

EXHIBIT J SPECIAL FACTORS

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

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

Exhibit J-1.	Stakeholder Group Information Packets
Exhibit J-2.	Project Newsletters
Exhibit J-3.	Public Meeting Boards
Exhibit J-4.	Website
Exhibit J-5.	Agency Letters Received

INTRODUCTION

This exhibit includes information on the public and agency involvement program conducted for the Rosemont 138kV Transmission Line Project. As part of the overall planning process for siting the line, an extensive public involvement program was initiated in 2008 and continued into 2011 to notify and educate the public, agencies, community leaders, and other affected or interested parties of the proposed project and to allow participation throughout the environmental planning process.

PUBLIC AND AGENCY INVOLVEMENT PROGRAM SUMMARY

Public and agency involvement was an integral part of the environmental planning process for this project. TEP and EPG facilitated the public and agency involvement process that began early in the siting study, offering the community an opportunity to obtain information and provide input at all stages of the project. Through these activities, the community became instrumental in the planning process. This process was intended to ensure effective and timely communication between TEP and EPG staff, the public, agencies, and other interested parties. Several different public outreach efforts were used to inform the members of the community in the study area. Those efforts included:

- Community and agency briefings
- Stakeholder group
- Public open houses
- Telephone information line
- Internet website (including online comment form and interactive project map)
- Newsletters

The outreach effort was designed to offer multiple opportunities for interested parties to gain information and provide input. In each key step of the planning process, the public was presented with an opportunity to review and comment on new and updated project information. The public

process allowed the project team to be responsive to the comments and concerns expressed. The methods of communication and public interaction listed above are explained below.

Community and Agency Briefings

In order to introduce the proposed project, gauge the level of public concern, and identify potential issues, a number of key individuals within the various jurisdictions and agencies were identified to meet with and introduce the proposed project. At these briefings, project team members explained the purpose and need of the project, project description, and the environmental siting process, and asked for suggestions and opinions. TEP received input on concerns and sensitive resource areas within the study area. Community leaders and others that were briefed are included in Table J-1.

Table J-1. Community and Agency Briefing List	
Agency/Organization	Name/Title
U.S. Forest Service	John Able, Deputy Director of Communications
	Andrea Campbell, NEPA Coordinator
	Teresa Ann Ciapusci, Project Manager
	Beverly Everson, Geologist
	Reta Laford, Deputy Forest Supervisor
	James Copeland, Nogales District Ranger
	Mindee Roth, Special Assistant to Forest Supervisor
Arizona State Land Department	Ruben Ojeda, ROW Section Manager
Pima County Board of Supervisors	Patrick McKenna, Special Staff Assistant to Carroll, Ray, Supervisor, District 4
Pima County	Arlan Colton, Planning Director
	Neva Connolly, Office of Conservation Science and Environmental Policy
	Julia Fonseca, Environmental Planning Manager, Office of Conservation Science
	Nicole Fyffe, Executive Assistant to the County Administrator
	Chris Poirier, Assistant Planning Director, Development Services
	Sherry Ruther, Planning Manager, Development Services
	Nanette Slusser, Assistant to the County Administrator, Public Works Policy
City of Tucson	John Beall, Principal Planner
	Chris Kaselemis, Administrator, Comprehensive Planning Division
	Josh Pope, Director of Geospatial Services
Town of Sahuarita	Orlanthia Henderson, Planner
Mountain Empire Action Alliance	Alison Bunting
Sonoita Area Residents	13 residents
Corona De Tucson	33 residents

Regular briefings were held with Pima County and the CNF to provide updates to the project and request feedback and data input.

