold Energy Center**.

Marigold is in the **Pinal Active Management Area (AMA)**, regulated by ADWR.

SRP's 2035 Sustainability Goal is to eliminate or offset groundwater use for power generation within an AMA. Marigold plans to incorporate **renewable water sources** as part of this commitment.

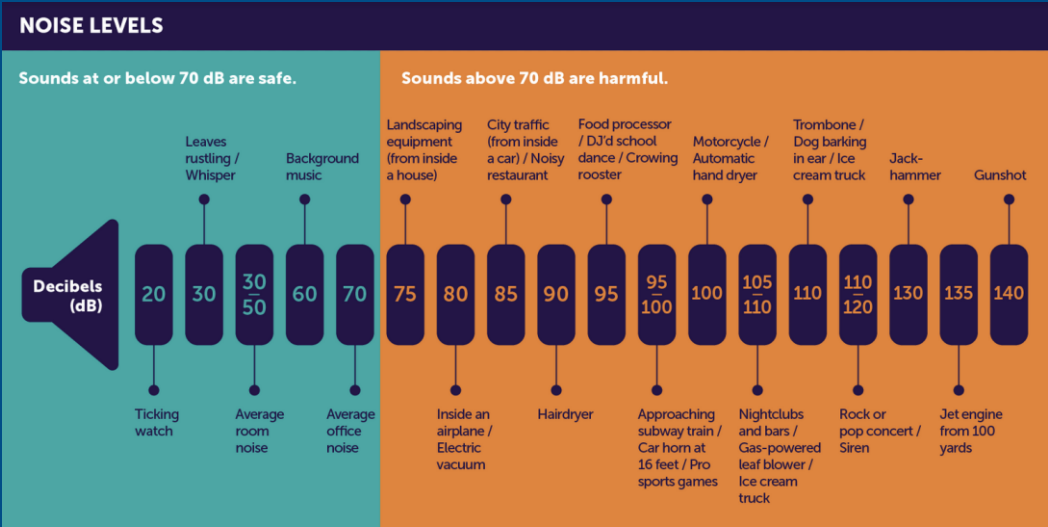
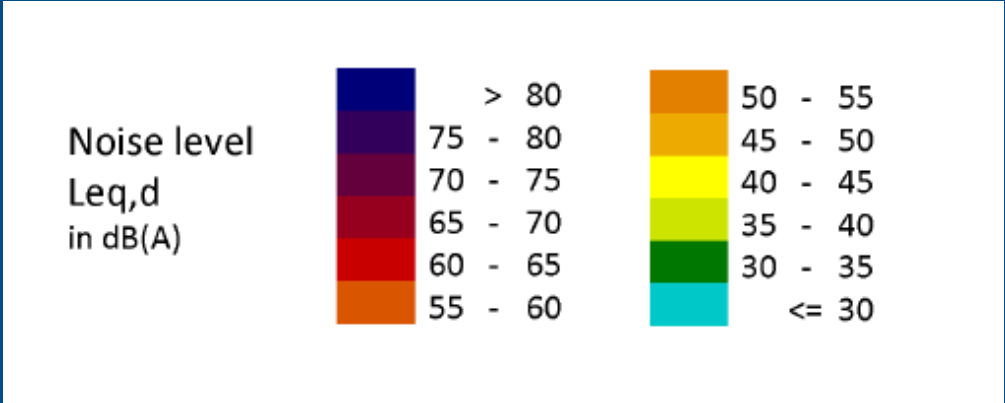
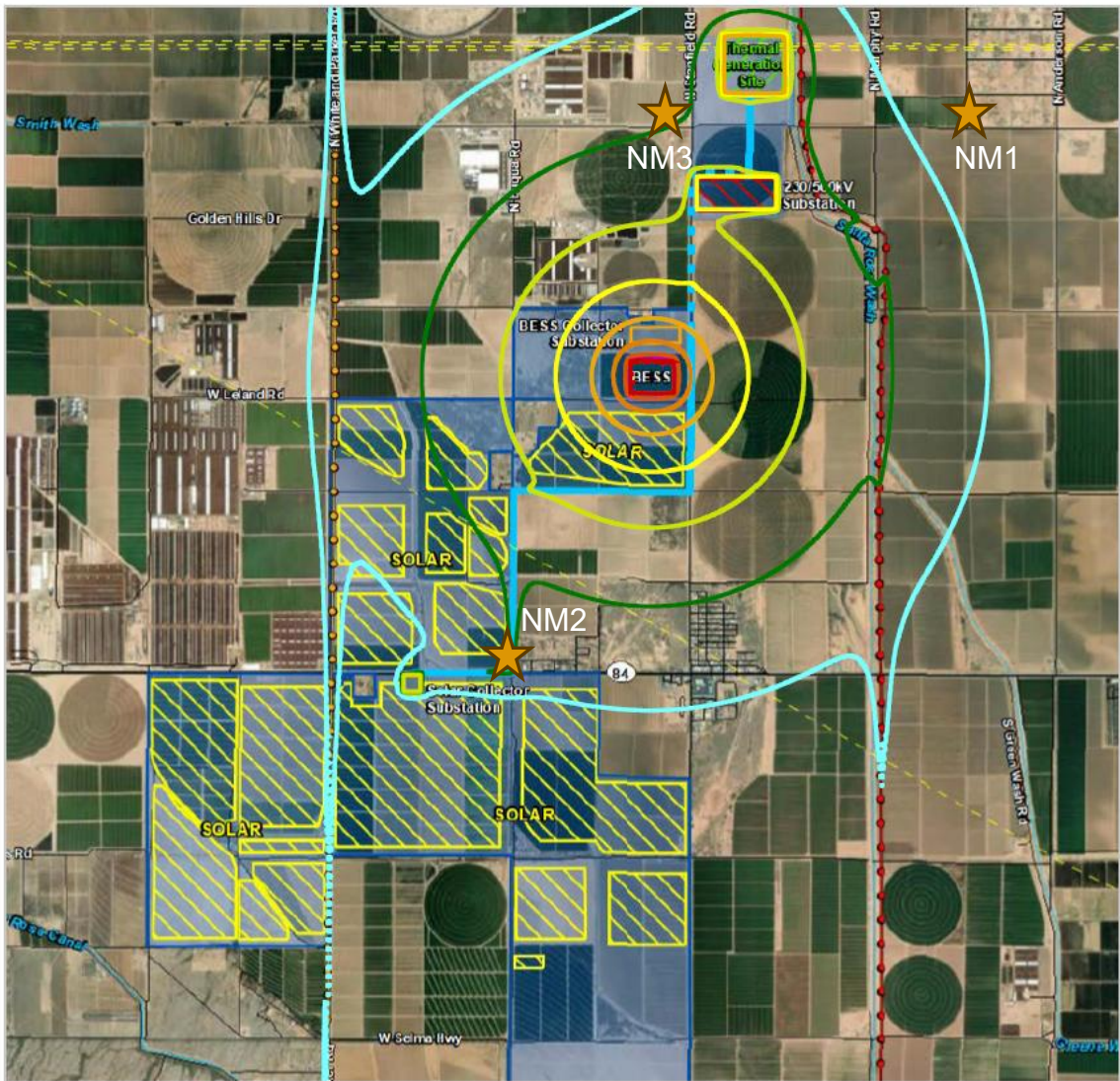
The Marigold site is historically agricultural; transitioning to solar, battery storage, and natural gas generation will significantly **reduce water use** compared to historical uses.

SRP is committed to water stewardship. Developing a **sustainable, responsible water resource plan** will be a top priority throughout the project.



Noise Study

Noise Study Results



★ Ambient Noise model site

Source: Hearing Health Foundation

Noise Study Results

TABLE 3: MODELED EXTERIOR NOISE LEVELS FROM OPERATIONAL SOURCES

Monitoring Site	Time Period	Modeled Noise Levels (A)	Ambient Noise Levels (B)	Modeled plus Ambient (C) (A+B)	Potential Noise Increase Above Ambient (C-B)	Exceeds Pinal County Daytime Limit?	Exceeds Pinal County Nighttime Limit?
		dBA					
NM1	Daytime	30.5	62.7	62.7	0.0	No ¹	–
	Nighttime	30.5	59.8	59.8	0.0	–	No ¹
NM2	Daytime	33.8	59.8	59.8	0.0	No ²	–
	Nighttime	33.8	54.7	54.7	0.0	–	No ²
NM3	Daytime	35.1	51.4	51.5	+0.1	No ¹	–
	Nighttime	35.1	51.4	51.5	+0.1	–	No ¹

Note:

¹ Located within the Rural Zoning District, daytime (7am-9pm) limits is 65 dBA and nighttime (9pm-7am) limits is 60 dBA.

² Located within the Residential Zoning District, daytime (7am-8pm) is 60 dBA and nighttime (8pm-7am) limits is 55 dBA.

Source: Refer to **Appendix 2.0** for SoundPLAN Output Sheets.

Average listeners noticeably detect a difference of about **3 dB** in signal to noise ratio (SNR)

Source: Study published in PubMed

At nearest residences there is no discernable difference in noise

Siting, Engagement, Environmental and Regulatory Process

Statutory Requirements: Environmental

Air Quality

Biological Resources

Cultural and Historical Resources

Geology and Soils

Hydrology

Land Use

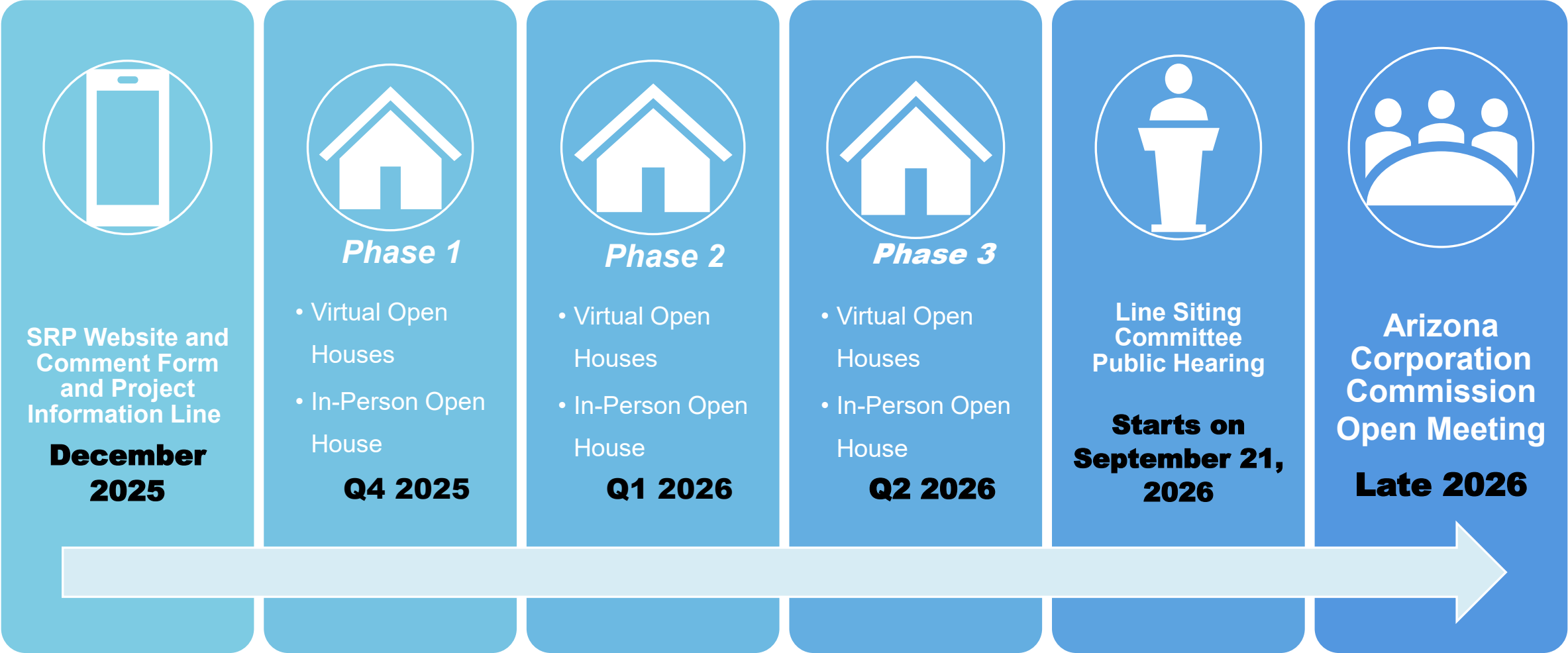
Noise

Recreation

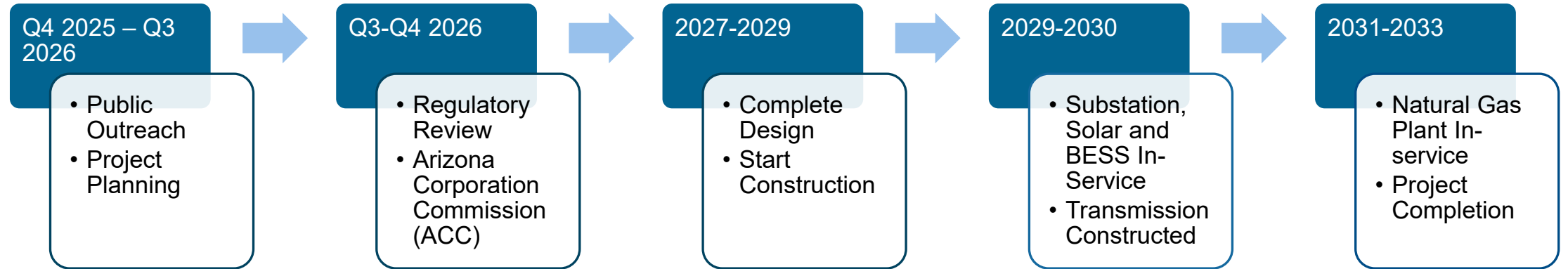
Visual and Aesthetics



Opportunities for Public Input



Preliminary Schedule



Arizona Corporation Commission (ACC) Siting Process



File application
for a Certificate of
Environmental
Compatibility (CEC)

**Anticipated Mid
August 2026**



**Line Siting Committee
Public Hearing**
(30-60 days after filing CEC
application)

**Starts on September
21, 2026**



**ACC
Open Meeting**
(30-60 days after Siting
Committee Decision)

Q4 2026



Fire and Risk Alliance

SRP is working with the Fire and Risk Alliance to plan for Emergency Management and provide information to the public regarding fire safety

Community Support

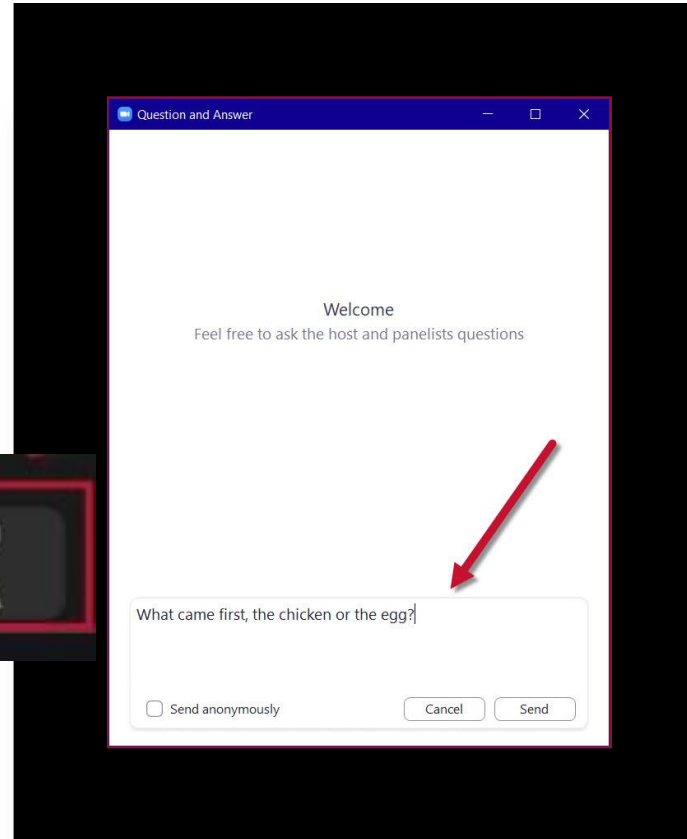
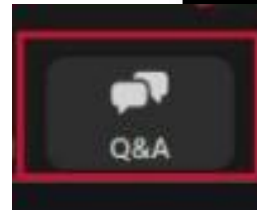
Stanfield Community Support

- Active member of the monthly *Stanfield Breakfast with Business Leaders* meeting
- Recognized *Stanfield Elementary School* teachers through employee appreciation gifts
- Supported the *Desert Senita Health Fairs*
- Engaged in the *Stanfield Elementary School's Halloween Pumpkin Contest* and sponsored prizes for the students
- Hosted a booth at the *Stanfield Elementary School's Family Literacy Night* educating on energy efficiency
- Hosting an *SRP Powering Our Future Workshop* in April at Stanfield Elementary School for all teachers. Each participant receives professional development hours and a grant for their classroom

We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*



www.srp.net/marigold
1-602-236-2872

thank you!

EXHIBIT J-3C
PHASE 3

MARIGOLD OPEN HOUSE #3 SUMMARY

Summary

SRP hosted the third in a series of Open Houses for the Marigold Project at Stanfield Elementary School on July 28, 2026, from 5:00-7:00pm. SRP partnered with ED3, NextEra Energy, and Fire and Risk Alliance, to engage the community and receive feedback. There were 23 participants throughout the evening.

