ORIGINAL

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BEFORE THE ARIZONA POWER PLANT
AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF CG APACHE COUNTY WIND AND CG APACHE COUNTY SOLAR LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE CONSTRUCTION OF THE LAVA RUN INTERCONNECTION PROJECT, A 345- KILOVOLT (KV) ALTERNATING CURRENT TIE TRANSMISSION LINE, WITH ASSOCIATED INTERCONNECTION FACILITIES, WITHIN APACHE COUNTY, ARIZONA.	)	DOCKET NO. L-21365A-25-0198-00250 LS CASE NO. 250 NOTICE OF FILING LIMITED APPEARANCE OF TOWN OF SPRINGERVILLE APACHE COUNTY, ARIZONA

Pursuant to ARS 40-360.05(B) and AACR 14-3-24(B), I, Ted Soltis, Interim Town Manager of the Town of Springerville, Arizona, hereby file this Notice of Limited Appearance in the above-captioned matter. Attached hereto as Exhibit A is a letter dated January 21, 2026, that was delivered to Adam Stafford, Chairman of the Arizona Power Plant and Transmission Line Siting Committee, and Briton Baxter, Director of the Utilities Division of the Arizona Corporation Commission.

RESPECTFULLY SUBMITTED this 22nd day of January 2026.

Ted Soltis, Interim Town Manager
TOWN OF SPRINGERVILLE
418 East Main Street
Springerville AZ 85938

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January 2026, I have served the foregoing documents on all parties of record in this proceeding, as listed below by mail and/or email, as shown for each party below.

Pursuant to AAC R14-3-204, the ORIGINAL and 3 copies of the foregoing were mailed to:
Utilities Division-Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix AZ 85007

COPY of the foregoing emailed this 22nd day of January 2026 to:
Adam Stafford
Assistant Attorney General
Chairman, AZ Power Plant & Transmission Line Siting Committee
2005 North Central Avenue
Phoenix AZ 85004
Adam.Stafford@azag.gov

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COPY of the foregoing mailed this 22nd day of January 2026 to:
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Brett Rigg
The Rigg Law Firm
377 East White Mountain Boulevard
Pinetop AZ 85935
Attorney for Town of Eagar

EXHIBIT A

Gateway to the White Mountains

Town of
SPRINGERVILLE
Arizona

Electronically transmitted to individuals and e-filed at https://efiling.azcc.gov/cases

January 22, 2026

Adam Stafford
Assistant Attorney General
Chairman, AZ Power Plant & Transmission Line Siting Committee
2005 North Central Avenue
Phoenix AZ 85004
Adam.Stafford@azag.gov

Briton Baxter
Director, Utilities Division
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RE: NOTICE OF LIMITED APPEARANCE
Docket No. L-21364A-25-0198-00250
Case No. 250

In the Matter of the Application of CG Apache County Wind LLC and CG Apache County Solar LLC, in conformance with the requirements of Arizona Revised Statutes §40-360, et. seq., for a Certificate of Environmental Compatibility authorizing the construction of the Lava Run Interconnection Project, a 345 kilovolt (KV) alternating current generation tie transmission line, with associated interconnection facilities, within Apache County, Arizona.

Dear Sirs:

Pursuant to ARS § 40-360.05(B) and AAC. R14-3-204, please accept this Notice of Limited Appearance on behalf of the Town of Springerville in Apache County in the above-captioned matter currently pending before the Arizona Power Plant and Transmission Line Siting Committee ("Siting Committee"). It is filed in response to the Order Remanding for Further Proceedings issued by the Arizona Corporation Commission on December 10, 2025, and subsequent Orders and Notices issued by the Chairman of the Power Plant and Transmission Line Siting Committee.

The Town of Springerville is the closest municipality to the Lava Run interconnection line and substations, as well as the wind project they will enable. An overwhelming majority of our citizens are opposed to the wind project. In May 2024, the Springerville Town Council voted unanimously to object to construction of the Lava Run Wind Project at its proposed location. Letters were sent to County, State and Federal officials, expressing the Town's objections.

A public comment in opposition to the interconnection line was filed to the Docket on October 18, 2025, expressing concern that it would cross open space that is important to the scenic and solitude values of our residents and visitors alike. We also expressed concern for the safety of pilots using the Springerville Municipal Airport because the wind project would be located directly in the flight path of planes arriving and departing our community.

This Limited Appearance is filed to reiterate in the strongest possible terms that our community does not support the interconnection project and the wind project it will ultimately enable. In addition to concerns related to the factors cited in ARS 40-360.06(A), Items 1, 4, 5 and 6, it will respond to Item 2 of the ACC Order Remanding for Further Proceedings, which states:

> *The Commission further finds and concludes that in balancing the broad public interest in this matter: . . . 2. Additional evidence about land use plans in the affected area of jurisdiction, and any other matter of public concern, is necessary in balancing the need for an adequate, economical and reliable supply of electric power against the impact on the area of jurisdiction.*

The adverse impacts of the interconnection and wind projects on our tourism economy, natural environment, and real property values are the primary concerns we will address in this Limited Appearance. In reviewing this statement and balancing the supply of electric power against the impact on our community, please keep in mind that our small community will not benefit much, if at all, from the power that will be transmitted across this interconnection line. Additionally, please consider the likely adverse impact of the interconnection and wind projects on our precious water supply.