Stakeholder Group

During the initial phase of the project, key stakeholders in the regional study area that would have potential interest in the proposed project were identified. A stakeholder group, whose members are listed in Table J-2, was formed to represent a range of interests and opinions in a forum small enough to allow for thorough education of the participants, detailed discussion of issues, and informal dialogue. The intention of the group was to provide input during the process (not a decision making body). Representation in the group included federal, state and municipal agencies that have administrative jurisdiction within the project area; industry/business; and citizens on behalf of their communities/neighborhoods. Representatives from several agencies/organizations were contacted for possible participation in the group but declined (or did not respond to the request to participate) including Pima County (a county representative did attend meeting #6), Arizona Department of Transportation, Save the Scenic Santa Ritas, Sky Island Alliance, Sonoran Institute, and Coalition for Sonoran Desert Protection (represents numerous members including environmental and other organizations). Members were selected based on their knowledge of the project area, capability to commit the time required to participate in the stakeholder group throughout the planning process, and willingness to participate in an impartial manner. Phone interviews were conducted by EPG to introduce the project and solicit their participation in the planning process. Members of the stakeholder group participated in a series of six meetings at key milestones in the siting process. In addition to the meetings, stakeholder group members had an opportunity to participate in an optional field trip to the project site. A Rosemont representative also participated in these meetings to respond to questions regarding mine operations as it related to transmission line development and operation. Members were also informed of and encouraged to attend the public open houses which typically followed these meetings. Six meetings were held at TEP's downtown Tucson office and an optional field trip was arranged. The stakeholder group meetings (and optional field trip) were held on the dates listed below.

- February 12, 2009
- July 22, 2009
- December 10, 2009
- January 25, 2010 (optional field trip)
- March 5, 2010
- October 27, 2010
- May 12, 2011

Stakeholder group meeting No. 1 was held on February 12, 2009. In this first meeting, an overview of the purpose and need for the project, project schedule, public participation process, environmental data collected to date, opportunities for siting a 138kV transmission line, and potential issues and concerns for the project were discussed. During the meeting, the group was provided a packet of information that included power point presentation slides shown at the meeting, a planning process chart with the anticipated project schedule, a chart of the CEC application process, general siting criteria, a map of the preliminary study area, and a draft map of existing land uses in the project study area. Following the meeting with the stakeholder group, the siting criteria and secondary data were refined and presented to the public at open house meeting No. 1, held on March 24 and 25, 2009.

Stakeholder group meeting No. 2 was held on July 22, 2009. In this meeting, public comments were summarized, results of the opportunities and constraints analysis were reviewed, and preliminary alternative links were presented. The group was asked to review and provide comments on the preliminary links. The group was provided a packet of information that included power point presentation slides shown at the meeting. Following the meeting with the stakeholder group, preliminary alternative links were revised (links were added) in part to incorporate stakeholder group recommendations and presented to the public at open house meeting No. 2, held on August 27, 2009.

Table J-2. Stakeholder Group Members		
Agency/Organization	Name/Title	Area of Interest in Project
Coronado National Forest	Kent Ellett (primary)	Jurisdiction over land within the study area
	Teresa Ann Ciapusci	
	Bev Everson	
	James Copeland	
Bureau of Land Management	Linda Hughes (primary)	Jurisdiction over land within the study area
	Cindy Alvarez	
	Dan Moore	
Davis Monthan AFB	LTC Mark Harting (primary) Kurt Tek	Flight paths in the study area
Arizona State Land Department	Tim Bolton	Jurisdiction over land within the study area
Santa Rita Experimental Range	Steve Husman	Management of land within the study area
City of Tucson	Chris Kaselemis	Major urban area near the study area (within original study area boundary, prior to reduction in study area)
Town of Sahuarita	Orlanthia Henderson (primary)	The study area includes the Sahuarita incorporated boundary
	Sarah More	
	John Neuneubel	
Green Valley Coordinating Council, Planning Committee	Eddie Peabody	The study area includes the Green Valley planning area
Diamond Ventures	Bob Iannarino – primary (formerly with Diamond Ventures)	Real estate developer with properties in the regional study area
	Mark Weinberg	
	Ken Abrahams	
Farmers Investment Company (FICO)	Larry Robertson (primary), outside counsel	Agricultural business in the study area
	Nan Walden	
Citizens	Marshall Magruder	Concerned citizens
	Elizabeth Webb	

Stakeholder group meeting No. 3 was held on December 10, 2009. In this meeting, the public and agency comments received to date were discussed. EPG presented the environmental assessment methodologies, revised alternative links, and alternatives evaluation process. The stakeholder group was asked to provide input on the alternative routes. During the meeting, the

group was provided a packet of information that included power point presentation slides shown at the meeting. Stakeholder group members were offered an opportunity to participate in the optional field trip suggested in order to drive some of the route options (in January 2010). Following the meeting with the stakeholder group, some alternatives were eliminated from further consideration. The remaining alternatives were carried through the analysis process and presented at stakeholder group meeting No. 4 and public open house No. 3.