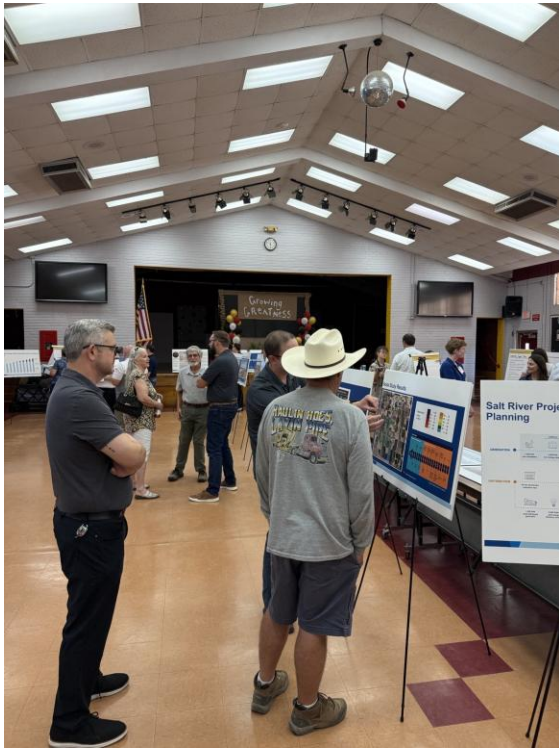
Project stations included:

- Project Overview
- Engineering & Construction
- Siting, Engagement, Environmental & Regulatory Process
- Interactive GIS Station (To map stakeholder location in comparison to project location)
- SRP Water Resources
- Electrical District No. 3 (ED3 representatives present at station)
- NextEra Energy
- Project RETI (Soft Intro)
- Community Support *
- Noise Study
- Fire and Risk Alliance (Evan Balcombe)
- Visual screen activities/Comment Area *
- Community members were invited to engage in two activities to provide input on visual mitigation for the gas generation site(putting a sticker on the chart by the type of mitigation they would prefer) and solar generation site (highlighting where they would like to see vegetative screening).
- Kids Zone

Community members raised concerns including ongoing community support, visual mitigation of the project, solar decommission, and more infrastructure coming into the community. However, they valued the opportunity to share their perspectives on the project.



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Visual Mitigation Activity- Solar

Marigold Energy Center Project

SOLAR VISUAL SCREENING ACTIVITY

NAME:

Jan Paw-Vicare

PROPERTY ADDRESS:

Parcel 500 11-030X0
5 miles South of Marigold Site

CONTACT INFORMATION (OPTIONAL):

602/980-8326

SCREENING NOTES/ FEEDBACK:

Like mixed greenery/trees
& warm lighting

Excellent. Representatives presenting the various
aspects of the Marigold Project - Very Informative

DIRECTIONS:

HIGHLIGHT THE LOCATION OF SUGGESTED VISUAL SCREENING

CIRCLE THE AREA OR RESIDENCE OR WORK

GREEN - LOCATION OF THE AREA

PINK - AREA OF WORK / RESIDENCE

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan, community feedback plays an important role in helping identify screening priorities and opportunities.



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Marigold Energy Center Project

SOLAR VISUAL SCREENING ACTIVITY

NAME:

LENDRE BROWN (D&K LLC)

PROPERTY ADDRESS:

I-8 WEST OF WHITE/PARKER

CONTACT INFORMATION (OPTIONAL):

LENDRE@D&KLLC.COM

SCREENING NOTES/ FEEDBACK:

MIXED VEGETATION

DIRECTIONS:

HIGHLIGHT THE LOCATION OF SUGGESTED VISUAL SCREENING

CIRCLE THE AREA OR RESIDENCE OR WORK

GREEN - VEGETATION SCREENING

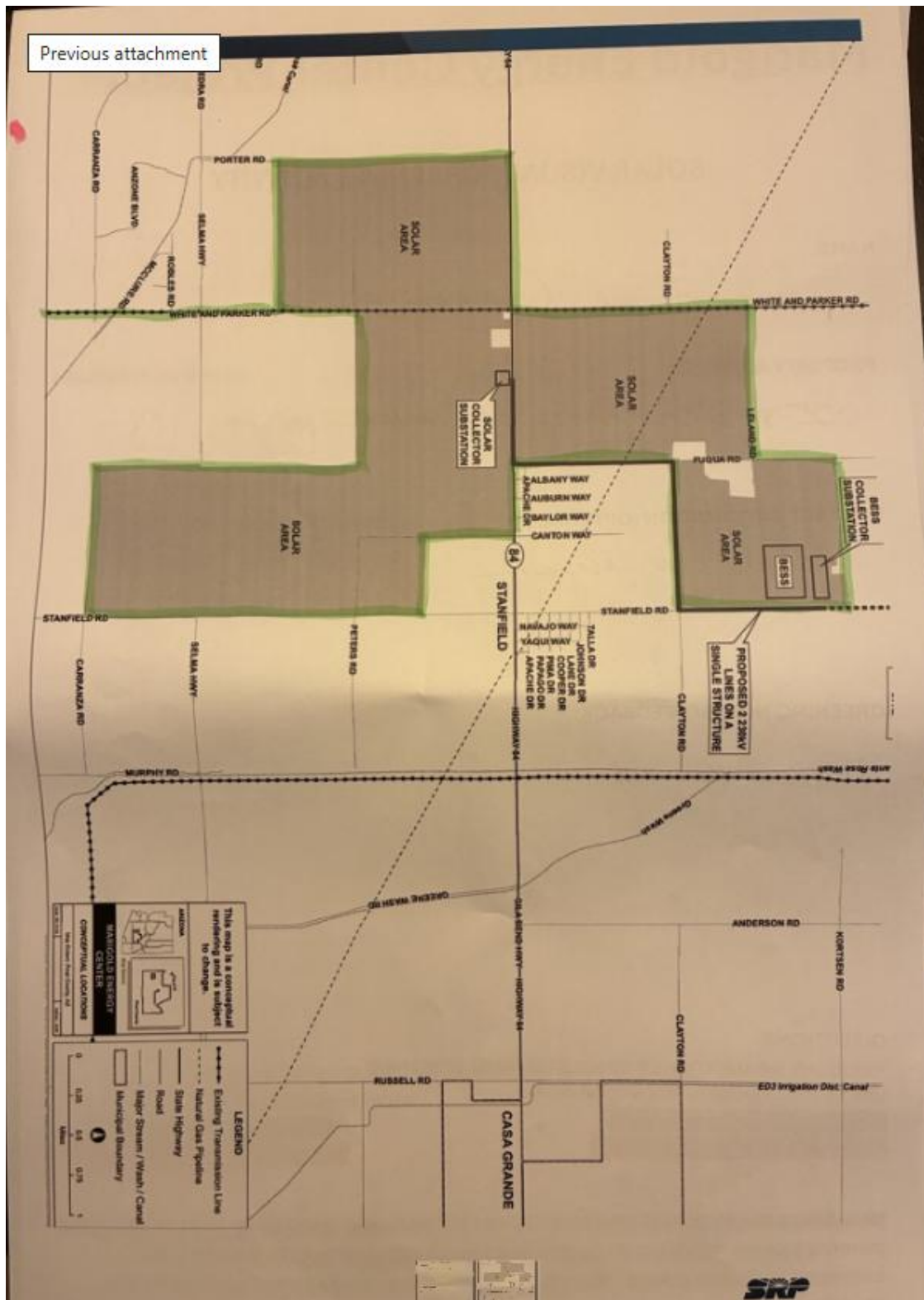
PINK - AREA OF WORK / RESIDENCE

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan, community feedback plays an important role in helping identify screening priorities and



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Previous attachment



Marigold Energy Center Project

SOLAR VISUAL SCREENING ACTIVITY

NAME: *Kim Dorraste*

PROPERTY ADDRESS: *11981 N. Laram Ln. 85139*
My company services the entire area on this map.

CONTACT INFORMATION (OPTIONAL):

Kimberly.D@poncorosabb.com

SCREENING NOTES/ FEEDBACK:

See above

I believe that if the solar field is going on, it will have an impact on the environment. Replacing the natural landscape will give ^{displaced} animals back their natural habitat.

DIRECTIONS:

HIGHLIGHT THE LOCATION OF SUGGESTED VISUAL SCREENING

CIRCLE THE AREA OR RESIDENCE OR WORK

GREEN - VEGETATION SCREENING

PINK - AREA OF WORK / RESIDENCE

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. Your input will be incorporated into the final plan.



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Marigold Energy Center Project

SOLAR VISUAL SCREENING ACTIVITY

NAME: *Virginia McManey*

PROPERTY ADDRESS: *Boleto 8 Papago*

CONTACT INFORMATION (OPTIONAL):

SCREENING NOTES/ FEEDBACK:

Screening along the main roads would be beneficial for the community.

DIRECTIONS:

HIGHLIGHT THE LOCATION OF SUGGESTED VISUAL SCREENING.
CIRCLE THE AREA OR RESIDENCE OR WORK.

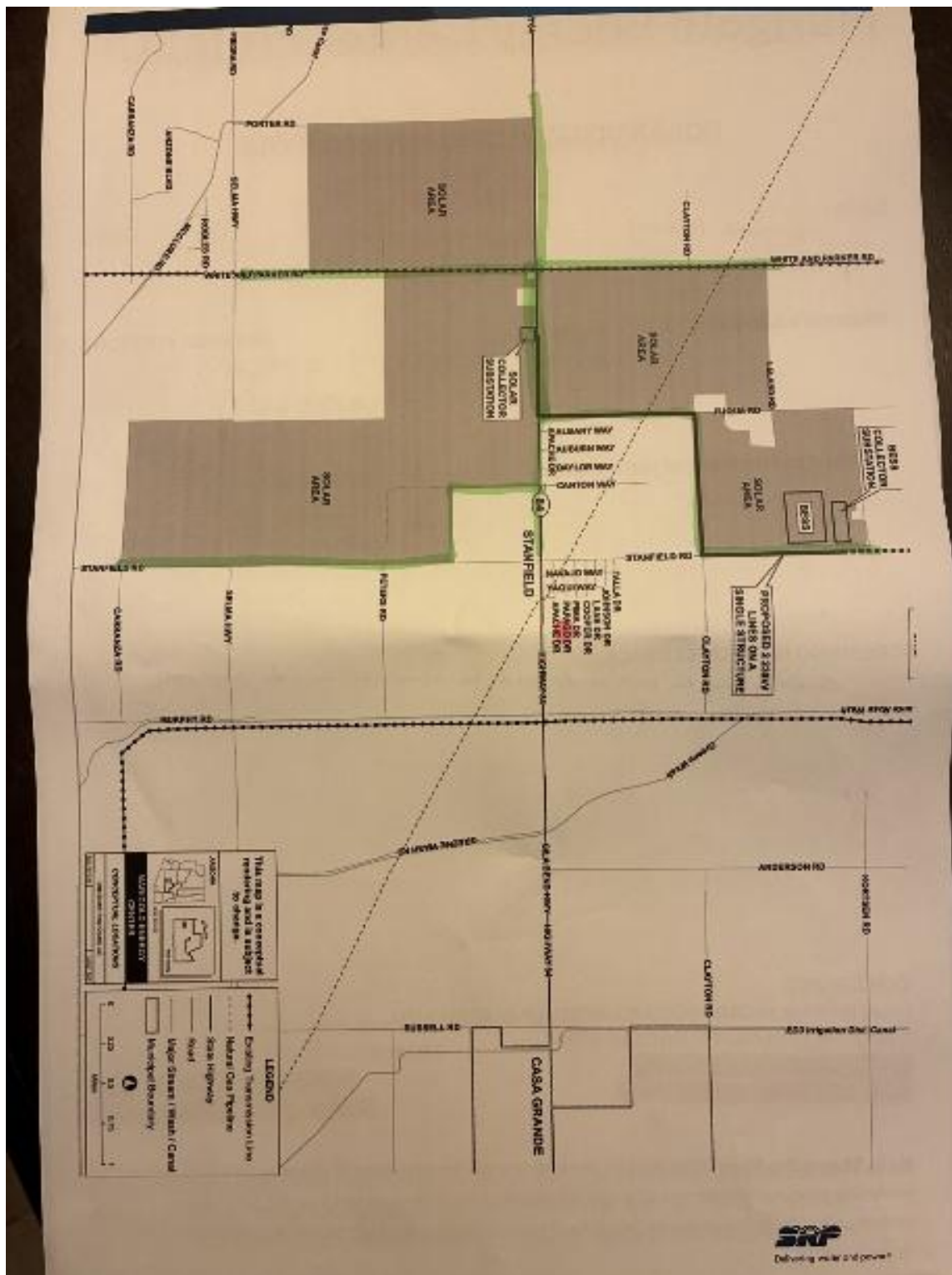
GREEN - VEGETATION SCREENING

PINK - AREA OF WORK / RESIDENCE

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan, community feedback plays an important role in helping identify screening priorities and



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Marigold Energy Center Project

SOLAR VISUAL SCREENING ACTIVITY

NAME: Susan Buonsante

PROPERTY ADDRESS:

57325 W. Enchanted Sunrise Ln.
Maricopa AZ 85139

CONTACT INFORMATION (OPTIONAL):

303 245 3711

SCREENING NOTES/ FEEDBACK:

* Please add me to PACC mailing list.
susan@belaPropertyBoutique.com

Located in Hidden Valley

Anything to lower the visual impact of
the view of solar & gas plants.

DIRECTIONS:

HIGHLIGHT THE LOCATION OF SUGGESTED VISUAL SCREENING

CIRCLE THE AREA OR RESIDENCE OR WORK

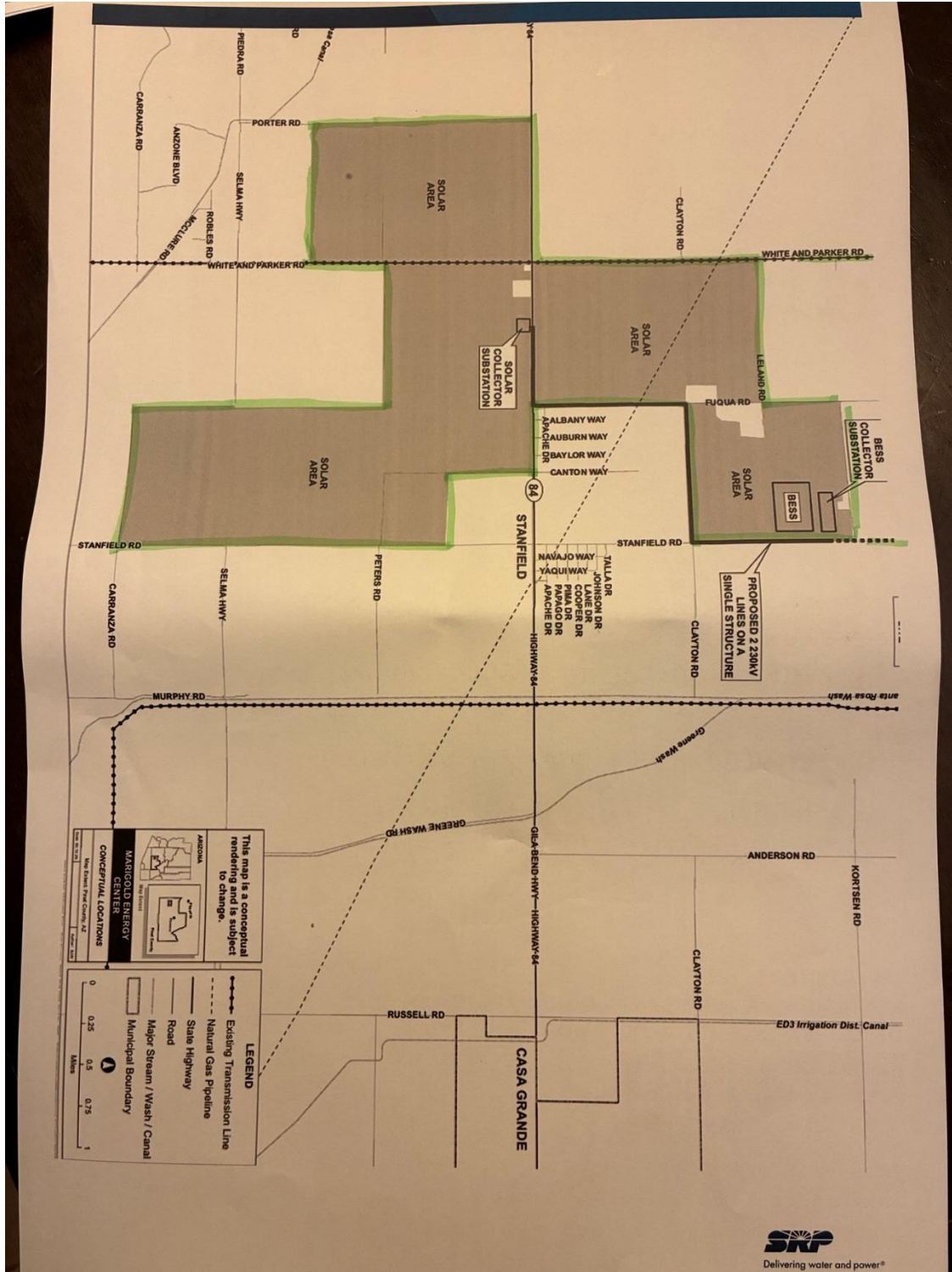
GREEN - VEGETATION SCREENING

PINK - AREA OF WORK / RESIDENCE

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan.



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Visual Mitigation Activity- Gas

Natural Gas Plant – Visual Mitigations Activity

Vegetation Screening Options	Trees	Shrubs	Both	No Vegetation
Lighting Types	Task Lighting	Directional / Cutoff / Shielded Fixtures	Low Intensity (Brightness levels)	No Preference
Stack Color	Matte Black	Matte Tan	Matte Brown	Matte Gray
Lighting Color	Warm	Neutral White	Cool White	No Preference

Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan, community feedback plays an important role in helping identify visual mitigation preferences.