1. TOURISM ECONOMY

Overview: Known as the "The Gateway to the White Mountains," Springerville's economy is dependent on year-round tourism. As headquarters of the 2.7 million acre Apache-Sitgreaves National Forest, Springerville serves as the base camp for visitors who come to our mountains for cool mountain temperatures, endless outdoor adventures and rich local history. We are a popular playground for urban Arizonans and out-of-state visitors who converge in our communities of Springerville and Eagar (aka Round Valley) for fishing, hiking, hunting, ATVing, jeeping, boating, kayaking, camping, backpacking, mountain biking, birdwatching, wildlife photography, stargazing, rockhounding, skiing, visiting museums and historic sites, antique shopping and other recreational activities that our community offers. (CEC Factors 2, 4, 5 and 6)

In the summer and fall, we offer a cool escape from the heat of southern and central Arizona. The fall and winter months draw hunters, especially to Hunting Unit 1, recognized as one of the premier hunting units in the Southwest. Others are drawn here to view migrating wildlife and the changing fall colors. The winter months draw skiers to the nearby Sunrise Park Ski Resort and others for cross-country skiing. All of these activities result in visitors patronizing the hotels, shops, restaurants, gas stations and grocery stores in our communities of Springerville and Eagar. (CEC Factors 2, 4, 5 and 6)

There is a very real fear within our business community that tourism will be harmed by the proposed interconnection line, and the wind project it will enable. According to a recent study, tourism revenues for Apache County were reported to be $149 million in 2022.[1] Aside from a handful of locations on the Navajo Reservation, the communities of Springerville and Eagar are the primary destinations and recipients of tourism dollars in Apache County. Several studies on the impact of wind farms on tourism suggest that visitors in search of recreational opportunities prefer untamed landscapes of high aesthetic quality. They feel that wind turbines negatively impact landscape appearance. When placed in unattractive landscapes, wind turbines are perceived as less problematic.[2] A literature review of tourism locations in the US and worldwide, conducted on behalf of Long Beach Island, New Jersey, found studies estimating tourism losses ranging from 11% to 50% due to proposed and/or existing wind turbines.[3] At the lowest end of this scale, a mere 10% loss in tourism revenue could devastate our tourism-dependent economy and possibly result in the shuttering of some businesses. (CEC Factors 2, 4, 5 and 6)

Springerville General Plan Goals, Objectives and Policies (CEC Factors 1, 2, 4 and 6): The importance of tourism to our community is cited throughout the Springerville Master Plan[4] and the Town of Springerville's General Plan (2015-2025).[5] Some notable stated objectives are:

- Sales tax revenue from visitor's expenditures is extremely cost-effective for the Town. (GP p.57)
- Springerville serves tourists and seasonal residents without incurring significant, additional administrative costs. (GP p.57)
- Expenditures to handle crowds at special events is well spent, as are advertising and promotional dollars to attract tourism. (GP p.57)

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[1] *Visitor Spending by County (2022)*, Arizona Travel Impacts, Dean Runyan Associates. Report prepared for the Arizona Office of Tourism.

[2] *Gone With the Wind? The Impact of Wind Turbines on Tourism Demand*, Tom Broekel & Christoph Alfken, Science Direct, Energy Policy. Vol. 86, 11/2015, pp. 506-519.

[3] *The Economic Impact of Proposed Wind Turbines on Long Beach Island, NJ's Tourism*, Iowa Climate Science Education Daily News, 5/8/24. *Potential Economic Losses of Reduce Tourism Attributable to Proposed Wind Turbines in Long Beach Island, NJ*, by Tourism Economics for PashmanStein WalderHayden. March 2024.

[4] Springerville Master Plan.
<https://www.springervilleaz.gov/media/Page%20Document/Economic%20Development/Springerville-Master-Plan-The-Tejido-Group-2007.pdf>

[5] Town of Springerville's General Plan (2015-2025).
,https://www.springervilleaz.gov/media/Page%20Document/Economic%20Development/General-Plan-2015-2025.pdf.

- Make the Town an end destination first on a state and regional level then on a national level. (GP p.57)
- The abundance of wildlife, forest, climate and recreation activities in Springerville's 'backyard' make it a perfect 'end' destination. (GP p.57)

The Environmental Planning Element of the General Plan emphasizes the important natural, scenic, historic and cultural aspects of our community that make it a sustainable tourism destination.

- Stewardship of assets such as native plants, wildlife habitats, scenic corridors, Casa Malpais and riparian areas set ground rules for human enjoyment of and respect for, fragile or sensitive resources. (GP p.56)
- The Town endeavors to work with the respective agencies to ensure that goals are met to protect our natural resources. (GP p.56)
- Goal: To protect and improve, where possible, environmental quality and natural resource values within the Springerville Planning Area. (GP p.60)

The Land Resource Element of the General Plan emphasizes the importance of natural resources to our economy, citing natural resource protection objectives as important General Plan elements.

- The Town's major assets are its location and the resource rich land that surrounds it.
- Preserving these resources is of the highest ranking for many community residents.
- Forested areas, wildlife habitats, wetlands, Little Colorado River and safe waste disposal are essential concerns in maintaining living quality in the Town.
- Working closely with neighbors who maintain forest assets helps to ensure the future quality of life for residents.
- Much of the Round Valley area is bordered by U.S. Forest Service and grazing lands that have benefited from years of careful stewardship.