The optional field trip was held for the stakeholder group on January 25, 2010. The attendees were driven to approximate locations of alternative links to show how the links relate to the surrounding environment. Six stakeholder group members participated in this trip including a representative for Farmers Investment Company, along with additional individuals from TEP, CNF, citizens, EPG, and consultants. A bus was provided for transportation to allow an opportunity for conversation during the trip, and all but two of the participants opted to utilize the transportation provided. During the field trip, the group was provided a map that showed the links and the potential stops along the route.

Stakeholder group meeting No. 4 was held on March 5, 2010. The results of the impact assessment and six visual simulations of the transmission line alternatives were reviewed with the group in this meeting. Similar to previous meetings, the group was provided a packet of information that included power point presentation slides shown at the meeting, as well as a copy of each of the preliminary alternative route maps. Prior to the meeting, members of the stakeholder group were emailed maps of the preliminary alternative routes to be presented and discussed during the meeting and a comment form that would be used to submit comments on each of the alternative routes. The stakeholder group was asked to provide input regarding which alternative routes should be carried forward into the CEC application and submitted to TEP and EPG prior to public open house meeting No. 3. The final alternative routes recommended to be carried forward were presented at public open house meeting No. 3, held on April 13 and 14, 2010.

Stakeholder group meeting No. 5 was held on October 27, 2010. The primary purpose of this meeting was to provide an update and discuss the project schedule. During the meeting, the group was provided a packet of information that included a revised stakeholder group roster, power point presentation slides shown at the meeting, and a copy of the preferred and four alternative route maps. The Preferred Route and four alternative routes proposed to be carried forward in the CEC application were presented to the stakeholder group and at the public open house meeting No. 4, held on November 17, 2010. Similar to other meetings, the group was asked and did provide input regarding the routes. Several individuals indicated either full or partial support for the preferred route; one member supported Alternative Route 4 while another member supported portions of routes and suggested alternatives to the Project, such as on-site generation at the Rosemont operation site or undergrounding of the line.

Stakeholder group meeting No. 6 was held on May 12, 2011. The primary purpose of this meeting was to provide a project update and discuss the elimination of construction power options based on Rosemont's letter to TEP. The revised Preferred Route and four alternative routes being carried forward in the CEC application were presented to the stakeholder group. The group was provided a packet of information that included power point presentation slides

shown at the meeting and a map showing preferred and four alternative routes without the construction power alternatives.

When construction power options were still part of the Project, members of the stakeholder group suggested an alternative location for TEP to construct a new substation – as an alternative to providing construction power to Rosemont instead of constructing additional new transmission across Box Canyon Road (link 160). This became an alternative construction power option involving placement of a mobile transformer at the intersection of Helvetia Road and the 46kV transmission line (node of links 110 and 120) located on the SRER; Alternative Routes 2 and 3 included this option for construction power. It was also suggested that a construction power line not be included as a part of the Project. Eventually, the construction power options were removed from the Project because construction activities necessitating high voltage transmission could be performed when the line from the Toro Switchyard to the Rosemont Substation could be completed. Other stakeholder member suggestions included installing gas generation at the Rosemont mine operations site as well as undergrounding the line or using alternative pole finishes.

Meeting materials provided at each meeting are included in Exhibit J-1.

Public Open Houses

Four rounds of public open houses were held for the proposed project. The first round of meetings was held at two locations on two separate evenings: Acacia Middle School in Vail, Arizona, and Canoa Hills Social Center in Green Valley, Arizona. The second round, which occurred after the reduction of the study area, included one open house held at Rancho Resort Clubhouse in Sahuarita, Arizona. The third round consisted of two open houses: one at Corona Foothills Middle School in Corona de Tucson, Arizona and the other at Quail Creek Madera Clubhouse in Green Valley, Arizona. The fourth round consisted of one open house held at Rancho Resort Clubhouse in Sahuarita, Arizona. The time and location for each of these public open houses were announced in a newsletter or the website, and other media through news releases.