Stack Color Examples

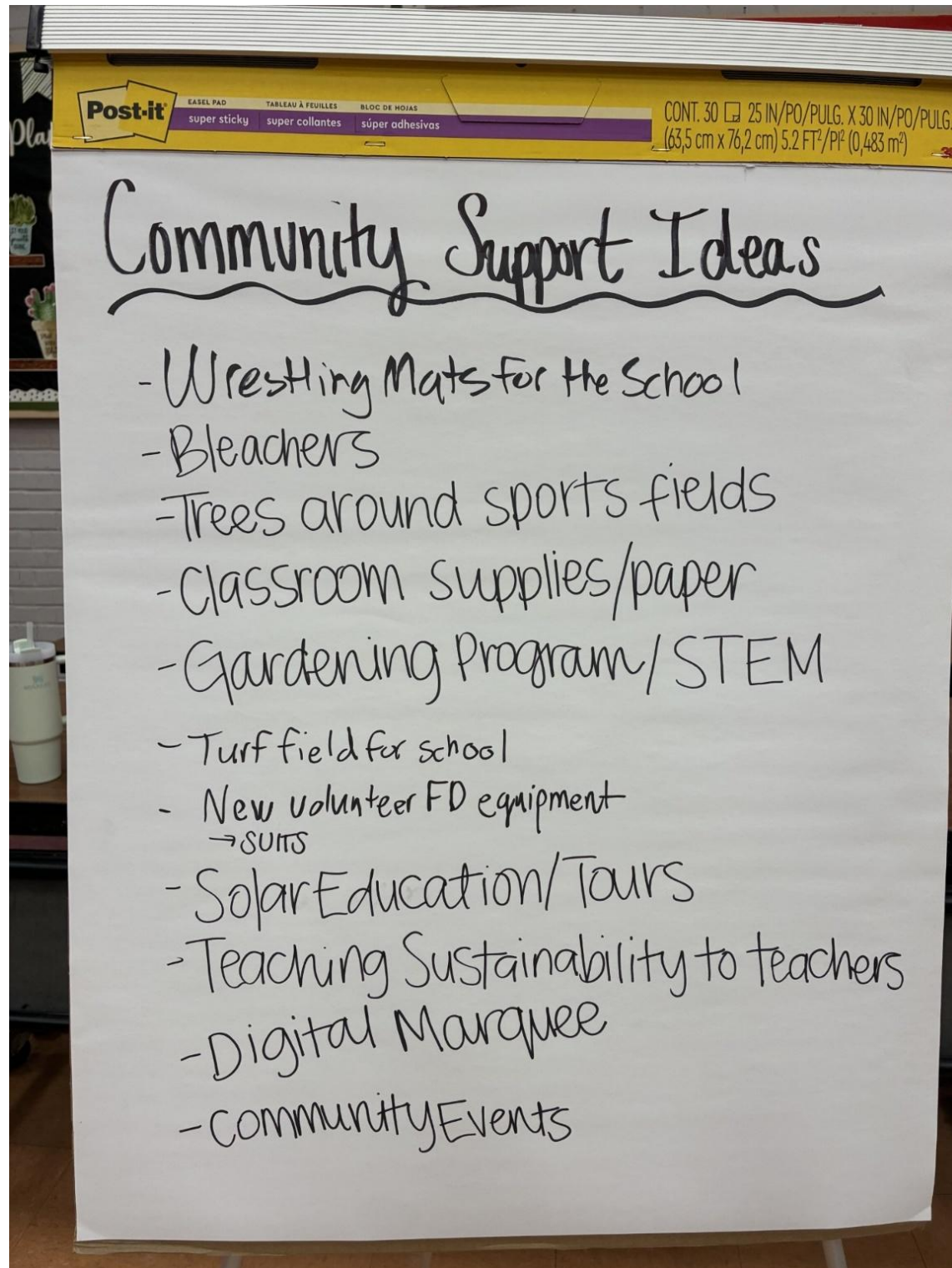


Lighting Color Examples



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Community Support Ideas



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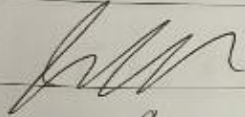
Sign In (23)

Open House 7/28 Sign In	
Name	Email
William Coccia, P.E.	dnacivil.cg@gmail.com
Cynthia Collins	
Drew Williams	drew.in.feng@gmail.com
Kari Woodward	Kari@d-3.org
Omaira Villanueva	Omaira.villanueva@d-3.org
Maurice Kerckhof	mo.kerckhof@gmail.com
Shane Garcia	mrsDSGarcia@gmail.com
Kim Donsife	kimberlyd@pandorasbb.com
Ronen Berechman	berechman@pm.me
Robin Davis	robindavis11369@outlook.com
Memo Romo	estimates@oprcconstruction.com
Owen Feenstra	



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Open House 7/28 Sign In

Name	Email
	
Matt N. Shore	mattnshore2013@gmail.com
	
LENDRE BROWN	LENDREB70@gmail.com
Virginia McHane	vmchaney8@gmail.com
Riley Erickson	rileyerickson2021@gmail.com
Ella Kaufman	ellaKaufman24@gmail.com
Zack Garcia	Z. Garcia 24G outlook.com
Jack Bur 25211	
Kelly Sarker	kelly.sarker@epicsthenary.com



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[illegible]

MARIGOLD VIRTUAL OPEN HOUSE #3 SUMMARY

Summary

SRP hosted the third in a series of virtual open houses for Marigold Energy Center on July 29, 2026, from 6:00 to 7:00 p.m. William Loper (SRP) and Sarah Justus (KPE) provided a project overview followed by an interactive Q&A session where Trevor Thompson (Nextera Energy) and Evan Balcombe (Fire & Risk Alliance) joined to answer questions.

Attendees: 17

Attendees from SRP, KPE, Fire & Risk Alliance and Nextera were excluded from this list.

Name (original name)	Email	Total duration (minutes)
HORST SCHMIDT	horsthear@yahoo.com	73
Don	dateuter@hotmail.com	40
henry yun	henry.yun@epicstarenergy.com	11
4807103361	sethk@wholdings.com	71
Dawn Carpenter	dawn@mdnetworking.com	73
Alex Hughes	alex.hughes@hitachienergy.com	63
Art W	ayting76@gmail.com	56
AR Reese	stanfieldroad@yahoo.com	73
Peg Huffman	phuffman@mdpssc.org	23
Ed Maddox	ed_maddox@transalta.com	63
Tom Scott	tomscott@msequipment.com	62
Taera Kamei	gypsy7woman@gmail.com	58
Katy Wilson - TransAlta	katy_wilson@transalta.com	40
Ian Calkins	ian@copperstate.net	50
Sachin Rathi	sachin.crathi@gmail.com	68
Kari Woodward	kari.woodward@ed-3.org	72
Jesse Cohen	jcohen@balancedrockpower.com	21

Questions/Comments Received: 24

Topics included project infrastructure and design, environmental impacts, energy reliability, project financing and costs, community benefits and fire response and training.

Listed exactly as typed.

1. Will the new transmission line(s) be above ground or below ground?



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2. Proposed financing method?
3. Will it be necessary to include gas in the mix?
4. Has SRP evaluated whether construction and operation of the Marigold Energy Center will require improvements to Stanfield Road or the I-8 interchange?
5. Will the transmission infrastructure have additional capacity beyond the Marigold project that could support future industrial development in the Stanfield area?
6. How long is the project expected to take?
7. What is the anticipated construction schedule if the project receives all approvals?
8. Is the natural gas to be burned only as need for backup or will it be burning full time?
9. Has SRP determined how water will be supplied to the Marigold Energy Center?
10. Will the project require construction or extension of water infrastructure, such as new water lines, or is SRP evaluating other water sources?
11. Has anyone thought to ask the wildlife that presently occupies this area how they feel about this project?
12. Is it out of the question to ask human beings to give serious consideration to what they could give up in order to reduce utility use?
13. A few weeks ago at Pinal County Board of Supervisors meeting it was either SRP/NextEra offered the City of Coolidge a Grant of \$600,000. It was calculated at \$1500 per MW.
14. Will be providing a Grant for the Stanfield Community calculated at \$1500 per MW. So for this Marigold Project it would be $1675 \text{ MW} \times \$1500 = \$2,512,50....$ since a president has been set. will a Grant of this amount be available to the Stanfield Community?
15. What will you do with the Surplus Water that isn't used by your project? Will it be available for Stanfield Community and Agriculture uses? Or will it be left in the Aquifer?
16. Could you please provide the parcel numbers (APNs) for the land proposed for SRP's upcoming solar and other energy projects?
17. Have you thought about Creating a Community Park that would have a Swimming Pool, BBQ Facility, Pickle Ball Court, Equestrian Riding Area, Baseball or Softball Fields, Maybe 2 Fields, and a Large Grass are for local families to enjoy. Can you Fund and support Youth Summer Programs that will be available at the New Stanfield Community Park?
18. What specific financial or infrastructure benefits will Stanfield receive?
19. Will Stanfield customers receive lower electricity costs or improved reliability?
20. What battery-fire-response training and equipment will be provided to local fire departments? This is from safety perspective.
21. There is No Property Tax on BESS according to Arizona State Statute. The Property Tax that is Paid on the Solar Will be depreciated over 10 years only according to AZ State Statutes and not 25 Years as you represent...All of the Property Tax is Paid to the AZ State with only a Few Crumbs coming Back to the Local area. This is a proven fact and I can provide documentation from the Pinal County Assessor.
22. You are correct that each segment of your project has different Tax Rates.
23. Battery Fires are mitigated with water on the Neighboring BESS Containers. It has been said many times that Burning BESS are simple allowed to Burn Out spreading Toxins in the air according to NextEra?
24. Evan did a good job explaining a BESS fire, just wanted to acknowledge him for being clear and understandable.



Visual Mitigation Activity – Natural Gas

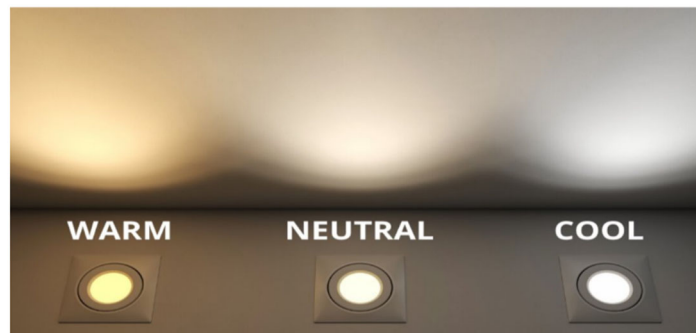
Participants: 1

Natural Gas Plant – Visual Mitigations Activity

<u>Vegetation Screening Options</u>	Trees	Shrubs	Both 	No Vegetation
<u>Lighting Types</u>	Task Lighting	Directional / Cutoff / Shielded Fixtures	Low Intensity (Brightness levels) 	No Preference
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Help Shape the Plan: Your recommendations will be reviewed and considered as part of the planning process. While not all suggestions may be incorporated into the final plan, community feedback plays an important role in helping identify visual mitigation preferences.

Lighting Color Examples



Stack Color Examples



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Marigold Energy Center

Open House

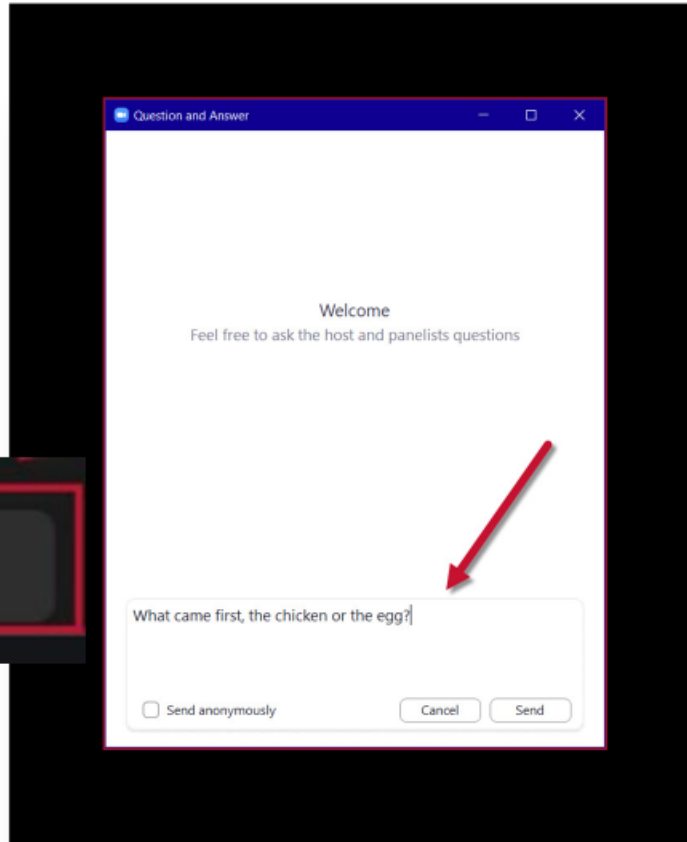
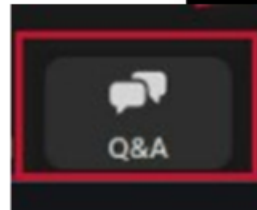
Agenda

- Introductions
- Project Overview Presentation
- Questions & Answers via Q&A Function

We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*

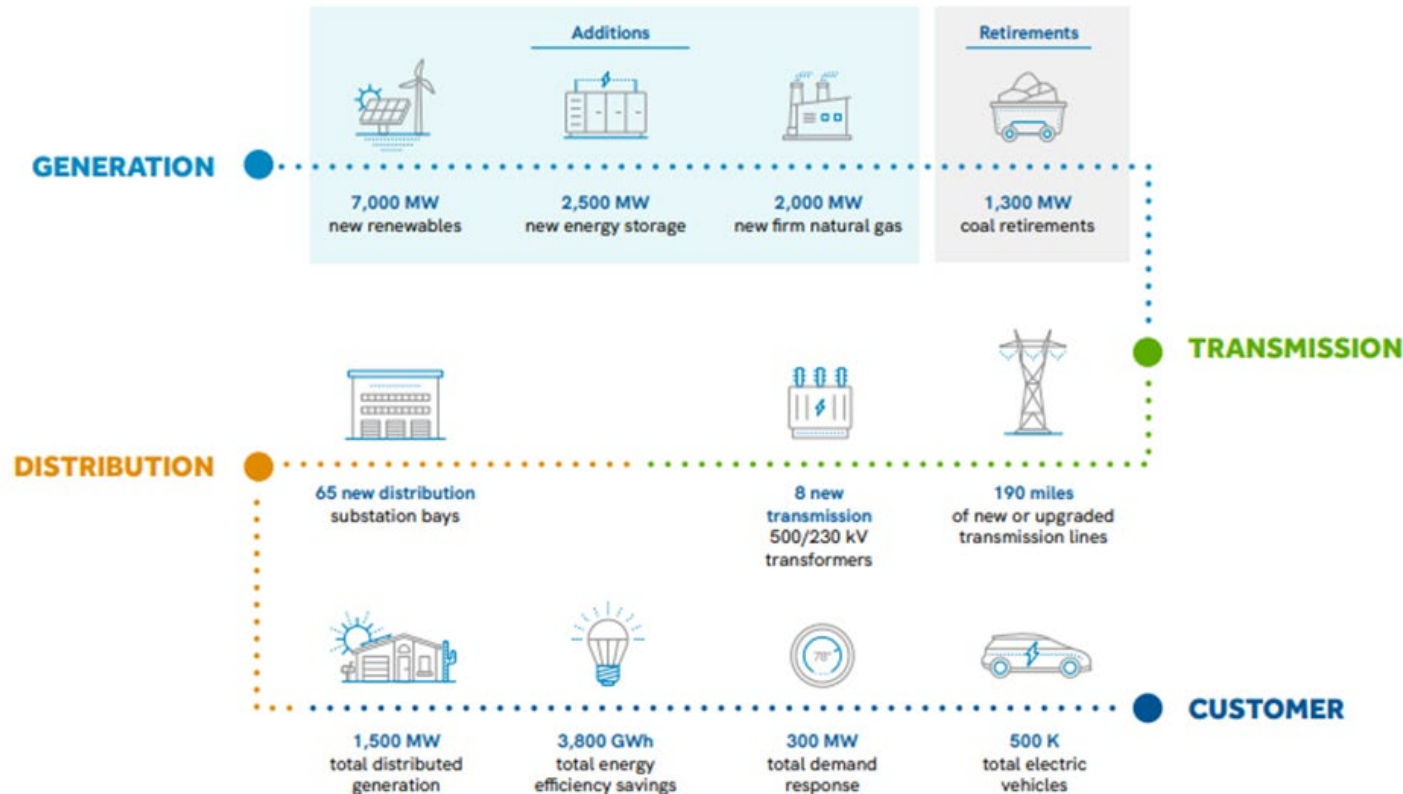


www.srp.net/marigold
1-855-584-1484

Purpose and Need

Salt River Project (SRP) – Integrated System Planning

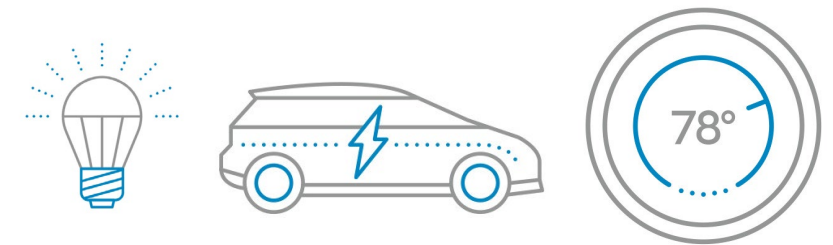
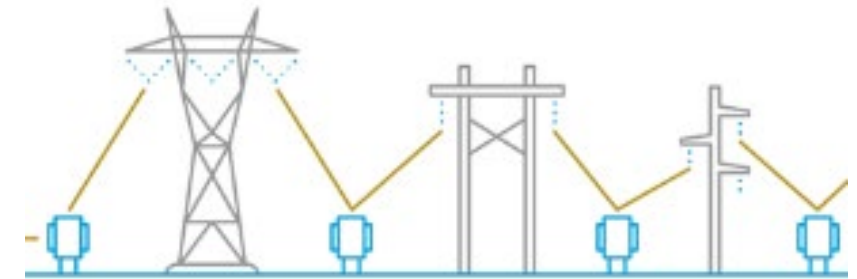
Solutions to Meet Growing Demand and Customer Needs