Scenic/Visual Impacts (CEC Factors 2, 4, 5 and 6): The Lava Run Wind Project, including its transmission line and power poles will result in a significant visual intrusion to the vast grasslands they will cross. As a community that relies on our invaluable scenic, cultural and historic resources, we are committed to protecting the landscape views we value. The transmission lines being proposed, and ancillary substations, power poles, maintenance facilities, access roads and ground clearing necessary for these uses will create visual intrusions that will significantly alter the meaning of the landscape, distracting from what should be seen and felt. These proposed structures would not simply impact the scenic views but destroy the terrain itself.

Visual quality, natural beauty, feelings of freedom, peace, quiet, solitude and escape are some of the traits this area offers visitors. Juxtaposing the industrial-scale Lava Run facilities just outside the edge of town will diminish or destroy the very qualities many visitors seek. The primary approach to our community will be blighted with 41 wind turbines within 1.2 miles of both shoulders for a 10-mile stretch of Hwy 60, plus 71 more turbines as far as the eye can see in all

directions, and two large, fenced, industrial substations. The interconnection line will stretch for 27 miles on 200 power poles towering 180' above our open grasslands and volcanic field, crossing two key highways approaching our town. This will be the welcome that visitors seeking natural beauty, freedom, peace, quiet and solitude would receive as they approach our community if the interconnection and wind projects are allowed.

Many visitors to our communities enjoy the scenic drives through the mountains and forests of the White Mountains. Springerville is within several miles of four designated scenic routes. US 191 is a designated federal scenic byway that runs south from our town through Alpine to Clifton/Morenci. US 180, also a designated federal scenic byway follows US 191 to Alpine, then veers into New Mexico near Luna and continues south. Two state scenic highways, AZ 260 and AZ 261 offer our visitors majestic views through the Apache-Sitgreaves National Forest. AZ 261 climbs up into the Big Lake Recreation Area and at its summit, the Point of the Mountain Scenic Overlook, offers a panoramic view of the vast grasslands and cinder cones of the Springerville Volcanic Field. From this spot, which also overlooks our communities of Round Valley, nearly ALL wind turbines of the Lava Run project will be visible, in plain view during the day and as flashing red lights at night. Significant portions of the interconnection line would also be visible from this point.

At night, the flashing red lights on the turbines would be visible from many residential neighborhoods of Round Valley, including Cemetery Hill, Maricopa Road, 26 Bar subdivision, Elk Crest subdivision, and anyone driving from Greer or along AZ 260 into Round Valley. The Applicant's consultants failed to include any of these Key Observation Points in the CEC application, despite urgings from community members to do so during their various open houses.

Contrary to the testimony and analysis presented in the CEC Application, the interconnection project is NOT compatible with visual resources. Despite recognizing that the majority of KOPs would have "moderate to high" visual impact (KOPs 2, 3, 5 and 6), the Applicant's consultant testified that: *"The conclusion that we came to despite the moderate to high visual impacts, we have determined the project is compatible with visual resources, because there is no management plan that requires conformance with any visual resource management objectives, we were not in conflict with any visual resource management plan."* This is completely contrary to the many references in Springerville's Master Plan and General Plan that our surrounding natural resources are key to our tourism economy, as cited throughout this Limited Appearance. In fact, the Vision Statement in our General Plan specifically states:

> *The Town of Springerville is a community that values its pioneer, ranching, forestry and agricultural heritage, its rural and family oriented lifestyle, and a location that provides access to nearby natural and cultural resources. "Small town", family oriented values emphasize the strong sense of community that characterizes the Town as a valuable asset to the White Mountains region. (GP p.7)*

Geological Importance (CEC Factors 4, 5 and 6): The interconnection project and Lava Run Wind Project are almost entirely within the Springerville Volcanic Field (SVF) and we vehemently

object to the ground disturbances that these projects will cause. The SVF is a world renown geologic treasure, one of the youngest, most highly studied and comprehensively surveyed young volcanic fields in the United States. Surveys and mapping of the hundreds of cinder cones and basalt lava flows underlying the native soils were published in 1999 for the entire volcanic field by a team of geologists-volcanologists commissioned by the US Geological Survey, and reported to the AZ Geological Survey for its permanent files. Further research needs to be conducted in this volcanic field to answer scientific questions that surfaced from earlier findings. The blasting, drilling, heavy impact excavation, and/or other means of installing foundations for the interconnection line and wind project infrastructure would seriously and permanently degrade or destroy the lava flows of this area, irreparably damaging future research opportunities. The interconnection and wind projects will render the SVF of much lesser value for continued research that is still needed to answer some key questions about the Earth's volcanic processes, as well as the volcanology under study by NASA for other planets like Mars and Venus.

Numerous professional conferences and field trips about the unique volcanology of the SVF have been conducted in northern Arizona. Two recent conferences held locally, in 2020 and 2022, were attended by some 80 world renowned professional geologists and volcanologists from the US and many other countries attending. The 3-day discussion/lecture sessions were followed by 2-day field trips exploring and documenting the unique geology of this field. Natural history museum trips have also come to our community to explore the SVF, on bus tours of 35-40 participants. University field trips have brought students to study our local volcanology. Many of these trips involve overnight stays in our hotels and visits to our restaurants and shops. At least five new research projects were started in 2023-2025, with more planned.