The format for the public meetings was primarily informal, held from 5:30 p.m. to 7:30 p.m. (meetings often extended an additional hour), which allowed community members to attend at their convenience. This arrangement gave community members the opportunity to review information displays and have one-on-one personal communication with members of the TEP and EPG technical staff. In addition to the one-on-one personal communication, and at the request of members of the stakeholder group and public, the third open house included a formal presentation with a question and answer session that took place from 6:30 p.m. to approximately 7:00 p.m. The fourth open house was held from 5:30 p.m. to 8:00 p.m., and also included a formal presentation with a question and answer session from 6:30 p.m. to approximately 7:00 p.m.

The open houses were held during key milestones in the process to present the most current information introduced in the newsletters and any additional relevant information, as well as to request comments from the public. The meetings' numerous stations included large maps and text boards that highlighted details of the project such as the project purpose and need, proposed

facilities, facility siting criteria and process, and environmental data. A laptop station with the preferred and alternative routes on Google Earth was available for the public to use at the third and fourth set of open houses, and an area was provided for attendees to sit and fill out comment forms. A court reporter was present at the second, third, and fourth open houses to allow additional opportunity for the public to submit comments regarding the proposed project. Project newsletters and information provided at public open houses are included in Exhibits J-2 and J-3.

Telephone Information Line

A toll-free telephone information line (1-866-632-5944) was established for the project. The automated message, in English and Spanish, provided basic project information and encouraged callers to leave a message requesting more information or a return call. The telephone number was advertised in the newsletters, as well as on the project website that was provided for the public to access updated project information. The information line voicemail was checked regularly, and more frequently following newsletter mailings and public open houses. All messages that required a response were provided by one of the appropriate project team members. Approximately 55 voicemails were received during the siting process. All messages received were entered into a comment tracking database.

Internet Website

Because more people are using the Internet as a primary source of information, TEP maintains a website featuring their various transmission line siting projects throughout southeastern Arizona. The site address is www.tep.com; the address specific to Rosemont is <http://tep.com/Company/News/Rosemont>. A page devoted to the proposed project was added to this website prior to initiation of the public process (see Exhibit J-4). As the Project progressed, an interactive Google Map/Earth viewer was added to the site to allow users to visualize the alternative routes using this web service.

The project website was updated regularly to include both general and specific information on the project, including the latest maps and each of the project newsletters. After each of the public open house meetings, the graphics presented were added to the project web page. The site also enabled people to submit comments via an online public comment form, or to request more information by providing to them the toll-free project information line number. The online public comment form offered a mechanism to track all comments received.

Newsletters

Over the course of the planning process, four newsletters were mailed out with a fifth newsletter to be mailed following the notice of the Committee hearings. Each newsletter provided project information on the status of the project and upcoming public meetings/open houses. Comment forms were mailed with the first four newsletters. Copies of the newsletters and comment forms are in Exhibit J-2.

The mailing list for the first newsletter had close to 43,000 addresses which extended well beyond the original regional study area. The three other newsletters were mailed to more than 20,000 addresses (the last mailing list contained approximately 23,000 addresses) and focused

primarily on addresses within the original regional study area. This mailing list remained as the basis for the mailings and was not reduced to match the revised smaller regional study area. Topics discussed in each newsletter are described below.

Newsletter #1, March 2009 – The newsletter introduced the project to the public and included a description of the proposed facilities, need for the project, environmental planning process, public participation opportunities, and study area map; provided an abbreviated planning process chart and schedule; announced the first set of public open houses for March 2009; and included a comment form.

Newsletter #2, August 2009 – This newsletter announced a change in the line’s connection point to TEP’s system and included a map of the revised study area; described preliminary routing options; provided an updated abbreviated planning process chart and schedule; announced the second public open house for August 2009; and included a comment form.

Newsletter #3, March 2010 – This newsletter provided an update on environmental and engineering studies; described preliminary alternative routes; summarized public comments received; provided an updated abbreviated planning process chart and schedule; announced the third set of public open houses for April 2010; and included a comment form.