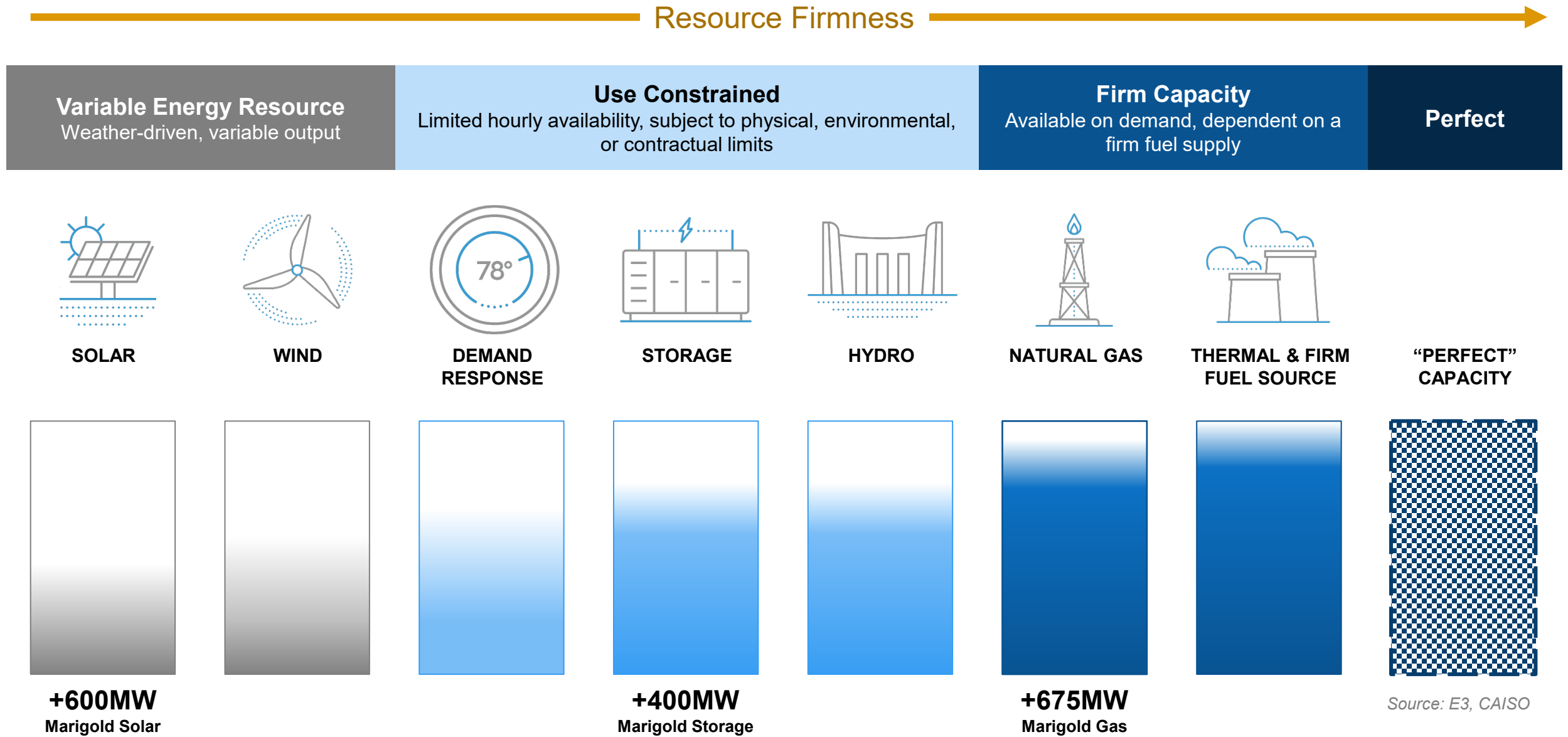
- ✓ Adding Generation
 - Renewable Energy
 - Storage
 - Firm Natural Gas
- ✓ Converting Coal Plants
- ✓ Upgrading Transmission Grid
- ✓ Expanding Distribution
- ✓ Growing Distributed Generation
- ✓ Energy Efficiency
- ✓ Demand Response
- ✓ Support Electrification

Key Takeaways from SRP's Integrated System Plan

- SRP will need to more than **double if not triple resource capacity** in the next decade
- Firm capacity **and** renewables are part of **least-cost portfolio** in all scenarios
- **Hundreds of miles** of transmission and **nearly twice** the transformers are needed
- SRP will need to **evolve programs and price plans** to shift consumer behavior

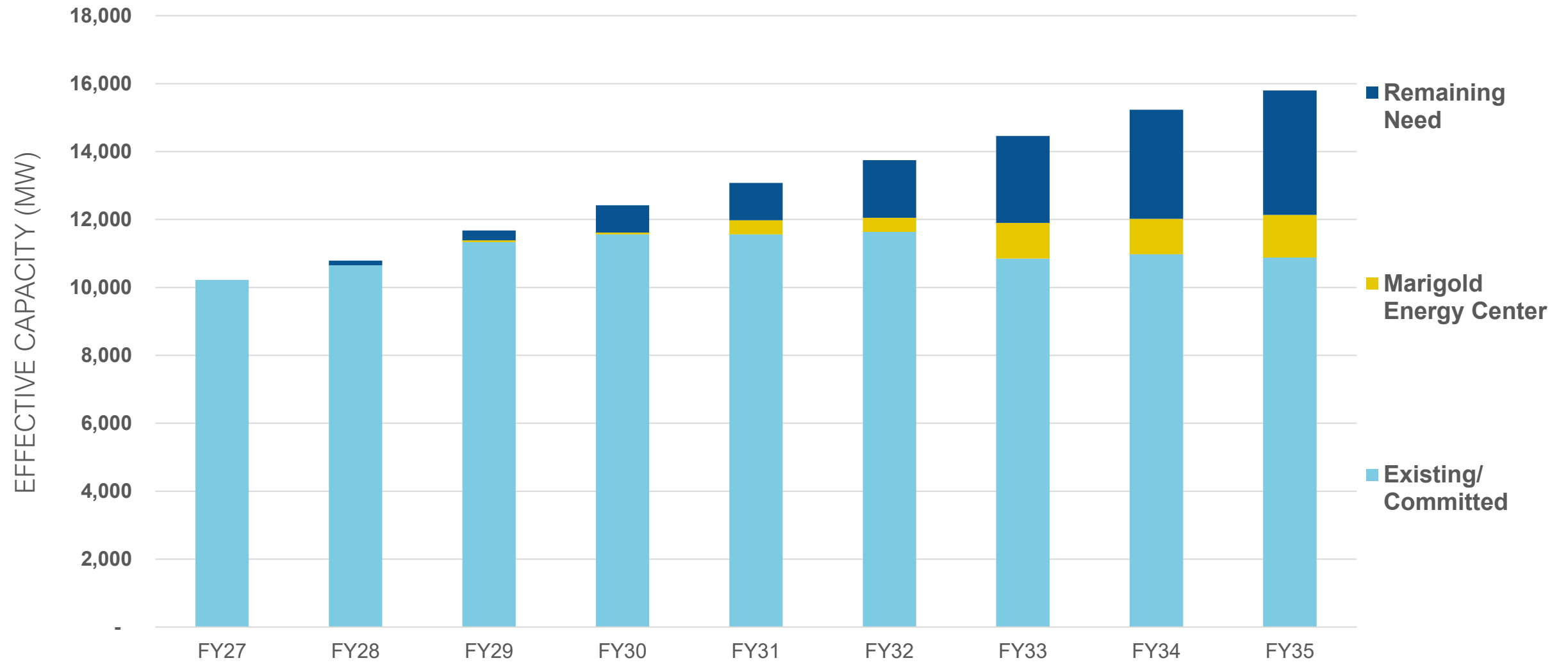


Resource Availability to Support Reliability



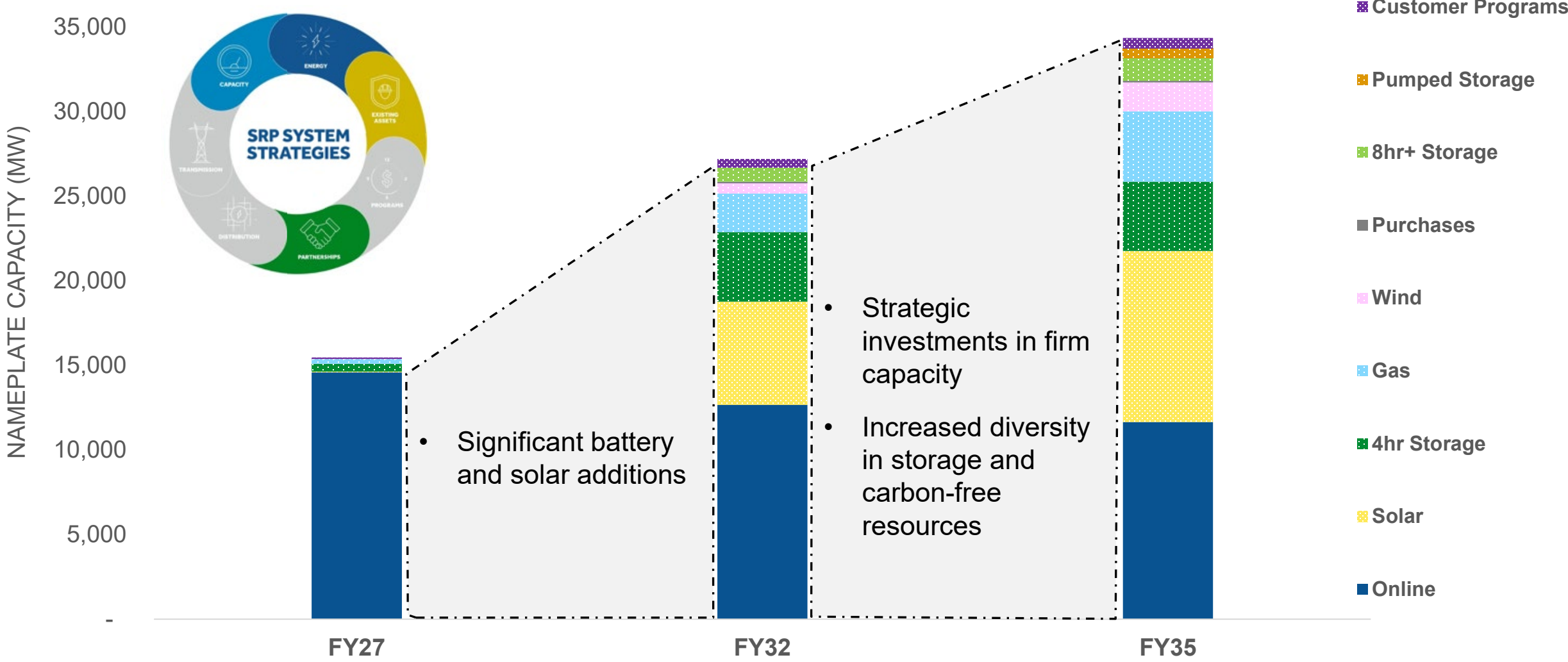
Source: E3, CAISO

Marigold Energy Center Helps Meet Summer Capacity Needs



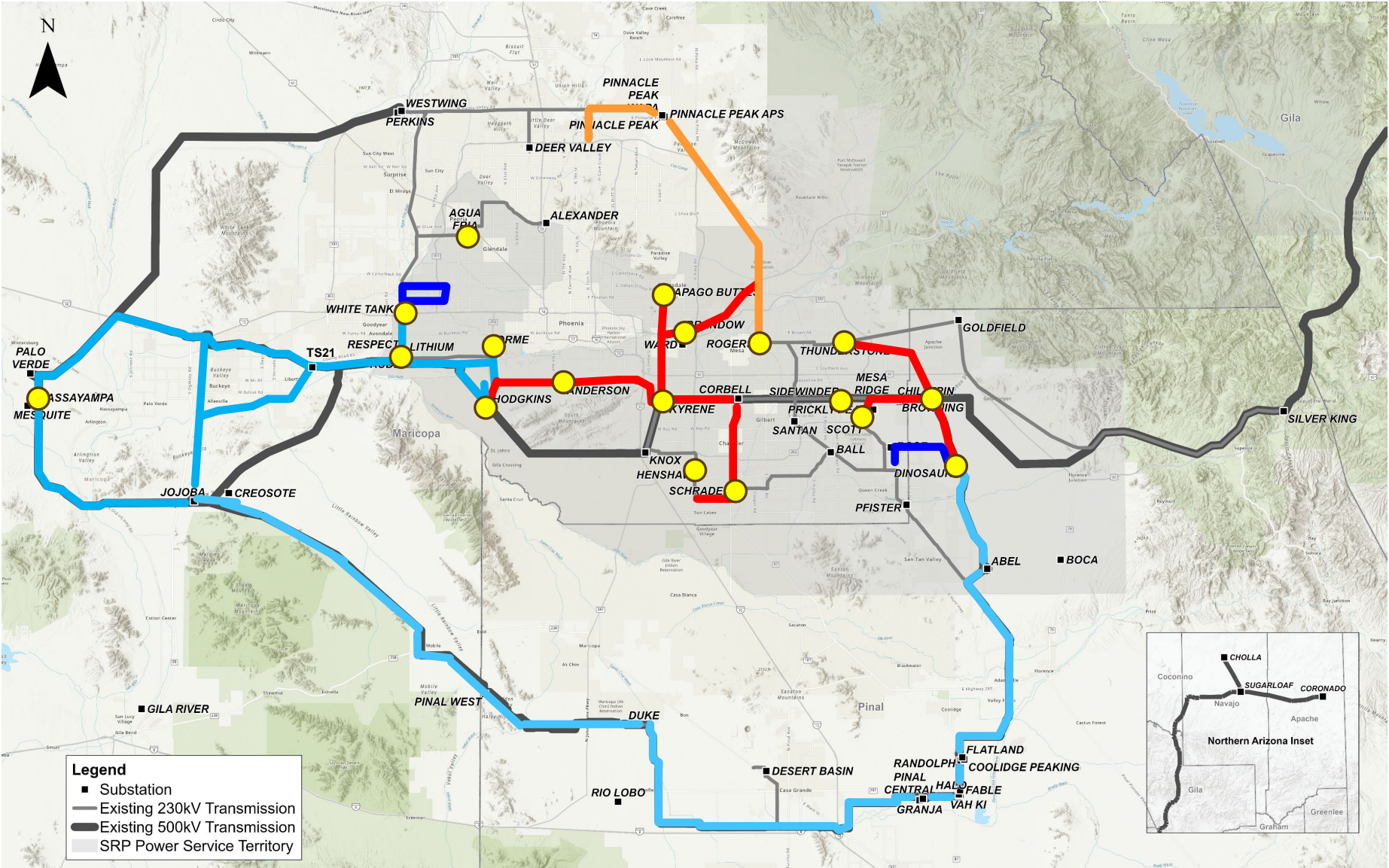
Fiscal Year 2027 Resource Plan Summary

RESOURCE ADDITIONS BY GENERATION TYPE



Transmission Upgrades

- Upgrade Line
- New Line (CEC)
- UG Load Loop & Projects Served
- Upgrade Line (Non-SRP)
- Identified System Needs



Pinal West - Pinal Central Transmission Project





Electrical District 3

ED3 is evaluating a potential partnership with SRP to procure a portion of the energy generated by the Marigold Energy Center, enhancing ED3's ability to serve local customers with reliable and competitively priced electricity.

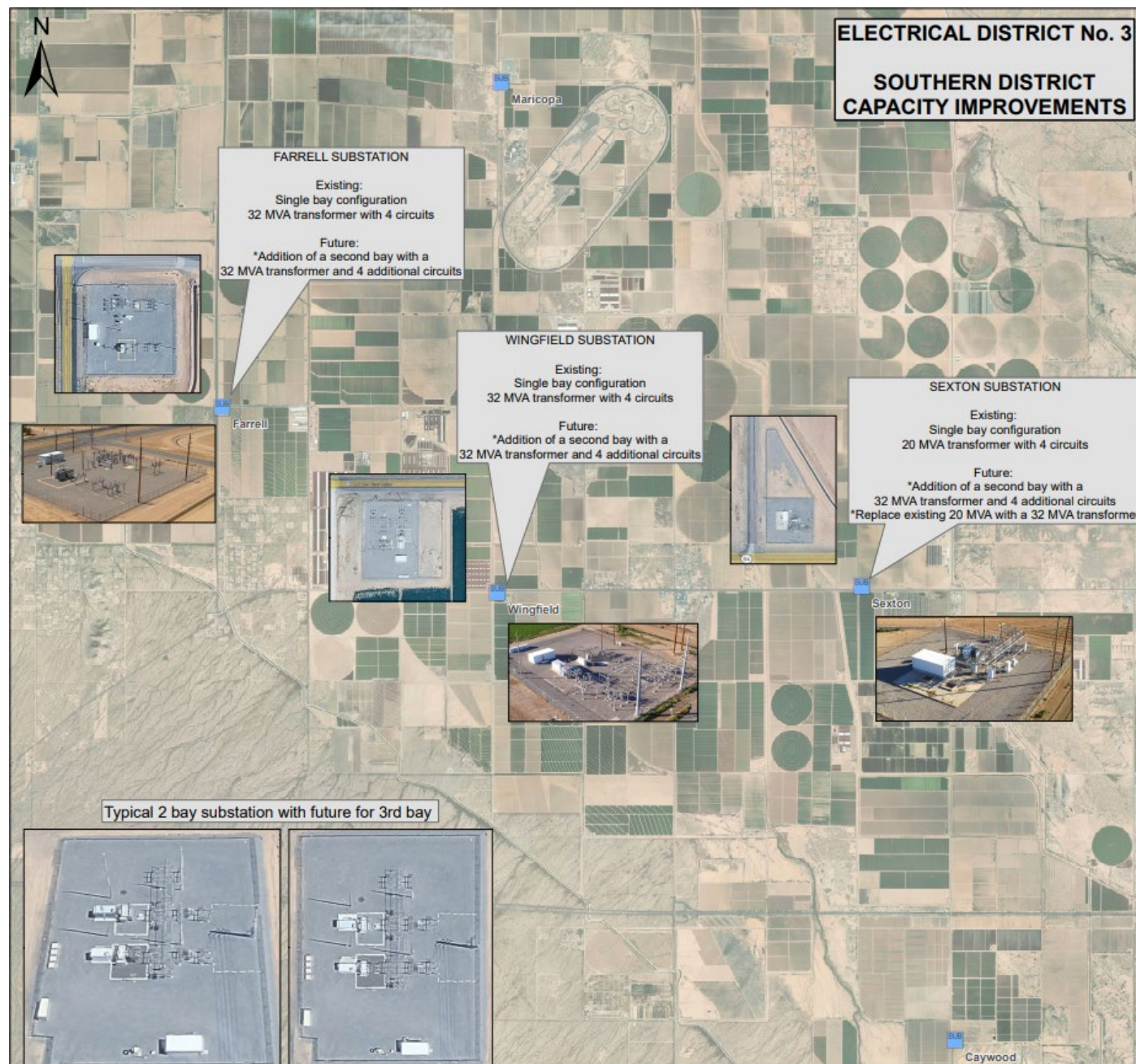


Tentative Operations
Date for Substation
Upgrades:

Wingfield Substation
– September 2027

Sexton Substation
– December 2027

Farrell Substation
– December 2028

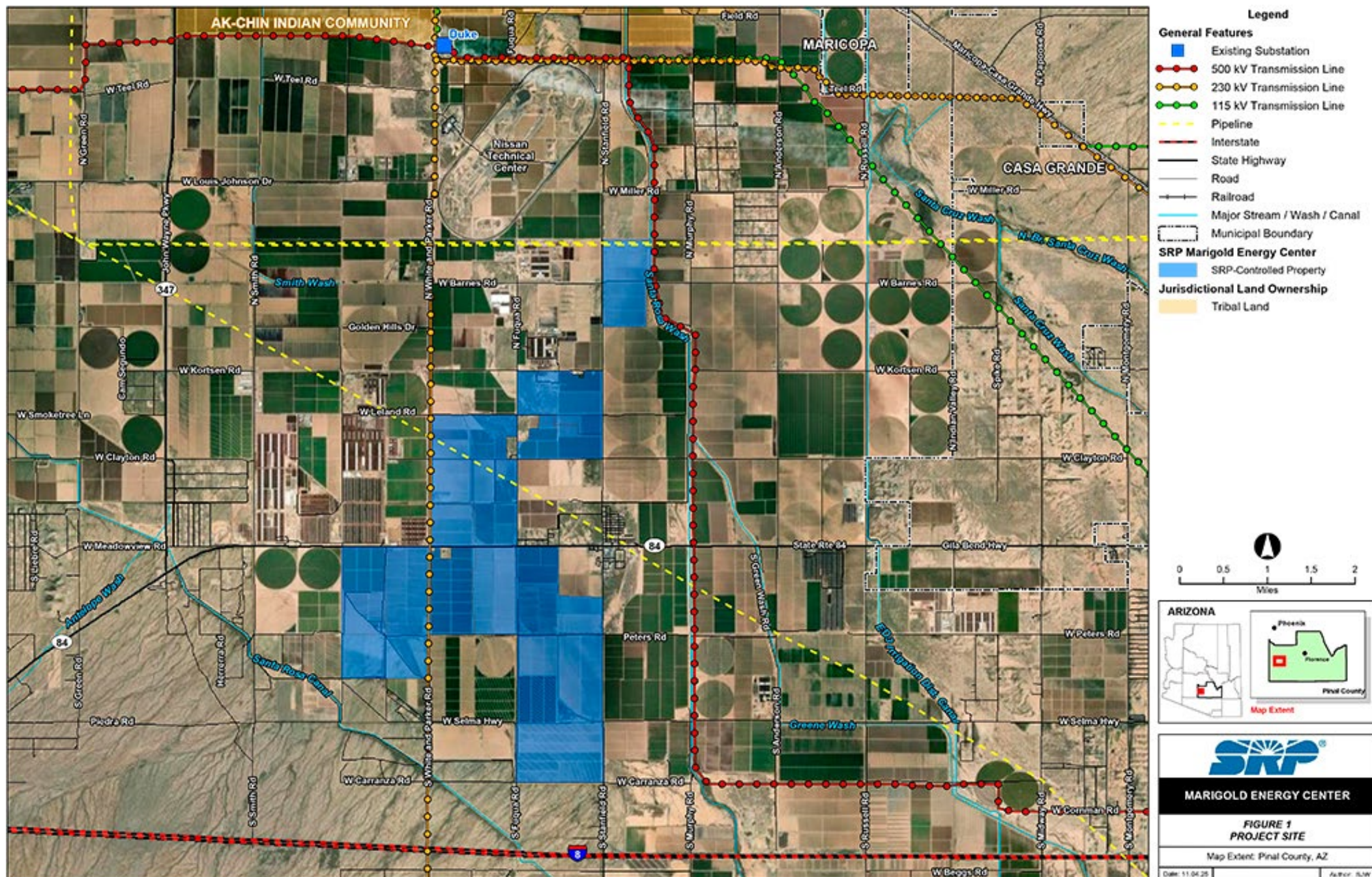


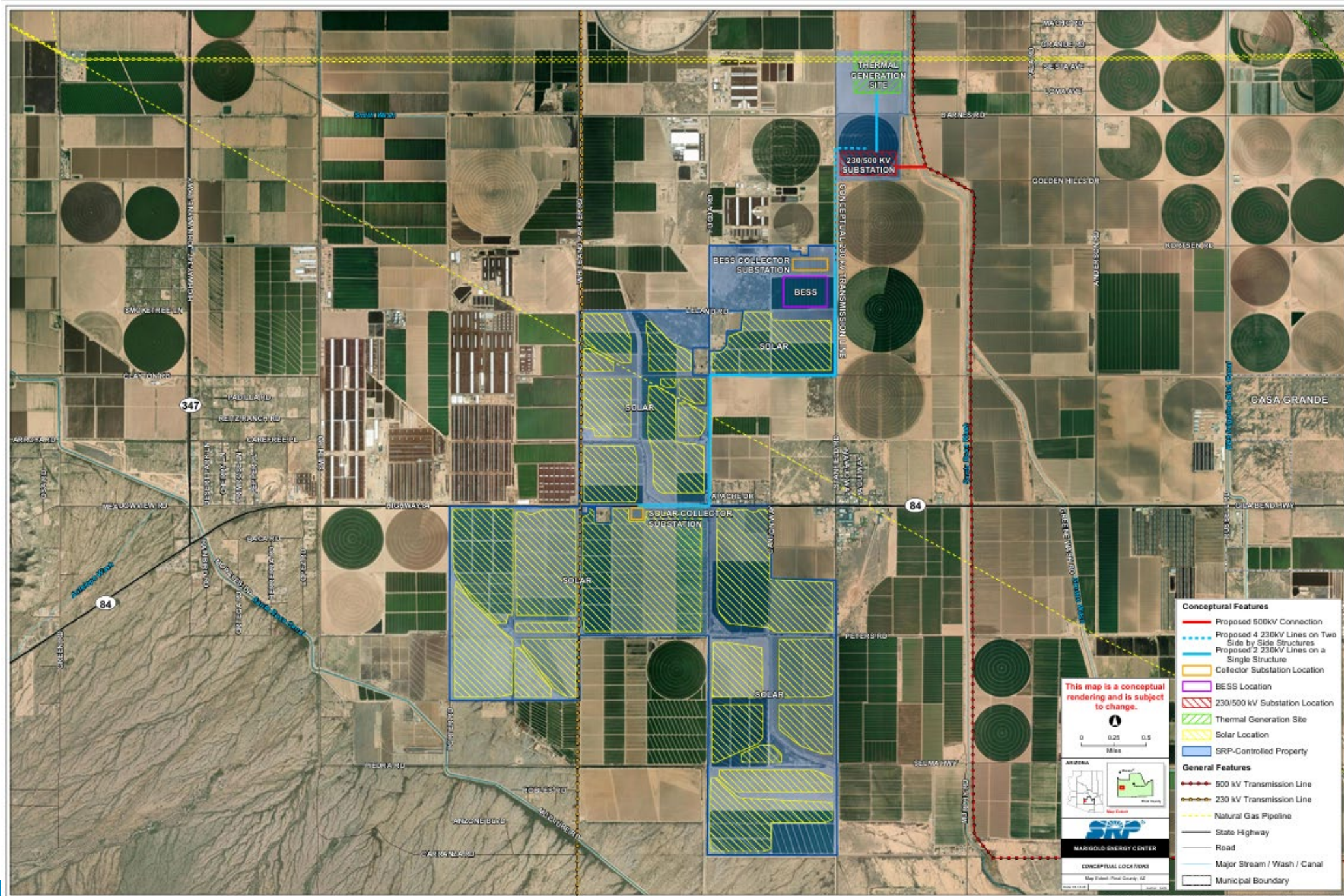
Southern Capacity Substation Improvement Projects are included in the 5-year capital improvement program plan for ED3 with investment totaling approximately \$14 million.

In January 2026, ED3 placed orders for long-lead time project elements for Wingfield Substation and Sexton Substation such as transformers and circuit breakers. Engineering design work for all three projects have been approved.

The projects improve both capacity and reliability for the southern area of ED3.

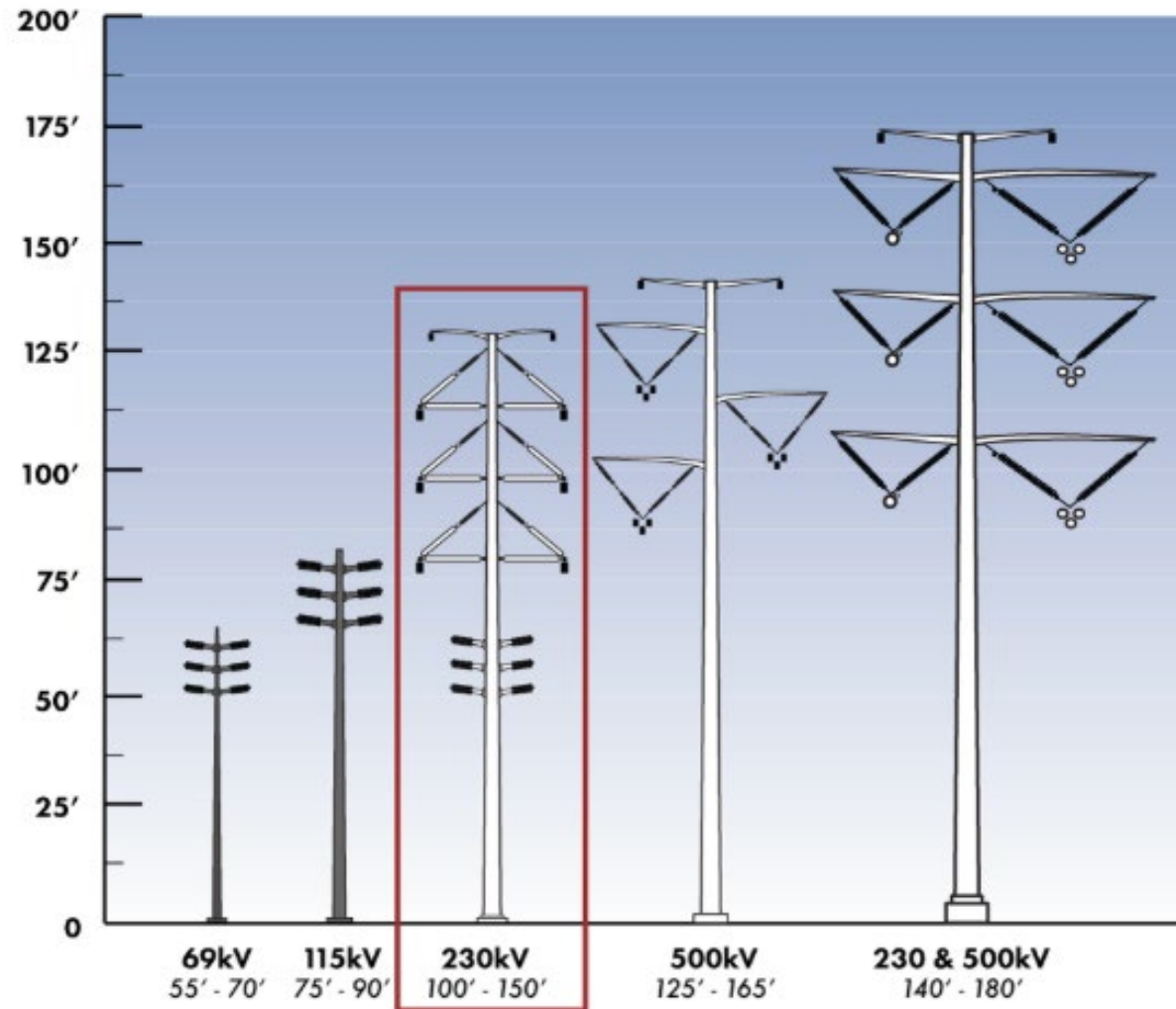
Proposed Project





Engineering and Construction

Typical Structure Types



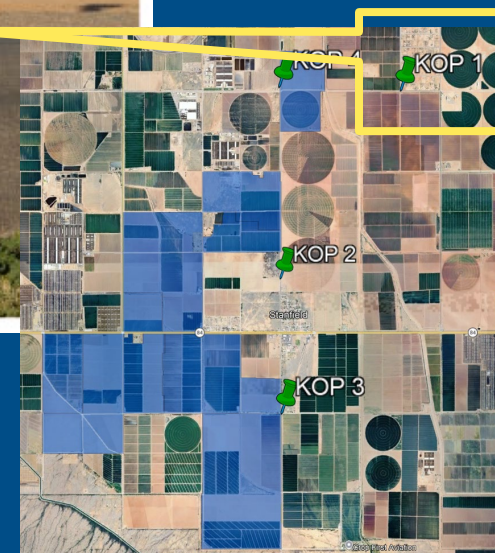
Represents SRP's typical structures. Actual structure types for this project have not yet been determined and may vary depending on location.