The Springerville Heritage Center is our local tourism visitor center on Main Street which dedicates an entire display room featuring many interesting aspects of the SVF. Driving tour brochures are available for visitors to explore nearby stops in the SVF on their own. Several stops along the tour take visitors to where the interconnection line is proposed. Ending at the summit of Greens Peak (10,133'), the entire interconnection and wind projects will be in full view, severely altering the viewscape and attraction of the SVF and its many volcanic knolls.

Cultural/Archaeological (CEC Factors 4, 5, 6 and 8): The Springerville Volcanic Field was an important region for prehistoric Native American hunting and settlement for thousands of years. The varied landscape of the volcanic field, including high desert and forested areas, offered good hunting grounds. The volcanic geology provided ideal materials for making tools because the volcanic activity in the region produced high-quality, glassy stone, such as obsidian and chert, that was excellent for making stone tools. Prehistoric groups would have moved through the region seasonally, leaving behind artifacts associated with hunting and gathering. Numerous arrowheads and other stone artifacts have been found within and around the Springerville Volcanic Field. The prolonged history of settlement and hunting within the SVF increases the likelihood of finding more sites and artifacts. The Lava Run wind and interconnection projects would destroy the "integrity of setting" deemed critical in the preservation of historic and prehistoric archaeological sites, and in conveying information about the past. The CEC Application not only fails to address the important Category D aspects of this area, the

archeological surveys submitted are only 60% complete. Any newly discovered cultural sites would require mitigation strategies that will increase the cost of the interconnection line.

Springerville is also home to the Casa Malpais Archaeological Park located on the rim of a shield volcano within the Springerville Volcanic Field. The site, located just north of Hwy 60 on the edge of town, was declared a National Historic Landmark in 1964. The Town of Springerville purchased the site in 1991 after extensive negotiations and steps taken to ensure continued protection under the Arizona Antiquities Act. With funding from a State Historical Preservation Office grant, development of the site as a tourist attraction began, and it officially opened in 1993.

Casa Malpais is an ancient pueblo from the Mogollon Culture which was built and occupied between 1240 and 1350 AD. It is accessible only by guided tours from our local museum, the Springerville Heritage Center. This prehistoric site, a popular destination for visitors, features the ruins of a large Mogollon pueblo, Great Kiva, solar calendar, and ancient stairways built into a volcanic lava flow. The solar calendar, which remarkably precisely aligns with the summer and winter solstices, was relied upon for ceremonies, agriculture and time tracking. Tragically, if the projects are approved, viewers who are scanning the western horizon for the last moment of sunlight hitting the markers on this ancient calendar, will see industrial scale wind turbines and the massive interconnection line, entirely incompatible with the experience they came to enjoy. While the site is listed among the inventory of "Open Space Lands Open to the Public" identified in the Springerville General Plan, the Applicant's consultant failed to note this KOP for sensitive viewers in their analysis.

The Springerville Heritage Center, another important tourist attraction, is located in the heart of town on Main Street. This historic school building features artifacts, memorabilia and historical information about the communities of Round Valley as well as the Casa Malpais Archeological Museum, Renee Cushman Museum, Becker Family History Museum, White Mountain Historical Society Museum and an exhibit on the geology of the Springerville Volcanic Field. These extensive tributes to the history of our area are a source of community pride and attract many tourists.

Historic US Hwy 60 (CEC Factors 4, 5 and 6): Commissioned in 1926, US 60 was one of the early transcontinental highways from Virginia Beach to Los Angeles.[6] By 1935, US 60 navigated almost 400 miles across Arizona's midline and functioned as one of the state's most important east-west transportation routes.[7] It offers a rich historical map of westward expansion, connecting old trails, Native paths, pioneer routes, Dust Bowl migration routes and historic byways, particularly in the scenic West through areas like Arizona's high country. Today, it not only serves as a key artery for transport and trade, especially in rural areas, it combines history, culture and natural beauty, making it a representative example of American road development. According to the Arizona Department of Transportation, "US 60 is more than a highway. It is a 400-mile lesson in Arizona history and geography...a scenic route, with historic sections offering

[6] Although it once spanned the distance from the Atlantic to the Pacific oceans, it now terminates in western Arizona. Initially called the Transcontinental Highway, it combined segments of the Old Cumberland Pike, Old Trails Route (Boone Lick Road and Santa Fe Trail), and the Trail to Sunset.

[7] Arizona Memory Project, Arizona Historic Roads. https://azmemory.azlibrary.gov/nodes/view/96771

glimpses into America's travel past."[8] The current route of US Hwy 60 is a combination of segments of various historic roads and is now designated a National Memorial Highway. A significant historic section runs through the Town of Springerville. Industrial scale wind turbines, power poles and transmission lines would disrupt the essence of this historic highway.