Newsletter #4, November 2010 – This newsletter provided a project update including the final set of alternative routes; provided an updated abbreviated planning process chart and schedule; announced the fourth public open house for November 2010; and included a comment form.

Comments Received

Over the course of the public process, approximately 1,500 comment submittals were received regarding the proposed project. Comments were submitted through various methods including:

- comment forms
- messages from the telephone information line
- letters
- emails from the public, agencies, jurisdictions, and other interested parties
- faxes

This information was used to better understand the concerns of the community in regard to this project and incorporate the concerns in the detailed environmental analysis. Comments are briefly summarized below.

Agency/Jurisdiction Comments

The CNF sent a letter to EPG (July 23, 2010; see Exhibit J-5) providing comments and stating they were not ready to identify a preferred route; however, the CNF did express its preferences for the alternative routes as they pertain to various environmental resources. Generally, as indicated in their letter, the CNF supported co-locating the proposed project with the Rosemont water pipeline and preferred to have the minimum amount of utility lines on the Forest. From a cultural resource perspective, CNF indicated that Alternative Route 4 is preferred; however,

Alternative Route 4 is the least preferred for visual resources. For Alternative Route 4, link 160, it was requested that portions of the transmission line be placed just to the west of the proposed alignment within side canyons, in order to reduce potential visual impacts.

The ASLD sent a letter to Rosemont (August 3, 2009) deferring to the recommendation of the SRER (see below) and its choice of the Preferred Route.

The University of Arizona, SRER submitted letters to the ASLD (June 30, 2009; September 29, 2009; and December 16, 2009; see Exhibit J-5) that expressed support for the Preferred Route. It was also expressed that any route that bordered the northern boundary of SRER (referred to during the planning process as the northern route family and which was not one of the five routes presented in this application) would attract trespassers who would disrupt the operations of the SRER, and is, therefore, not preferred. The SRER also expressed its preference to avoid any route using Link 130 (such as Alternative Route 1 and Alternative Route 3), due to the adverse impact it would have on two repeat photo sites. SRER indicated it strongly opposed Link 120 (which is part of Alternative Route 2 and Alternative Route 3), because it would negatively impact 4 repeat photo sites, 5 long-term research study areas, 20 long-term permanent vegetation transects, 1 long-term livestock exclosure area, and 1 livestock watering facility.

Representatives from Pima County were given the opportunity to provide comment and participate in the planning process, and to become a member of the stakeholder group. Pima County representatives declined participation in the stakeholder group, but were briefed periodically during the planning process. Further, a Pima County representative did attend and made comments at the final stakeholder group meeting, held on May 12, 2011. The Pima County Board of Supervisors submitted a letter (March 20, 2009) that expressed opposition to the installation of transmission lines from any TEP facilities to the Rosemont operations. Another letter was sent (September 3, 2009) to TEP requesting that TEP hold a public hearing, including a single presentation followed by public input, and encouraged the location of this public hearing be held in the Vail/Corona de Tucson area. (This was accomplished through a public meeting on April 13, 2010 in Corona de Tucson.)

The Town of Sahuarita submitted a letter to EPG (October 7, 2009) that expressed their support for Alternative Route 4 as it was an existing 46kV transmission line corridor.

Agency and jurisdiction letters received are included in Exhibit J-5.

General Comments

Throughout the public process comments and concerns were expressed primarily on the overall mine project and need for the project, location of facilities, aesthetic considerations and scenic quality of the study area, natural resource considerations, and property values. Issues identified through these comments were incorporated into the evaluation of alternatives, where possible. The impact assessment of the routes emphasized avoidance of existing residential areas, to the extent possible, and co-location with the water pipeline or consolidation with the 46kV line to respond to visual, ground disturbance, and other concerns raised. A summary of the primary issues identified during the planning process is provided below.

Overall Rosemont Operations Project and Project Need – People expressed concern about the underlying purpose and need for the Project (which is the Rosemont mine plan of operations); therefore, some members of the public indicated that they could not support the transmission line. These comments were received throughout the process. Also, some public commenters expressed concern that the Project was proceeding ahead of federal approval for the Rosemont mining operations. Given they did not see a need for the Rosemont operations, they did not see a need for the Project. An effort was made by the Project team to explain that the Project would not be constructed if the Rosemont mine plan of operations does not receive requisite approvals. There were comments received that indicated support for the mine plan of operations and the Project.