Project Simulation – Key Observation Point (KOP) 1



*Corner of Pala Road and Barnes Road
looking West*

Current Condition

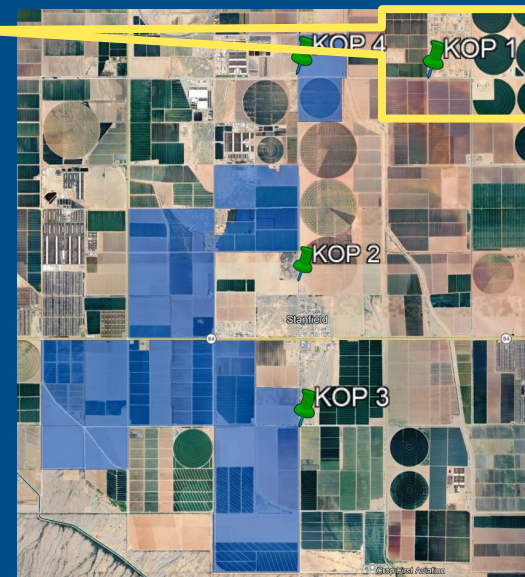


Project Simulation – Key Observation Point (KOP) 1



*Corner of Pala Road and Barnes Road
looking West*

Simulated Condition

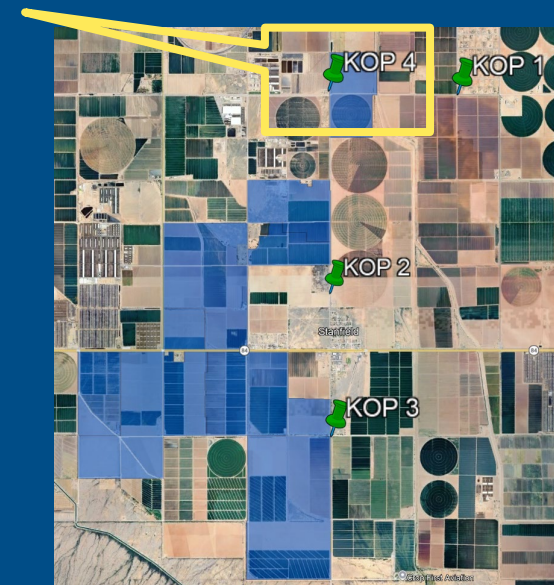


Project Simulation – Key Observation Point (KOP) 4



Corner of North Stanfield Road and Barnes Road looking Northeast

Current Condition



Project Simulation – Key Observation Point (KOP) 4



Road looking Northeast

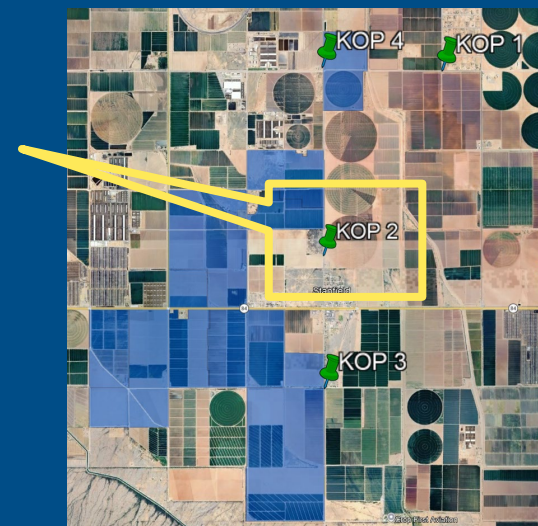
Simulated Condition

Project Simulation – Key Observation Point (KOP) 2



North Stanfield Road looking Northwest

Current Condition

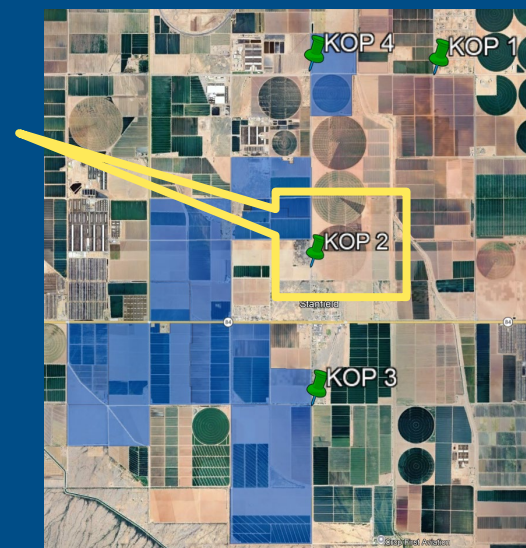


Project Simulation – Key Observation Point (KOP) 2



North Stanfield Road looking Northwest

Simulated Condition

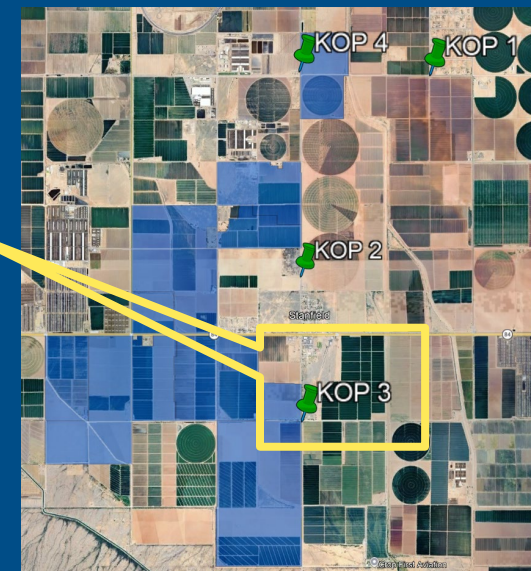


Project Simulation – Key Observation Point (KOP) 3



*North Fuqua Road & State Route 84 –
Looking Southwest*

Current Condition

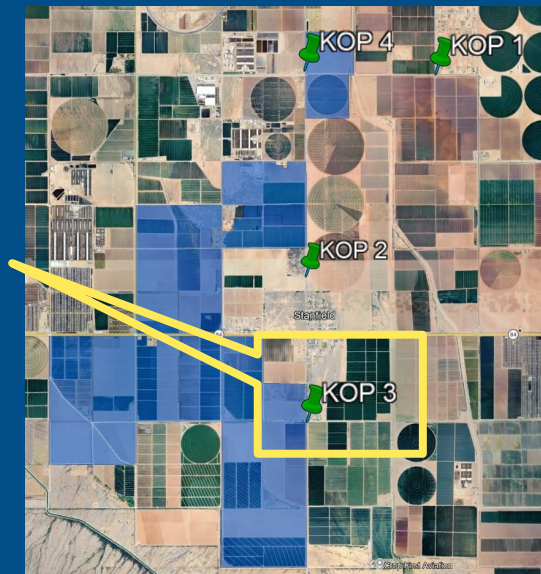


Project Simulation – Key Observation Point (KOP) 3



*North Fuqua Road & State Route 84 –
Looking Southwest*

Simulated Condition

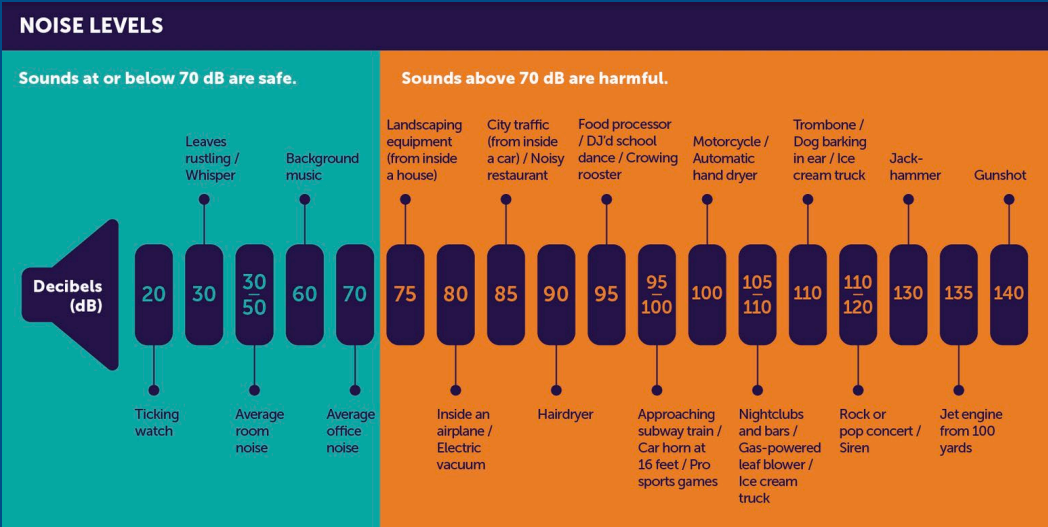
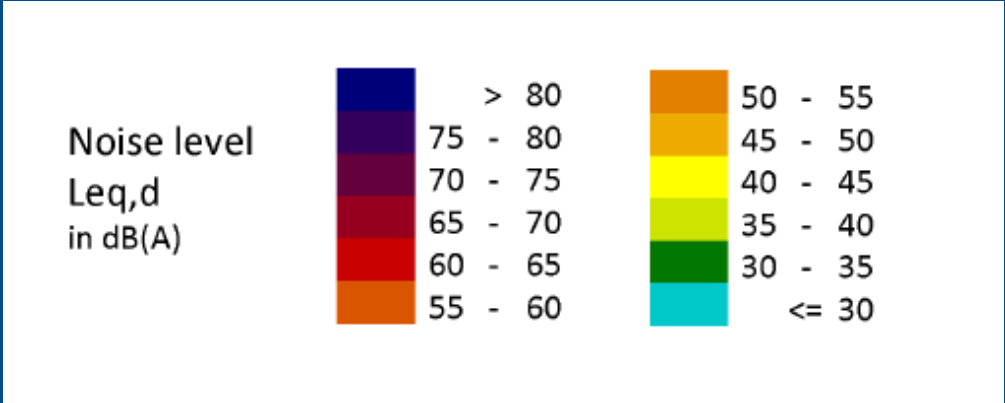
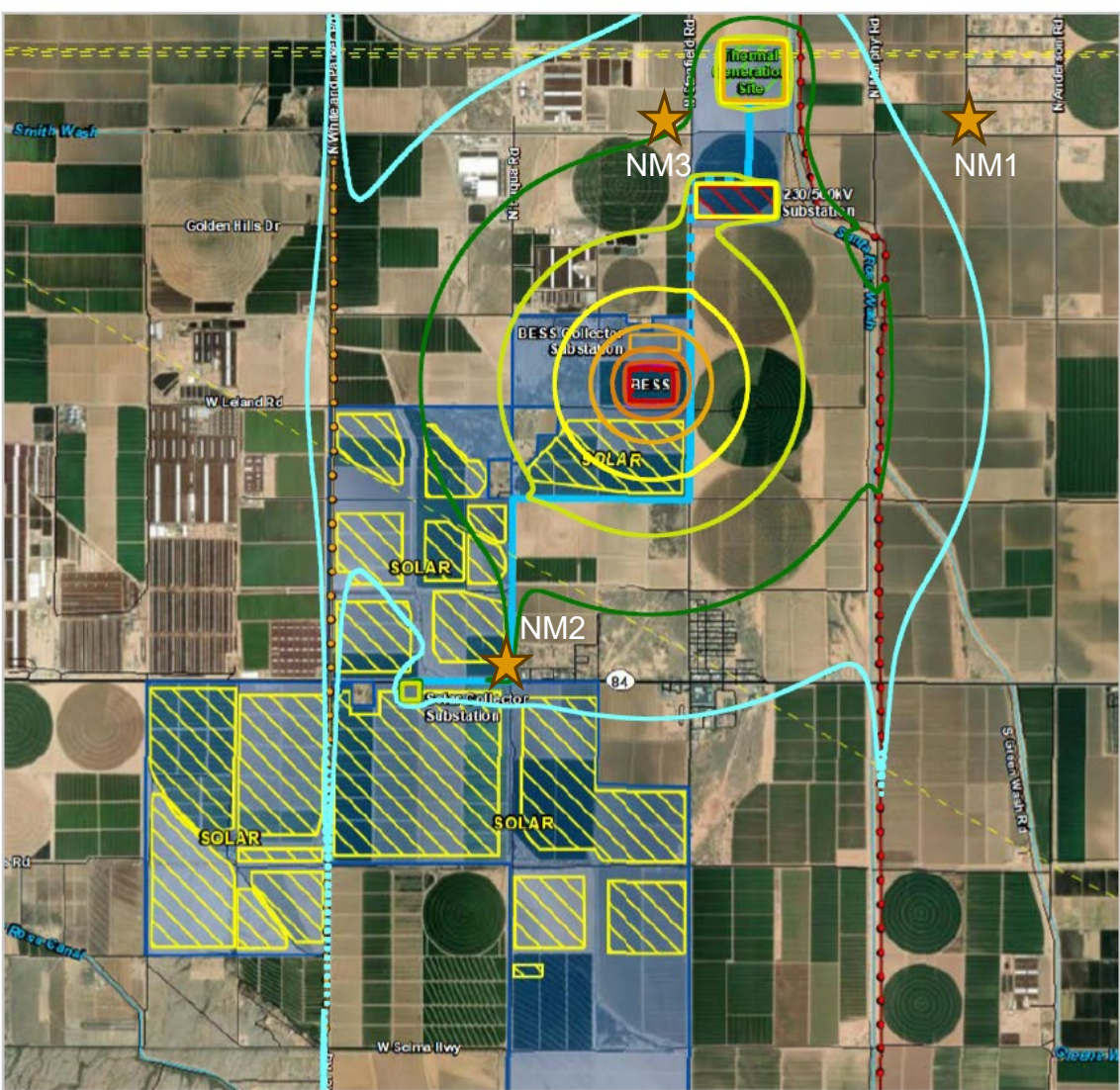


Project Rendering – Birdseye View



Noise Study

Noise Study Results



★ Ambient Noise model site

Source: Hearing Health Foundation

Noise Study Results

TABLE 3: MODELED EXTERIOR NOISE LEVELS FROM OPERATIONAL SOURCES

Monitoring Site	Time Period	Modeled Noise Levels (A)	Ambient Noise Levels (B)	Modeled plus Ambient (C) (A+B)	Potential Noise Increase Above Ambient (C-B)	Exceeds Pinal County Daytime Limit?	Exceeds Pinal County Nighttime Limit?
		dBA					
NM1	Daytime	30.5	62.7	62.7	0.0	No ¹	–
	Nighttime	30.5	59.8	59.8	0.0	–	No ¹
NM2	Daytime	33.8	59.8	59.8	0.0	No ²	–
	Nighttime	33.8	54.7	54.7	0.0	–	No ²
NM3	Daytime	35.1	51.4	51.5	+0.1	No ¹	–
	Nighttime	35.1	51.4	51.5	+0.1	–	No ¹

Note:

¹ Located within the Rural Zoning District, daytime (7am-9pm) limits is 65 dBA and nighttime (9pm-7am) limits is 60 dBA.

² Located within the Residential Zoning District, daytime (7am-8pm) is 60 dBA and nighttime (8pm-7am) limits is 55 dBA.

Source: Refer to **Appendix 2.0** for SoundPLAN Output Sheets.

Average listeners noticeably detect a difference of about **3 dB** in signal to noise ratio (SNR)

Source: Study published in PubMed

At nearest residences there is no discernable difference in noise

Siting, Engagement, Environmental and Regulatory Process

Statutory Requirements: Environmental

Air Quality

Biological Resources

Cultural and Historical Resources

Geology and Soils

Hydrology

Land Use

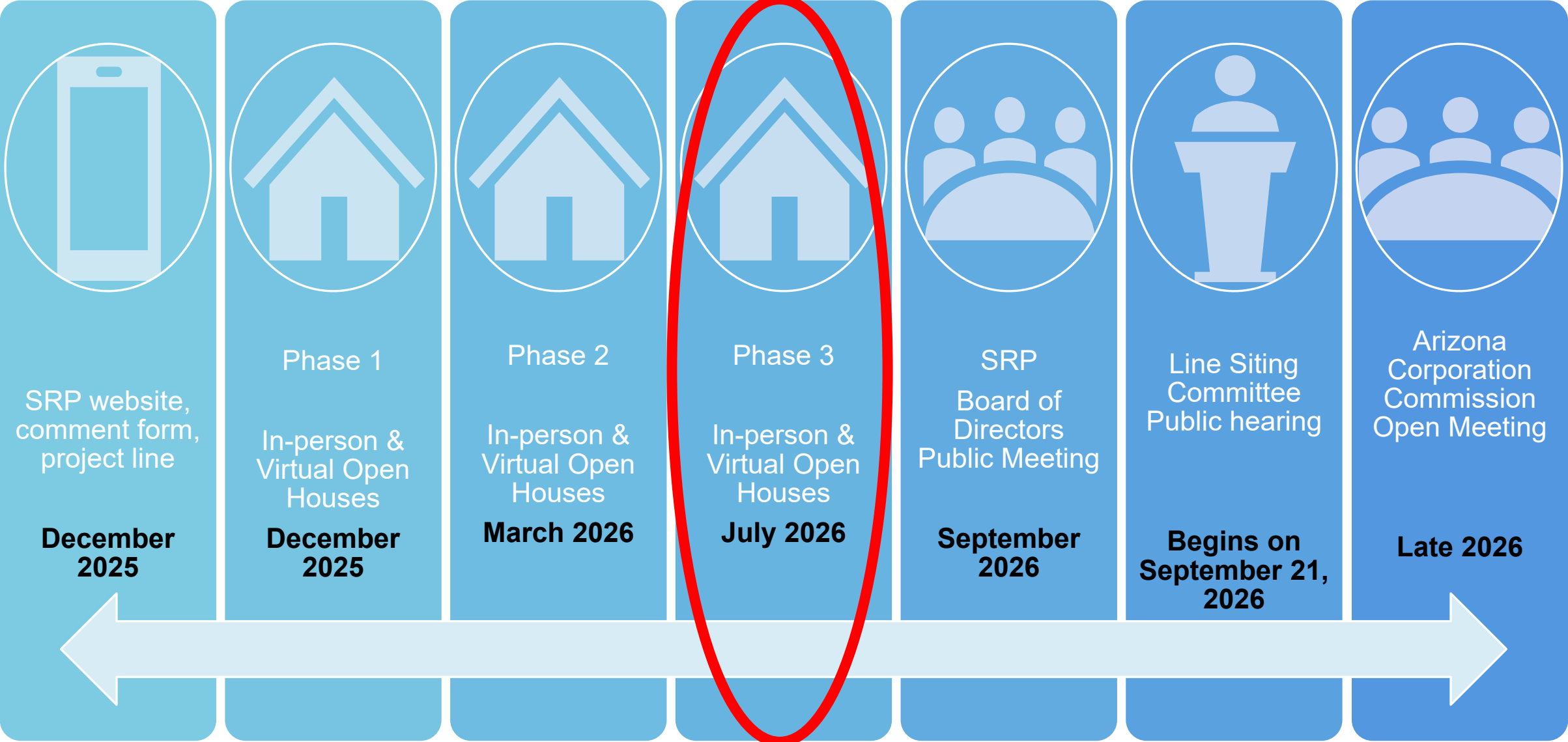
Noise

Recreation

Visual and Aesthetics



Opportunities for Public Input



Arizona Corporation Commission (ACC) Siting Process



File application
for a Certificate of
Environmental
Compatibility (CEC)

**Anticipated Mid
August 2026**



**Line Siting Committee
Public Hearing**
(30-60 days after filing CEC
application)

**Starts on September
21, 2026**

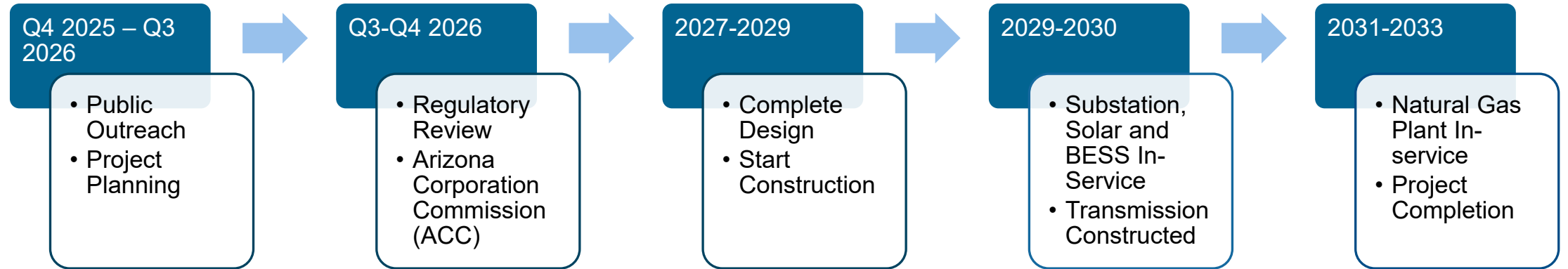


**ACC
Open Meeting**
(30-60 days after Siting
Committee Decision)

Q4 2026



Preliminary Schedule

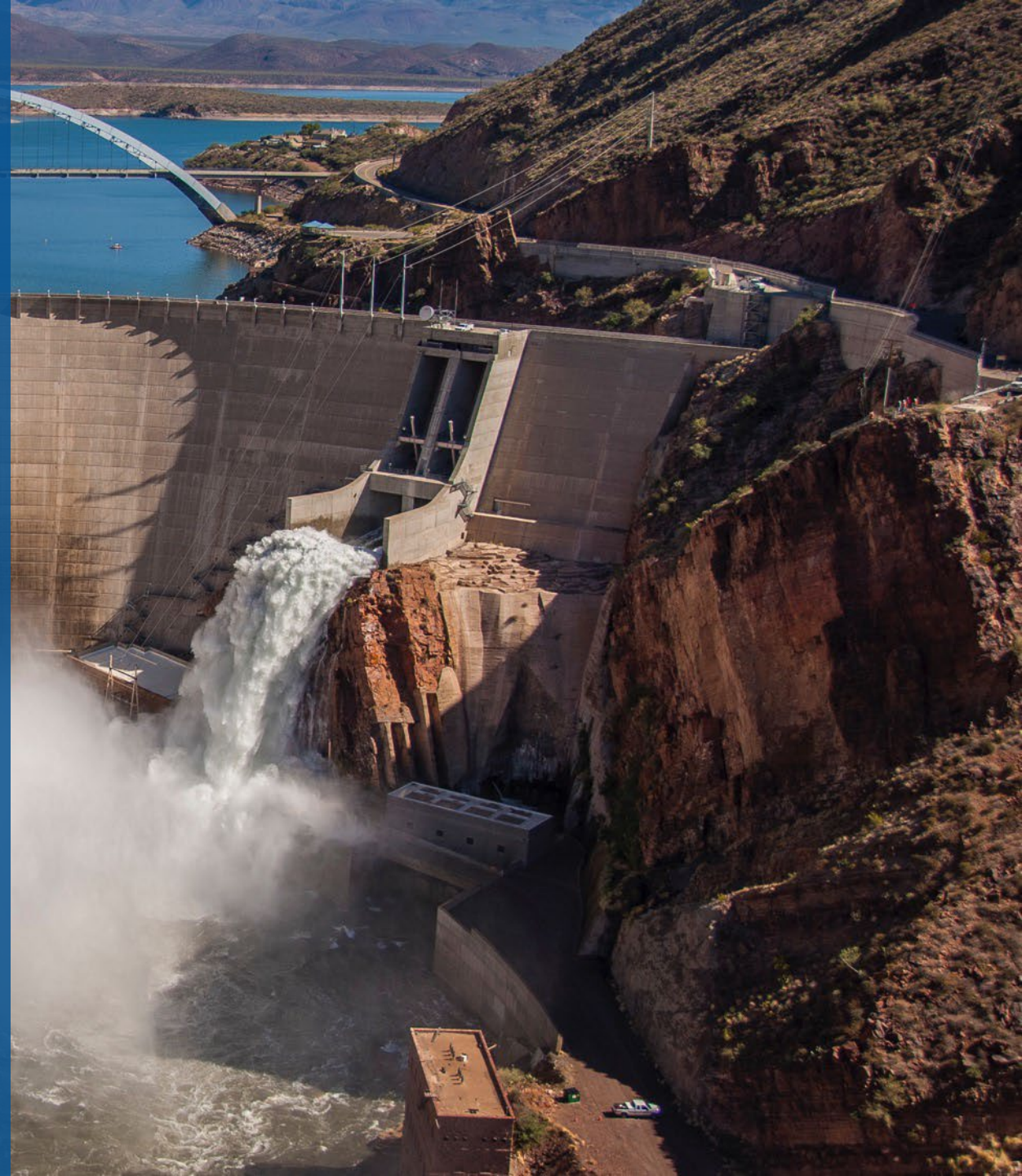


SRP

Water & Power

What is SRP?