Due to the highway's historic importance, Springerville is home to one of 12 historic "Madonna of the Trail" monuments in the United States. Dedicated on September 29, 1928, this monument symbolizes the spirit, strength and courage of America's pioneer women who traveled westward. The 12 identical monuments depict a frontier mother carrying her baby with a young son clinging to her skirt. The Springerville location marks a key point where the National Old Trails Road meets the Coronado Trail. This nationwide project by the Daughters of the American Revolution (DAR) grew from their early efforts to locate and honor the Santa Fe Trail. Maintaining historic sites is a key aspect of the DAR mission and "Springerville's monument has been painstakingly preserved through several rededications in 1988, 1998, 2006 and 2017. In 2023, its 95th anniversary, a local wreath-laying ceremony was held at the gravesite of Eliza Catherine Manna Rudd, the woman who unveiled the monument in 1928.[9]

The beauty of this historic segment of US Hwy 60 is a source of community pride. The Springerville Master Plan makes note of the grasslands surrounding Springerville as an important natural feature. "The open space encountered in traveling US 60 lends a pastoral feeling to the town and enhances its frontier image. The quantity of open space on the approach to Springerville is a striking experience, and the presence of open space and views into pasture lands is unique." (MP p.25)

Other Recreational Impacts (CEC Factors 2 and 4): Our tourism economy is also linked to the Springerville Municipal Airport. Private pilots regularly choose it as a destination to stay for an extended visit, while others use it overnight or as a temporary stop-over for a meal break and refueling. Seasonal residents with second homes in our communities sometimes fly into our airport for their long term visits, renting hangar, tarmac and parking spaces to store their planes and vehicles.

- Aviation Expo and Fly-In: The Round Valley Animal Rescue Aviation Expo and Fly-In is an annual event that draws pilots and other visitors to our community. The primary fundraiser for our local animal shelter, the expo is held at the Springerville Municipal Airport and features skydiving demonstrations, vintage WWII aircraft, experimental planes, hot air balloons and opportunities for the public to ride in vintage planes. The event is held in early June when wind speeds can be high. The majority of participants come in small planes, and mostly from the west using Hwy 60 for visual approach. Often, they are flying planes with limited performance capabilities and some of these visiting pilots may not be familiar with our high density altitude, downdraft and turbulence challenges. Compounding these challenges with a 180' tall power line and wind turbines and the resulting narrowing of the Hwy 60 approach path, the likelihood of a serious

[8] https://azdot.gov/adot-blog/road-trip-arizonas-piece-us-60-original-transcontinental-highway#:~:text=In%20its%20heyday%20before%20the%20construction%20of,10%2C%20about%2030%20miles%20east%20of%20California.

[9] *DAR to Honor Historic Madonna of the Trail Statue*, by Toni Gibbons, White Mountain Independent, 11/28/25.

aviation incident is a real and grave concern (see Aviation Safety discussion below). It is feared that the wind and interconnection projects may negatively affect the future of this very successful annual event, now approaching its thirteenth year.

- Glider (aka Sailplane) Flight Opportunities: For a number of years, our airport was frequented by sailplane enthusiasts who spent several days during the summer months, taking advantage of the thermal lift from our mountain terrain. Pilots would fly cross country in their gliders, from the Albuquerque, Tucson and Phoenix areas, to enjoy our ideal gliding climate and terrain. Some offered tandem flight experiences, and all welcomed the community to learn about gliding. This is a tourism opportunity that our Town does not want to foreclose, and with the interconnection and wind projects so close by, it is feared that this may be the result.

- Wildlife – Viewing, Hunting and Respecting: Wildlife is another critical aspect to the success of our tourism economy. Several General Plan elements emphasize the value that our residents place on it.

  - Habitat sensitivity is closely related to forest preservation, especially because of its importance to local residents and agencies such as the Forest Service and the Arizona Department of Game and Fish. (GP p.60)
  - Consideration is focused on wildlife migration corridors to facilitate animal movements free from human confrontations. (GP p.60)
  - Open space pockets are another concern of wildlife interaction with manmade elements which exists along major roadways (Highway 60) where accidents can occur due to crossings by large animals. Signage indicating such hazards should be maintained. (GP p.60)

The White Mountains of Arizona are a prime hunting location in the southwest, and home to a multimillion-dollar industry. When hunting season begins, our airport is a landing destination for hunters who fly in to hunt for trophy elk and deer. Many are customers of local outfitters who provide them with guide services. The significant revenue they bring into the area will likely be jeopardized as their pilots grow concerned with the safety hazards created by a large field of wind turbines and associated infrastructure so close to this airport (see Aviation Safety discussion below).

- Birding: The towns of Springerville and Eagar are a key birdwatching area in Arizona, situated within the Upper Little Colorado River Watershed Important Bird Area (IBA). IBAs are sites determined by the Audubon Society to be vital for bird conservation. They are designated by using standardized criteria focusing on significant populations of vulnerable species, rare/restricted-range species, biome-restricted species, and large congregations of birds (breeding, migrating, wintering). A site qualifies if it meets thresholds for these "trigger" species, indicating essential habitat for global biodiversity conservation, supported by data-driven assessments.[10]

[10] National Audubon Society. < https://www.audubon.org/>

The Upper Little Colorado River Watershed IBA encompasses approximately 27 miles of the Little Colorado River from its headwaters on Mount Baldy flowing northeast to Winema Wildlife Area, through the towns of Springerville and Eagar. The IBA encompasses some adjoining uplands where known Mexican Spotted Owl and Northern Goshawk territories exist. Several lakes/reservoirs are included in the watershed and are within the IBA, including Lee Valley Reservoir, White Mountain Reservoir, River Reservoir, Tunnel Reservoir, Bunch Reservoir, and Becker Lake in Springerville. Becker Lake and more than 680 miles of clear streams also offer world-class trout fishing opportunities for our visitors.