Location of Facilities – Some comments indicated a preference for following existing linear features. Preferences were expressed for all three route families to either follow the northern boundary of the SRER, Santa Rita Road, or the 46kV line. As mentioned earlier, the primary land owner for all three of the route families, ASLD, indicated a preference for the Preferred Route that co-locates with the water pipeline – TEP’s preferred route.

Property Values – Concern for impacts to property values due to perceived impacts to views from existing and future residences was a concern expressed.

Aesthetics/Scenic Quality – There was concern expressed for impacting residential views of and from the Santa Rita Mountains as well as the scenic and visual landscape in general. Also, portions of the study area provide recreational opportunities, such as the Box Canyon area, with sensitivity to aesthetics and scenic quality. Pima County’s scenic designation of Santa Rita Road occurred during the planning process in February 2010. Also, some comments suggested using alternative colors or materials for the structures; e.g., galvanized or painted structures versus a self-weathering finish, or undergrounding the line. Many comments expressed concern for residential views from Quail Creek, Sycamore Canyon, and Corona de Tucson areas toward the Santa Rita Mountains. Residents in Helvetia as well as along the 46kV line also expressed concern regarding the alternative routes nearest to their homes.

Natural and Cultural Resource Considerations – Some comments expressed a concern for disturbance to the naturalness, wildlife, and a research area including SRER and the Box Canyon area. Also, concern for cultural resources in the Box Canyon area was indicated.

The majority of comments received when TEP identified the Preferred Route and requested feedback was favorable.

Meetings List

Table J-3 contains a summary list of the various meetings held for the project.

Table J-3. Project Meetings and Briefings with Agency/Organization/Public	
Agency/Organization	Name/Title**
U.S. Forest Service, Coronado National Forest*	John Able, Deputy Director of Communications
	Andrea Campbell, NEPA Coordinator

Table J-3. Project Meetings and Briefings with Agency/Organization/Public	
Agency/Organization	Name/Title**
	Teresa Ann Ciapusci, Project Manager
	Beverly Everson, Geologist
	Reta Laford, Deputy Forest Supervisor
	James Copeland, Nogales District Ranger
	Melinda (Mindee) Roth, Special Assistant to Forest Supervisor
Arizona State Land Department*	George Cardieri, ROW Administrator
	Ruben Ojeda, ROW Section Manager
Pima County Board of Supervisors	Patrick McKenna, Special Staff Assistant to Ray Carroll, Supervisor, District 4 (attended meeting with Pima County staff)
Pima County*	Arlan Colton, Planning Director
	Neva Connolly, Office of Conservation Science and Environmental Policy
	Julia Fonseca, Environmental Planning Manager, Office of Conservation Science
	Nicole Fyffe, Executive Assistant to the County Administrator
	Chris Poirier, Zoning Administrator, Development Services
	Sherry Ruther, Environmental Planning Manager, Development Services
	Nanette Slusser, Assistant to the County Administrator, Public Works Policy
City of Tucson	John Beall, Principal Planner
	Chris Kaselemis, Administrator, Comprehensive Planning Division
	Josh Pope, Director of Geospatial Services
Town of Sahuarita	Orlanthia Henderson, Planner
Sonoita Area residents	13 residents
Corona de Tucson residents	33 residents
Stakeholder Group	
<ul style="list-style-type: none"> • February 12, 2009 • July 22, 2009 • December 10, 2009 • January 25, 2010 (optional field trip) • March 5, 2010 • October 27, 2010 • May 12, 2011 	
Public Meetings/Open Houses	
<ul style="list-style-type: none"> • March 24, 2009 – Vail, AZ • March 25, 2009 – Green Valley, AZ • August 27, 2009 – Sahuarita, AZ • April 13, 2010 – Corona de Tucson, AZ • April 14, 2010 – Green Valley, AZ • November 17, 2010 – Sahuarita, AZ 	
*More than one meeting occurred with this agency	
**Various attendees at different meetings	

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