- One of the nation's largest public not-for-profit power utilities
- Provider of reliable, affordable and sustainable water and power to more than **2 Million** people
- The largest raw-water supplier in the Valley, delivering approximately **800,000** acre-feet of water annually
- Responsible for management of a **13,000** square-mile watershed



Marigold Energy Center- Water Resources

Marigold is in the **Pinal Active Management Area (AMA)**, regulated by ADWR.

SRP's 2035 Sustainability Goal is to eliminate or offset groundwater use for power generation within an AMA. Marigold plans to incorporate **renewable water sources** as part of this commitment.

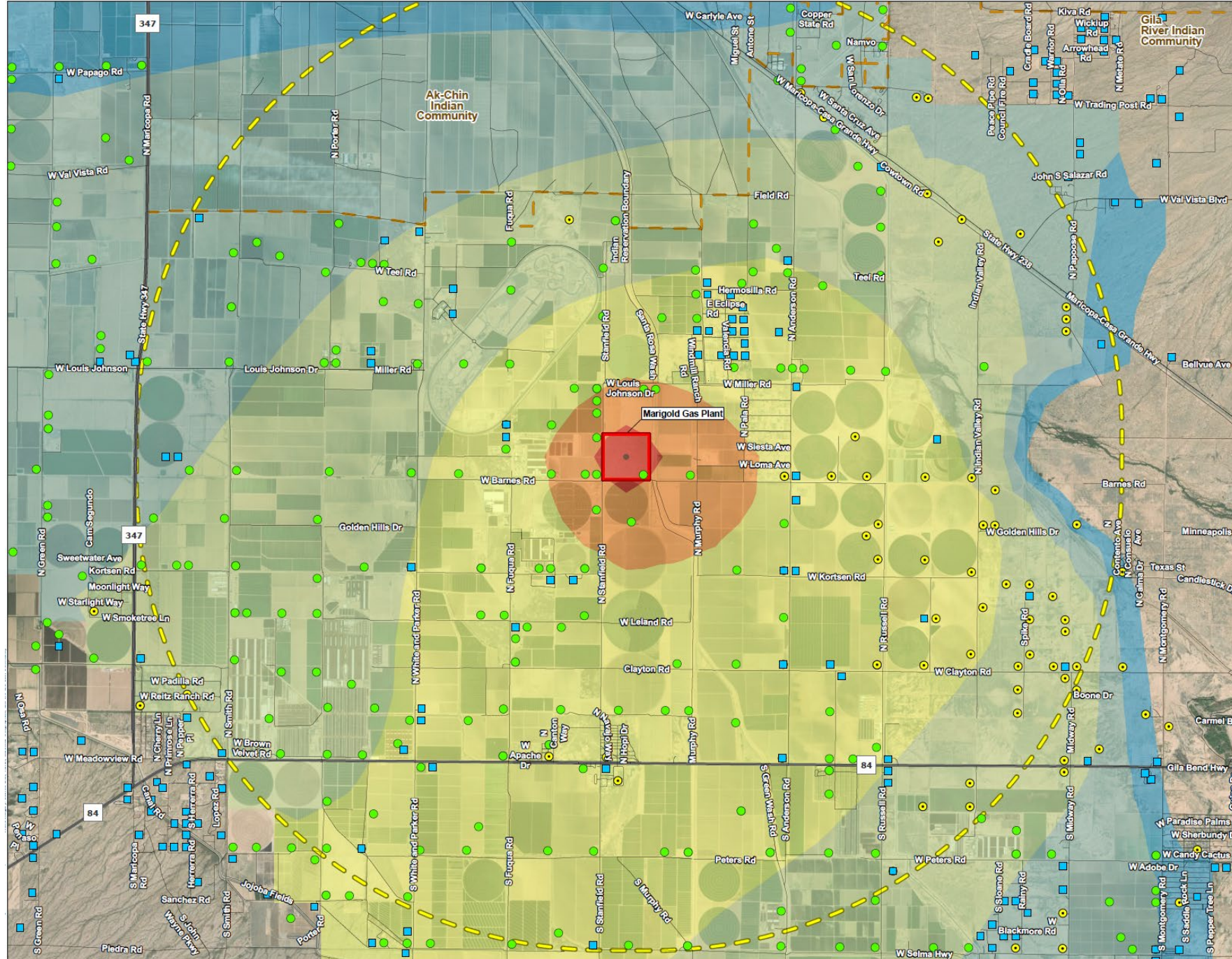
The Marigold site is historically agricultural; transitioning to solar, battery storage, and natural gas generation will significantly **reduce water use** compared to historical land uses.

SRP is committed to water stewardship. Developing a **sustainable, responsible water resource plan** will be a top priority throughout the project.

SRP has actively stored **Long-Term Storage Credits (LTSC)** within the **Maricopa Stanfield Irrigation and Drainage District's (MSIDD) Groundwater Saving Facility (GSF)**.

Marigold gas generation will **recover** these **LTSC** from wells within the **GSF**.





100-YEAR DRAWDOWN DIFFERENCE

EXPLANATION

- Exempt Well
- MSIDD Non-Exempt Well
- Other Non-Exempt Well
- Marigold Gas Plant

100-Year Drawdown Difference (feet)

- 1 - 1.25
- 1.25 - 1.5
- 1.5 - 1.75
- 1.75 - 2.0
- 2.0 - 2.25
- 2.25 - 2.5
- 2.5 - 2.75

DRAFT

1:28,000

0.5 0 0.5 1 Miles

SPHEROS
ENVIRONMENTAL

JULY 2026

Development Partner: NextEra Energy Resources

Who is NextEra Energy Resources?

NextEra Energy Resources (NEER) is a leading US Energy Developer...

- American owned and operated company with over 45,000 MW of total generating capacity
- The nation's largest developer and builder of energy infrastructure with a diverse portfolio of renewables, nuclear, natural gas, and battery energy storage systems
- Operating in 44 US States and Canada



... with substantial experience developing and operating projects in Arizona

Wind Energy Centers

3

Operational

Grid-Scale Solar

6

Operational

4

In Progress

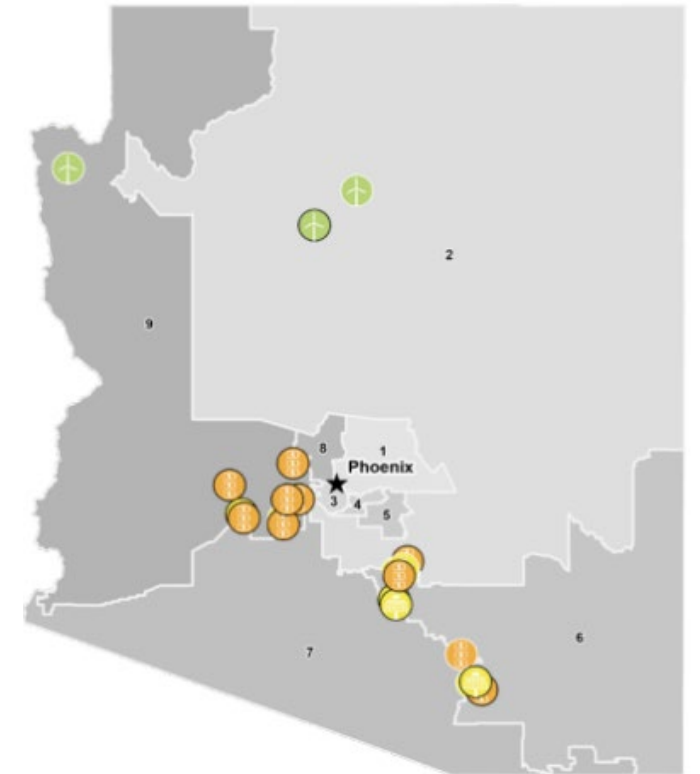
Battery Energy Storage Systems

8

Operational

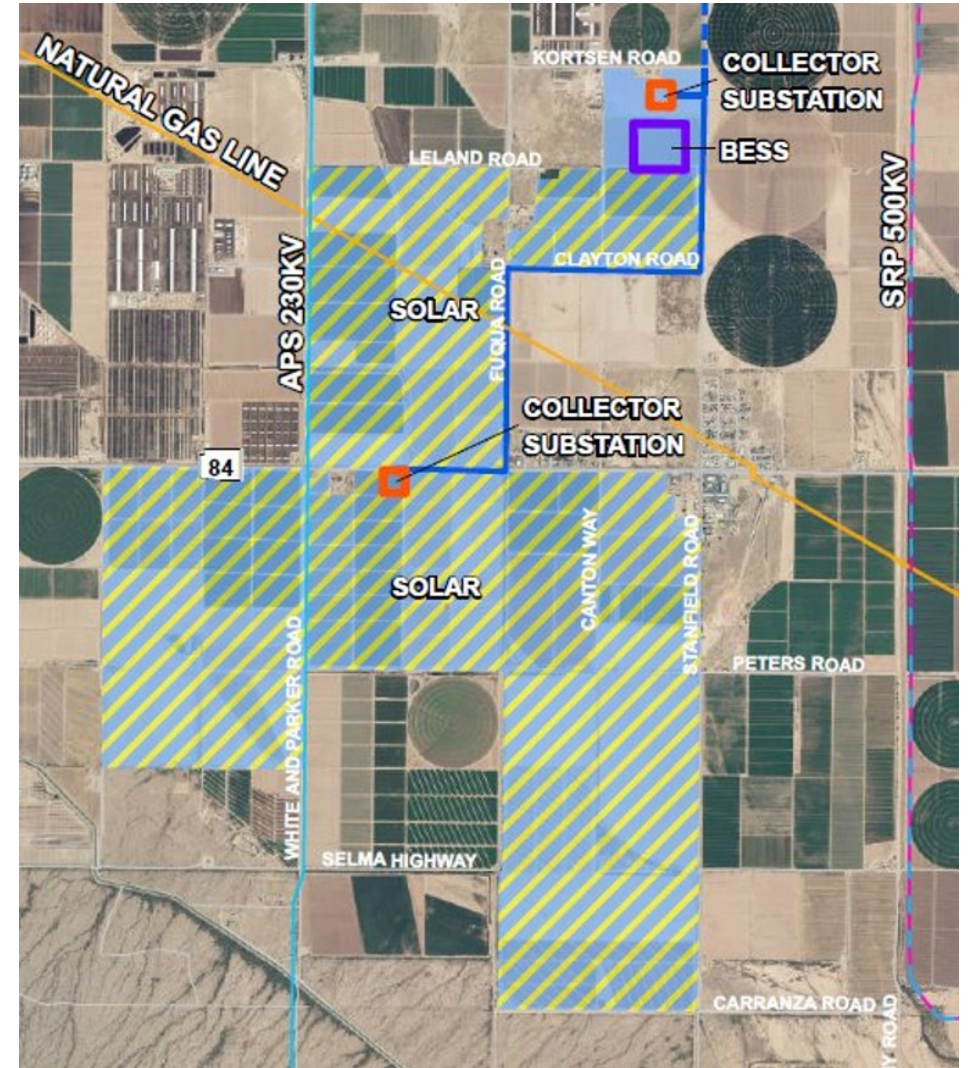
8

In Progress



What is NEER's involvement in the Marigold Project?

- NEER is leading the development of the solar and battery energy storage (BESS) components of the Marigold Energy Center
- Marigold is the first project developed jointly by NEER and SRP under their solar development agreement established in April 2026
- NEER and SRP are collaborating on community engagement efforts and launching programs to support the local community in Stanfield and beyond



Community Support

Stanfield Community Support

- Active member of the monthly Stanfield Breakfast with Business Leaders meetings.
- Recognized Stanfield Elementary School teachers and staff with employee appreciation gifts.
- Supported the Desert Senita Health Fairs.
- Engaged in the Stanfield Elementary School's events and initiatives.
- Working closely with the FBC Stanfield Food Pantry on their food distribution.
- Hosted an SRP Powering Our Future Workshop in April at Stanfield Elementary School for all teachers. Each participant received professional development hours and a grant for their classroom.

Proposed Community Benefits

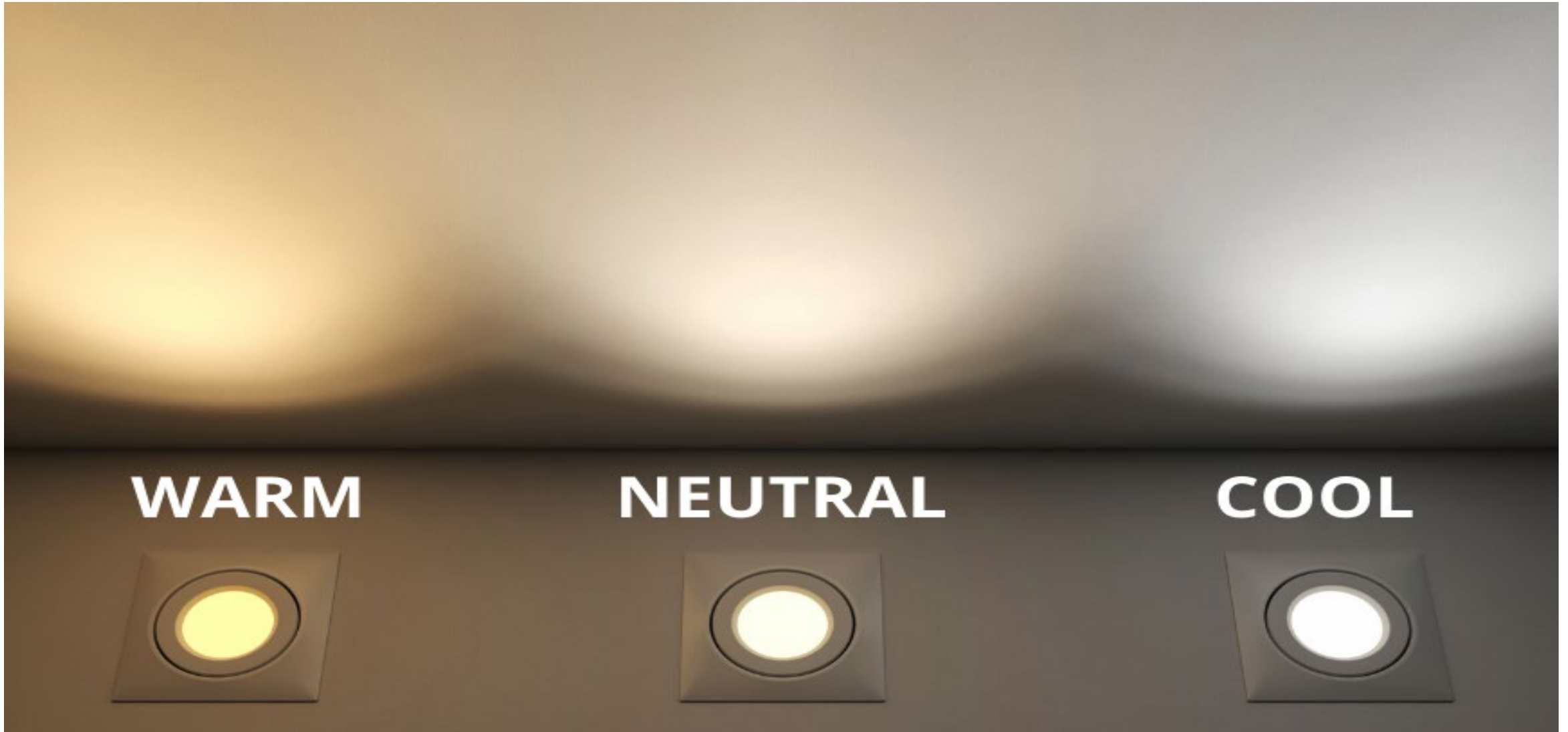
- Stanfield Elementary School Support
 - New school buses
 - Update playground equipment and shade structures
 - Repave parking lot and update exterior lighting
- Support Stanfield First Baptist Church Food Pantry
- Support Stanfield Fire Department
- Provide a Utility/Basic Needs Assistance Fund

Natural Gas Plant – Visual Mitigations Activity

<u>Vegetation Screening Options</u>	Trees	Shrubs	Both	No Vegetation
<u>Lighting Types</u>	Task Lighting	Directional / Cutoff / Shielded Fixtures	Low Intensity (Brightness levels)	No Preference
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Lighting Color Examples



Stack Color Examples



Matte Black



Matte Tan



Matte Brown

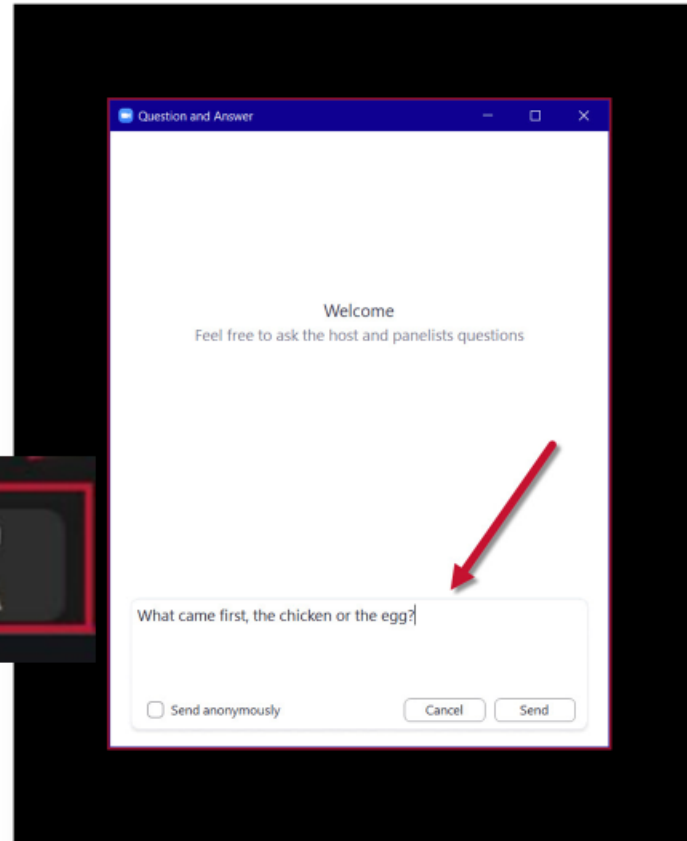
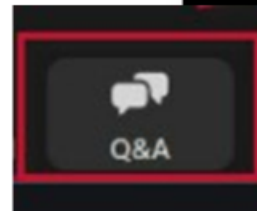


Matte Gray

We want to hear from you.