2. AVIATION SAFETY (CEC Factors 3, 4 and 6)

The Springerville General Plan stresses the need to "encourage activities that will not impede the long-term viability of the airport" as a means of enhancing opportunities for economic development. It also cites the need to create and capitalize on opportunities afforded to Springerville's airport in order to increase employment and sales tax generating activities. (GP p.20) It cautions against "incompatible land use at or near airports (which) may result in the creation of hazards to air navigation and reductions in airport utility resulting from obstructions to flight paths," concluding that "incompatible land uses around an airport can affect the safe and efficient operation of an aircraft. (GP p.25)

The Springerville Municipal Airport is owned and operated by the Town of Springerville. A new terminal and municipal hangar were constructed in 2013, offering conference and meeting rooms and office space, flight planning and pilot lounge facilities. There are currently two runways: the main runway of 8,422 feet and the crosswind runway of 6,403 feet, each with parallel taxiways. The parking apron accommodates 46 tie-down spaces and 3 helipads. Privately developed hangars are available on the south side of the airport, with land available for further hangar development. Automated weather observations, Jet A and AvGas are available 24 hours a day. The airport currently sees approximately 3,000 aircraft operations annually, with over 10% of those being medevac flights, and nearly 50% being related to business in the Springerville area. There are 17 aircraft based at the airport. Future plans include additional taxiways, state-of-the-art fueling facilities, additional hangars, a dedicated helicopter operations area and expanded apron facilities. (GP p.44)

In January 2023, the FAA issued a Determination of No Hazard to Aviation for the Lava Run Wind Project with no official public input from the Town of Springerville or pilots using Springerville Municipal Airport. Since becoming aware of this Determination, the Town has attempted to reverse the decision with no success. The Determination will expire on February 1, 2026, at which time the Town and local pilots intend to oppose any renewal effort by the Applicant.

Despite the finding of "no hazard," several conclusions in the Determination support local concerns outlined in the discussion below. "At a height greater than 499 feet AGL (above ground level), the proposed wind farm would extend into airspace normally used for VFR (Visual Flight Rules) enroute flight." It also notes that "turbines within 2 statute miles of a VFR route would have an adverse effect upon VFR air navigation." The most recent Repsol maps show at least 60 turbines planned within two miles of US Hwy 60, which is often used for visual approach. Most

pilots using Springerville Municipal Airport are not certified to fly using instruments (IFR-Instrument Flight Rules). Hence protecting VFR and other visual approach routes is critical to pilot safety.

High Density Altitude. This is one of our gravest concerns. Springerville operates the highest-elevation municipal airport in Arizona. While most of our local pilots are experienced and familiar with the challenges of high density altitude, visitors to our area sometimes are not. Recent plane crashes highlight the limitations of planes attempting to take off in high density altitude[11]. Many of our local pilots have observed incidents of planes flying just above ground level as pilots attempt to gain altitude under the challenges of high density altitude. Planes departing to the north and west have been observed flying in ground effect well beyond Hwy 60, directly into the path of the proposed wind farm, interconnection poles and transmission lines. All of these proposed structures would be situated within the airspace needed for gaining altitude. On hot, humid days, the density altitude can approach the service ceiling of light aircraft, making the climb to altitude a long, laborious process, and likely a dangerous process with wind turbines and other proposed infrastructure in near proximity.

Unpredictable Downdrafts and Turbulence. The prevailing winds at the airport come from the southwest where there is a mountain range. This combination of wind and high terrain makes landings and departures from our airport especially challenging during non-optimal weather conditions. Wind is a significant factor, especially in the Spring, when high wind speeds and gusts prevail on a typical day; gusts in excess of 60 mph are not uncommon. Approaching the airport from the southwest in windy conditions creates a challenge due to the abbreviated distance between the mountains and the airport. A gradual descent is difficult, making an approach from the north a preferable alternative. The northern approach, however, is similarly challenging due to occasional downdrafts caused by winds heading northeast flowing over the tops and down the mountainside, causing a downdraft and rolling motion. These unpredictable downdrafts could potentially pull planes into the direction of the proposed interconnection and wind projects, thus creating a safety hazard for aircraft, especially those with limited performance capabilities. The extremes in ground and air temperature common to our mountainous terrain also contribute significantly to turbulence.

Because the prevailing winds are from the southwest, the majority of flights take off in that direction. This is also the direction that pilots going to Phoenix and Tucson need to head. However, the closeness of the mountain range leads many pilots to fly first to the north, then west, before turning southwest. This northwesterly heading leads directly into the proposed interconnection and wind projects where unpredictable downdrafts and turbulence can be a hazard. The rising elevation to the west is already challenging for take-off, and 654' tall wind turbines in close proximity will compound the challenges of the ascent.

A 2014 study by the University of Kansas School of Engineering found that:

[11] See NTSB Aviation Investigation Final Reports WPR10FA287 (2010) and SEA08FA187 (2008).

"...impacts of wind turbines on aviation include physical penetration of airspace, communication systems interferences and rotor blade-induced turbulence."

"The wind turbine wake increases the crosswind component to more than 12 mph which is considered high risk crosswind for small general aviation aircraft."[12]

In laymen's terms, one of the researchers explained that "turbines can set up a circular vortex that can roll a plane if it gets in there" and "they can increase crosswind speeds above what's expected, which can be a real danger to small aircraft, which don't typically take off and land with crosswinds stronger than about 12 miles per hour."[13]

While the local pilots using Springerville Municipal Airport recognize these potential hazards, the unfortunate aviation accidents and deaths recently experienced in our community have raised awareness of these challenges to a much higher level.

U.S. Hwy 60 and AZ Hwy 180/191 Used for Visual Approach. Much of the air traffic approaching Springerville Municipal Airport comes from the west, where Phoenix and Tucson are located. The Hwy 60 corridor is the preferred and safest arrival and departure route because of its slightly lower elevation. To route around the higher terrain to the southwest, most planes, and especially low performance aircraft and pilots who are not IFR-rated, use Hwy 60 as a visual reference to the ground. Because the cinder cone hills of the Springerville Volcanic Field dot the terrain to the north, east and west, following the highway surface is the best and safest approach route. The existence of wind turbines along both sides of Hwy 60 for a 10-mile stretch approaching the airport, as well as a 6-mile segment of the proposed 27-mile interconnection line which also crosses Hwy 60, will create a safety hazard for pilots using this highway as a reference point.

In inclement weather, when the cloud cover prevents approaching the airport at higher altitudes, nearly all pilots use Hwy 60 from the west or AZ Hwy 180/191 from the north as a visual reference to the ground. In fact, during winter whiteout conditions and severe rainstorms, which are unpredictable but common during the monsoon season, Hwy 60 is the only clear visual reference for approaching Springerville Municipal Airport from the west. The height and light color of turbines also will add to the safety hazard for pilots, not only during inclement weather conditions but under normal weather conditions as well. The fact that the turbines' blade tips extend well beyond their beacon lights only compounds these concerns.

There is currently a 60' tall power distribution line that runs parallel to Hwy 60 on the south, located within the boundaries of the wind project. The interconnection project will result in the installation of a 180' tall high voltage power transmission line running parallel to Hwy 60 for 6 miles on the north side of the highway. This transmission line is certain to increase the safety

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[12] *Wind Farm Turbulence Impacts on General Aviation Airports in Kansas*, Thomas E. Mulinazzi, Ph.D., P.E., L.S., Zhongquan Charlie Zheng, Ph.D.; University of Kansas; January 2014; p. 31.

[13] Howard, Cody; *Study finds small aircraft face risks at airports near wind farms*; KU News (University of Kansas); 1/15/14.

hazard to pilots using Hwy 60 from the west, especially in inclement weather, because the wind turbines will significantly narrow their approach corridor.

Standard Visual Approaches from the Northwest. For both safety reasons and noise abatement, the traffic pattern for landing on RWY 21 is a right-hand approach. This approach is a deliberate attempt to keep air traffic from flying over and disturbing the residents of our community. RWY 21 is the most frequently used runway for landing due to the prevailing winds. It is an approach from the north of town. The interconnection and wind projects will be directly under this predominant approach route, creating a safety hazard for pilots as they begin their descent into our airport. A medical professional who regularly flies in from Flagstaff to treat patients has expressed his concerns to the FAA, stating that he will no longer be willing to come here if the wind project is built in its proposed location.

Flight Instruction. Although flight training is not currently offered at Springerville Municipal Airport, there have been periods in the past when both ground school and in-flight instruction have been offered. Resuming training opportunities is clearly an option that the Town desires to keep available should a qualified flight school or instructor emerge in the future. However, both the interconnection and wind projects are likely to diminish or preclude such an opportunity due to their location to the northwest of our airport, likely to be training ground.

One of our current Council members recalls his experiences during his time as an active pilot:

> *"During my flying days, flight instruction took place west and north of the airport, where the wind farm is proposed. Practicing stalls, flying under a hood and recovering from unusual attitudes many times took the plane below 500 feet AGL."*
>
> *"A part of my VFR training included coordinated turns and navigation that prepared me to circumnavigate thunderstorms. This skill many times required flying at or below 500 feet AGL. This vector, time and airspeed skill was practiced regularly (at least monthly) to maintain proficiency, and I had to apply it on several occasions when flying cross-country."*[14]

Federally Strategic Airport. Springerville Municipal Airport has significant strategic value in the event of a national emergency. Its RWY 03/21 is 8,422' long, 75' wide, and surfaced to receive jet traffic. It is used by various emergency aircraft, including fixed wing and helicopters, such as F-15s, DC10s, Hueys and C-130s on military maneuvers. Two large fuels tanks, supplying 100LL fuel and Jet A fuel, contribute to the strategic value of this airport. The airport is also a strategic center for wildland firefighting in this region of forests, woodlands and grasslands. The airport serves as a Helitack base for the US Forest Service firefighting efforts and hosts helicopters, lead planes and single engine air tankers (SEATs) during wildfire season. These aerial firefighting aircraft must operate wherever the wildfires are, which may potentially lead them into the airspace of the proposed interconnection and wind projects.

[14] Springerville Town Councilman Barry Williams.

Regional Medical Air Ambulance Base. Springerville Municipal Airport is used for emergency medical air evacuation of Arizona and New Mexico residents within a 50-mile radius of White Mountain Regional Medical Center in Springerville. The air ambulance company's turbine aircraft is hangered here on standby to transport patients along the route where the wind turbines will be located. Flying at an altitude of 11,000' MSL, they regularly experience the downdrafts described above. Medical evacuation helicopters are also sometimes deployed to our airport for transport and rescue. The unpredictable downdrafts, crosswinds and turbulence they often experience would be dangerously compounded by an industrial scale wind project in their flight path.