- Use the Q&A Feature to type in questions
- Ask questions throughout the presentation
- We will respond to as many questions as we can

*Click "Q&A" at
bottom of screen*



www.srp.net/marigold
1-602-236-2872

**We Want To Hear
From You!**

**Please Give Us Your
Feedback**

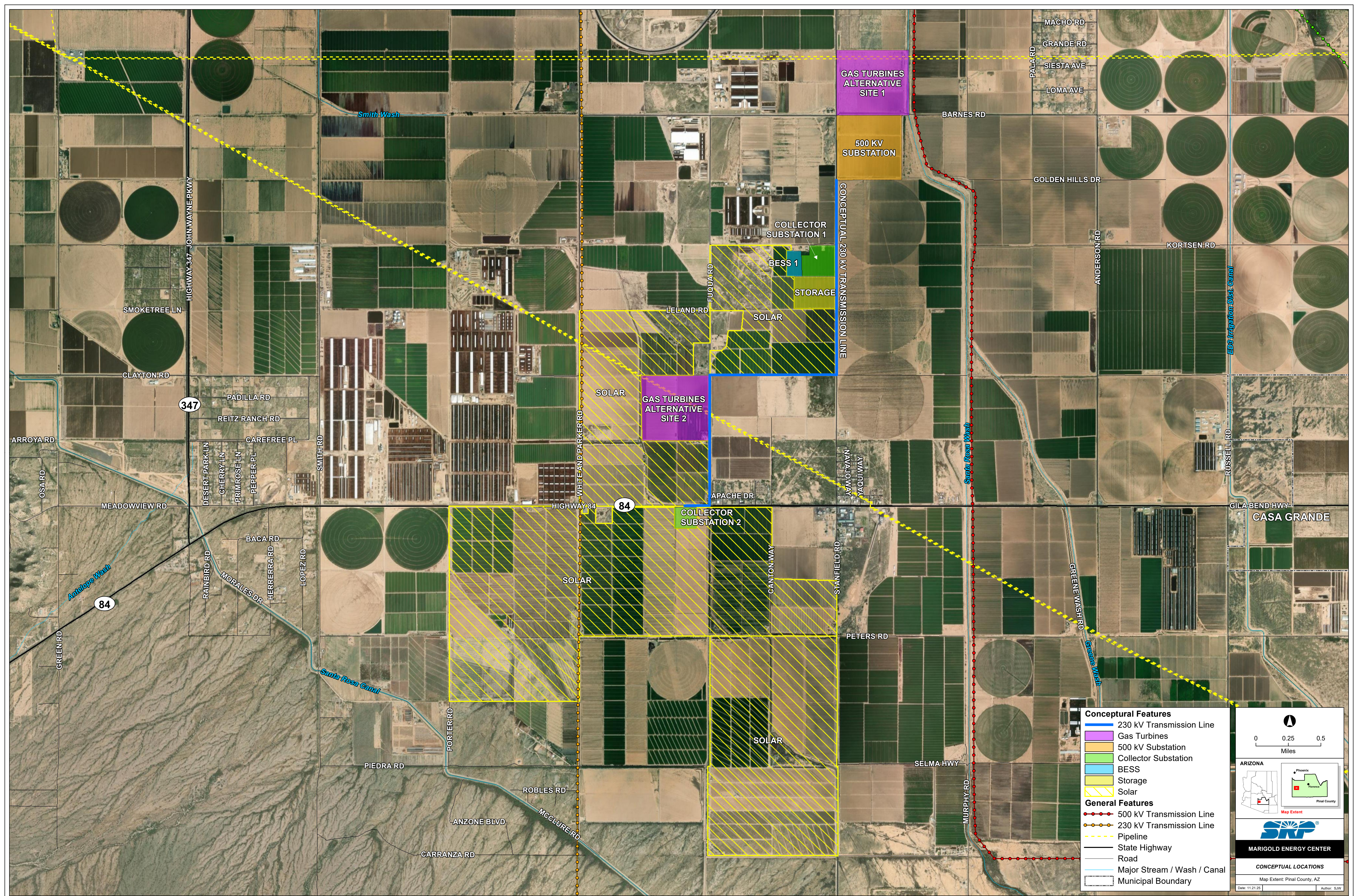
EXHIBIT J-4
TRANSMISSION SITING TABLE

Transmission Line Siting Criteria and Analysis

Segment/Route Alternative Analysis - Point to Point								
	Route 1	Route 2	Route 2 Extension	Route 3	Route 4	Route 5	Route 5 Extension	Route 6
Route Description								
Length (miles)	5.76	4.16	1.00	3.67	4.45	5.78	1.00	3.66
Existing transmission	2.48	0	0	0	0	3.00	0	0
Percentage following linear features	89.9	100	100	100	16.0	100	100	100
Percentage on SRP Controlled land	39.7	46.8	100	86.5	20.5	40.0	100	79.8
Length of additional connecting segments (miles)	1.8	0.9	0.9	0	0.75	1.8	1	0
Number of heavy angles	5	3	0	4	7	3	1	4
Dwellings (houses/occupied units)								
Within 500'	8	16	4	5	9	9	2	8
Within 1,000'	8	21	8	9	39	9	2	12
Within 1/2 mile	35	68	55	60	171	35	3	63
Within 1 mile	79	113	85	209	211	77	21	111
Structures (i.e. shed, garage, barn, not livable etc.) within 1 mile	332	198	58	242	247	334	204	181
Distance from Airport/Airfield (miles)	1.47	1.28	1.12	1.28	0.64	1.46	2.24	1.28
Dairy Farms within 1 mile	5	5	0	5	1	5	2	5
Other sensitive receptors (school, church)								
Within 1/2 mile	0	1	1	1	3	0	0	1
Within 1 mile	1	1	3	3	5	1	0	0
Distance from 500 kV line at closest point (ft)	3,180	3,180	10,690	3,690	1,170	3,180	15,955	3,690
Natural gas pipelines parallel (ft)	0	0	0	0	0	0	0	0
Natural gas pipeline crossings	1	1	0	1	1	1	0	1
Risks (qualitative)								
Environmental (H/M/L)	L	L	L	L	M	L	L	L
Cultural (H/M/L)	M	L	L	L	H	L	L	M
Constructability	L	H	H	H	L	M	M	M
Access	M	M	M	M	M	M	M	M
Grading/slope (%)	0.15	0.12	0.19	0.14	0.13	0.15	0.17	0.14
Required clearing	L	L	L	L	L	L	L	L
Land Use (adjacent uses)	L	L	L	M	M	L	L	M
Permitting	M	M	M	H	L	M	M	M

*Route 2 extension included if needed to connect an alternate collector station in western Project area

EXHIBIT J-4A
CONCEPTUAL LOCATIONS



Conceptual Features

- 230 kV Transmission Line
- Gas Turbines
- 500 kV Substation
- Collector Substation
- BESS
- Storage
- Solar

General Features

- 500 kV Transmission Line
- 230 kV Transmission Line
- Pipeline
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

0 0.25 0.5 Miles

ARIZONA

Phoenix

Map Extent

SRP

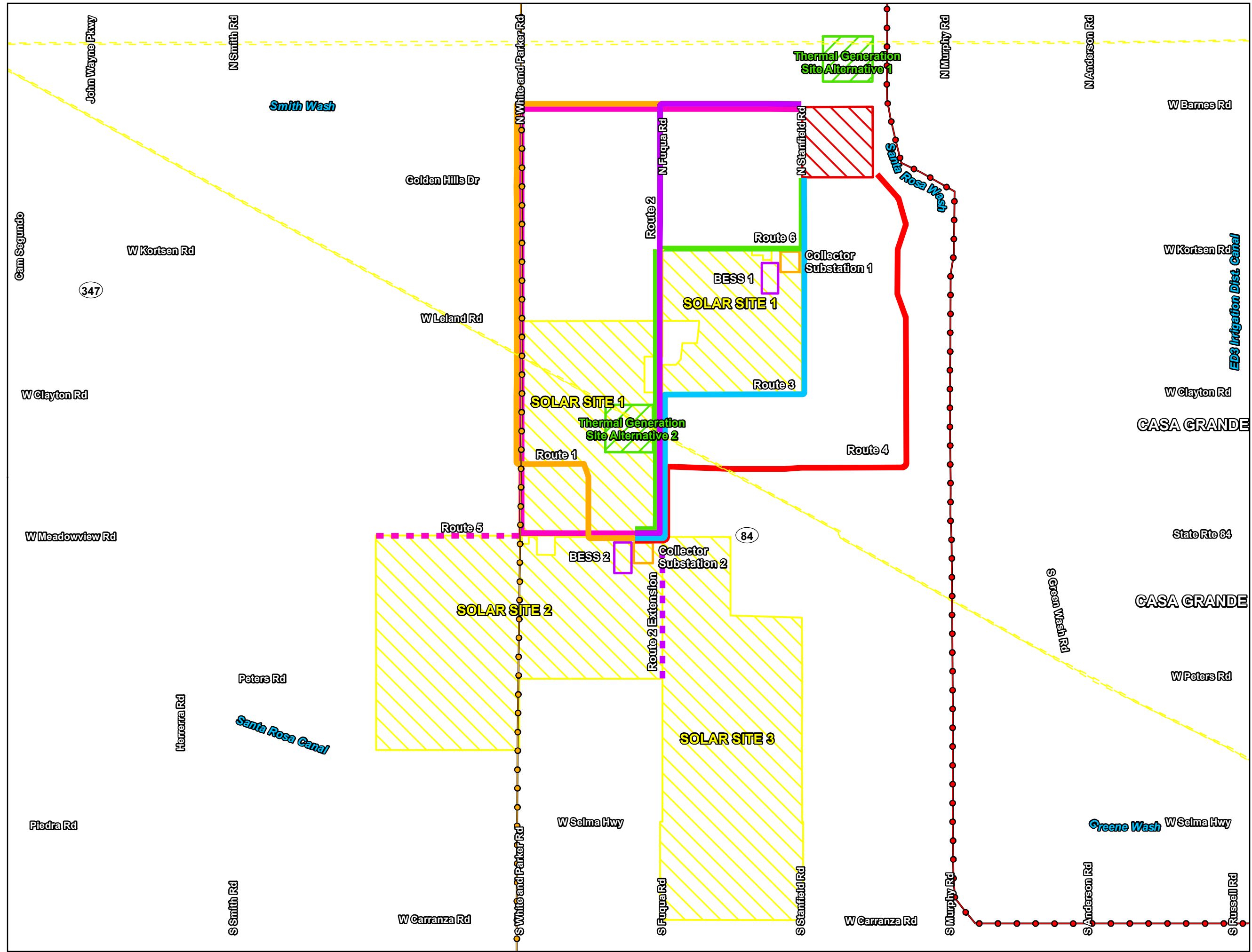
MARIGOLD ENERGY CENTER

CONCEPTUAL LOCATIONS

Map Extent: Pinal County, AZ

Date: 11/21/25 Author: SJW

EXHIBIT J-4B
POTENTIAL TRANSMISSION ROUTES



Legend

General Features

- Existing Substation
- 500 kV Transmission Line
- 230 kV Transmission Line
- Pipeline
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

SRP Marigold Potential Routes

- Route 1
- Route 2
- Route 3
- Route 4
- Route 5
- Route 6
- Route 2 Extension
- Route 5 Extension

SRP Marigold Energy Center

- Collector Substation Location
- BESS Location
- 230/500 kV Substation Location
- Thermal Generation Site Alternatives
- Solar Locations
- SRP-Controlled Property

0 0.25 0.5 0.75 1 Miles

ARIZONA

Phoenix Florence

Pinal County

Map Extent

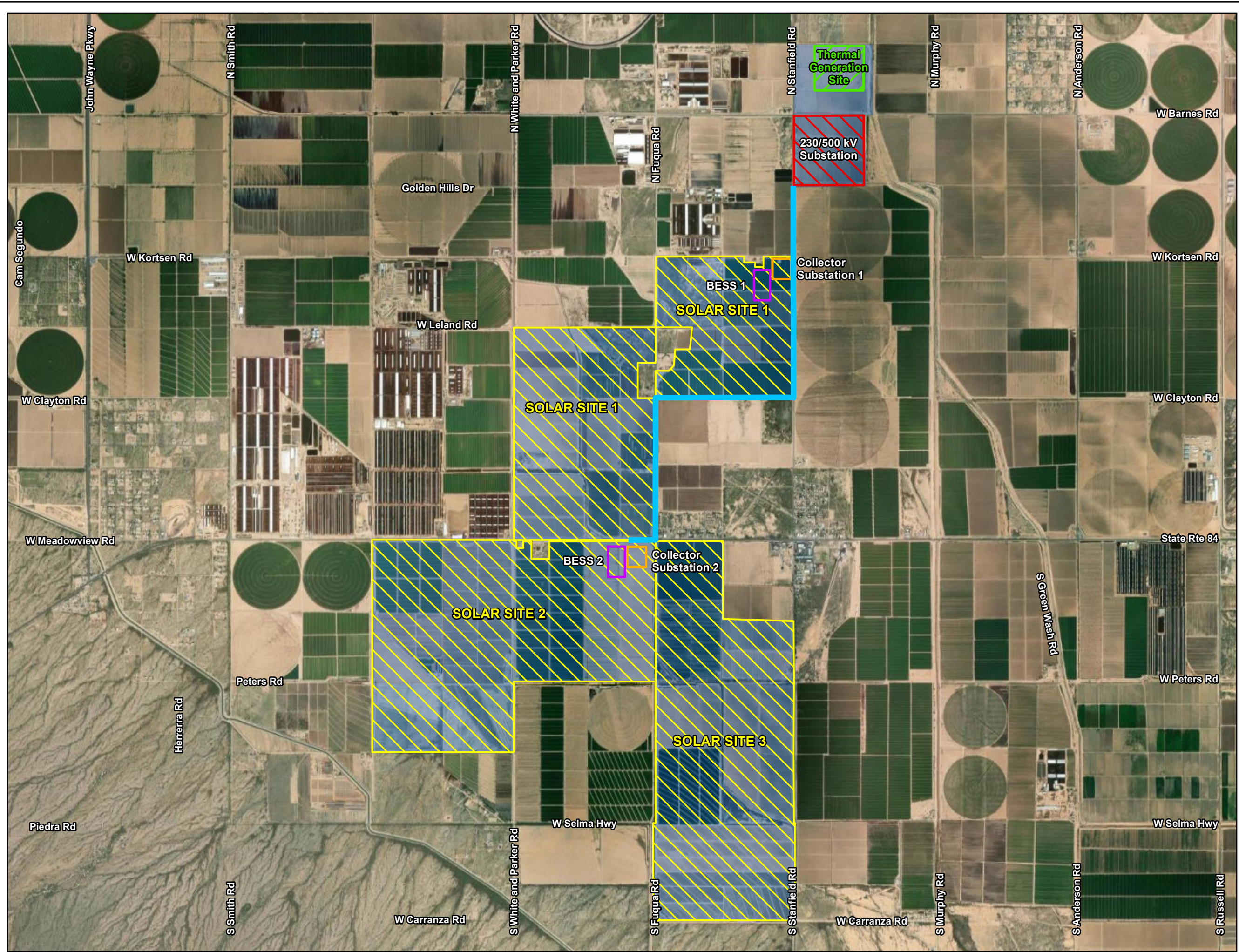
MARIGOLD ENERGY CENTER

POTENTIAL TRANSMISSION ROUTES

Map Extent: Pinal County, AZ

Date: 12.19.25	Author: SJW
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EXHIBIT J-4C
SITING STUDY RECOMMENDATION



Legend

General Features

- Existing Substation
- 500 kV Transmission Line
- 230 kV Transmission Line
- Pipeline
- State Highway
- Road
- Major Stream / Wash / Canal
- Municipal Boundary

SRP Marigold Energy Center

- Proposed Transmission Route
- Collector Substation Location
- BESS Location
- 230/500 kV Substation Location
- Thermal Generation Site
- Solar Locations
- SRP-Controlled Property

ARIZONA

Map Extent

MARIGOLD ENERGY CENTER

SITING STUDY RECOMMENDATION

Map Extent: Pinal County, AZ

Date: 12.19.25	Author: SJW
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