New USDOT Wind Turbine Setbacks. On 7/29/25, Transportation Secretary Duffy announced new policies related to wind turbines near highways and railroads, restoring safety recommendations previously overruled by the Biden administration. This action was the result of discovering dozens of wind energy projects approved by the previous administration despite safety warnings from engineers. The USDOT will now recommend a minimum 1.2-mile setback for turbines built near highways and railroads following a recent report that found "wind farm deployment could potentially obstruct radio communication links and/or degrade radio RF signal reception by means of lowering signal to noise ratio through several mechanisms and factors such as diffraction, scattering, wind farm density, distance, speed, etc."[15]

There are at least 41 wind turbines planned within 1.2 miles of the shoulder of US Highway 60. Furthermore, with turbines along both sides of US 60, the Applicant will be using this federal highway as their main entry and exit point for construction and operations. Pavement damage resulting from heavy equipment and material transport will likely be very costly to repair. US Hwy 60 is the main highway for commerce to and from our communities. The 10-mile segment of the wind project between MP 370 and MP 380 is 2 lanes, with no passing lanes. Traffic along the highway will be hampered by oversized trailers moving turbine parts, massive cranes, concrete trucks, water trucks, and other heavy construction equipment. Extra wide turns needed by oversized trailers will require lengthy interruptions in highway traffic flow. Finally, and of gravest concern, ambulances transporting patients to medical facilities in the region's largest town, Show Low AZ, will experience potentially life-threatening delays if the interconnection project is approved in the proposed location.

3. REAL ESTATE IMPACTS (CEC Factor 6)

While we recognize that the ACC and Line Siting Committee only have jurisdiction over the interconnection line, the following concern addresses Item 2 of the ACC Order Remanding for Further Proceedings, which clearly states:

> *2. Additional evidence about land use plans in the affected area of jurisdiction, and any other matter of public concern, is necessary in balancing the need for an adequate, economical and reliable supply of electric power against the impact on the area of jurisdiction.*

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[15] *President Trump's Transportation Secretary Sean P. Duffy: Biden-Buttigieg Ignored the Dangers of Wind Turbines Near Railroads & Highways, Put Climate Religion Ahead of Safety*; USDOT Press Release, 7/29/25.

The impact of wind turbines on property values is disputed by the wind industry, however, the real estate professionals in our community are convinced that the wind project and interconnection line will diminish property values in and around our community, including the severely impacted neighborhoods of Greens Peak Hideaway, Hidden Meadows Ranch and other properties accessed by CR 3123, where the interconnection line would begin and Substation 1 would be situated. Our Realtors regularly service these areas, as well as the community of Vernon, where the wind project, interconnection line and beacon lights will be highly visible.

The majority of our residents do not have a positive perception of wind projects and many homeowners in our community are concerned about the visual impact of the projects, leading to anxiety about their property values. The industrial-scale intrusion associated with these projects is disturbing to the peace, solitude and natural beauty that they have always taken for granted. There is near universal agreement that they are unsightly, and will ruin our majestic views.

Because perception usually drives the buying decision, there is a general sense that real estate values will diminish in our communities if the interconnection project is approved in the proposed location. There is also a growing awareness that wind turbines cause health problems. Simply put, it seems impossible to believe that wind turbines would actually add to a property's value in our real estate market.

Many analyses by real estate and appraisal professionals support our residents' concerns. The following are just a few examples:

- In "High-Voltage Transmission Lines and Rural, Western Real Estate Values" published in *The Appraisal Journal* 2012, Dr. James A. Chalmers, qualified as an expert witness in over 20 states, found that residential properties near transmission lines sold for 20-50% less than comparable residential properties.

- Michael McCann, of McCann Appraisal, LLC based in Chicago, concludes that: "Residential property values are adversely and measurably impacted by close proximity of industrial-scale wind energy turbine projects to the residential properties," up to 2 miles and a range of 25% to approximately 40% of value loss.

- John Leonard Goodwin, who has been a real estate broker for more than 10 years in Ontario, Canada, reports that wind turbines absolutely do impact property values: "Turbines complicate your property enjoyment, period. That alone spells depreciated value...they will also cause a significant loss of real estate value."

- According to research in 2014 by the London School of Economics, wind farms can cut as much as 12% off the value of homes within a 2 kilometer radius (1.24 miles), reducing property values as far as 14 kilometers (8.7 miles) away.

- In 2013, an Ontario Superior Court of Justice determined that landowners living near large wind farms do suffer from lower property values, with the court accepting a 22-55% reduction.[16]

- Realtor surveys conducted in 2009-2010 by Appraisal Group One, a Wisconsin firm specializing in eminent domain, utility easements, and complex property analysis, found that media reports of negative health issues and value issues influence a negative perception of property values in wind turbine areas. Impact studies simultaneously conducted suggest that values are substantially negatively impacted in the range of -12% to -40%.

CONCLUSION AND APPEAL.

Based on the evidence we offer that the wind project and interconnection line will forever damage the landscape, and thus the tourism economy, aviation safety, and real estate values of our community, the Town of Springerville requests that the Line Siting Committee and the Arizona Corporation Commission, deny this Application.

Respectfully,

Ted Soltis, Interim Town Manager
for SPRINGERVILLE TOWN COUNCIL

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[16] *Do Wind Turbines Lower Property Values?* Jude Clemente, Forbes. 9/23/15.
https://www.forbes.com/sites/judeclemente/2015/09/23/do-wind-turbines-lower-property-values/

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