

EXHIBIT H

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EXHIBIT H – EXISTING PLANS

As stated in R14-3-219 of the Rules of Practice and Procedure Before Power Plant and Transmission Line Siting Committee, Exhibits to Application, Exhibit H:

“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.”

The following sub-exhibits include information responsive to R14-3-219, Exhibit H. Exhibit H-1 contains analysis of the existing land uses, land use plans, and any known development plans in the Vail to Tortolita 230 kV Project study area, as well as the anticipated impacts of the Project on those land uses and plans. The study area for this review is 1 mile on either side of the right-of-way (ROW) centerline of the Project (2 miles in total).

The Project is an upgrade of an existing transmission line owned and operated by Western Area Power Administration (WAPA). The 64-mile route will include the replacement of wood H-frame poles with steel monopoles in approximately 52 miles of existing transmission line right-of-way (ROW). The Project will also include four realignments outside the current ROW, totaling approximately 12 miles (Vail Lateral realignment [segment U4 in the Final Environmental Impact Statement (Final EIS)], Old Vail Road realignment [segment U3aPC in the Final EIS], Tumamoc Hill realignment [segments TH1a and TH1 Option in the Final EIS], and Marana Airport realignment [segment MA-1 in the Final EIS]).

Existing land use for the Project is mapped in Exhibit A-4 and future land use is mapped in Exhibit A-5. Exhibit H-2 contains a copy of the letter provided by TEP to relevant jurisdictions; written responses received will be included in the supplemental filing.

Exhibit H-1	Existing Plan Analysis
Exhibit H-2	Letter and Written Responses

EXHIBIT H-1 – EXISTING PLAN ANALYSIS

As stated in the Arizona ACC Rules of Practice and Procedure R14-3-219, the analysis in this Exhibit focuses on state, local, and private existing uses and land use plans.

“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.”

INTRODUCTION

The following analysis describes the current landscape and existing land use and land use plan goals and policies within the study area. The study area for this review is 1 mile on either side of the right-of-way (ROW) centerline of the Project (2 miles in total). This study area is consistent with the analysis area used in the Final Environmental Impact Statement (Final EIS) (see Exhibit B-1). The following summary is based on the 2015 Final EIS (Exhibit B-1), with information focused on the analysis area for the Project.

The Project is an upgrade of an existing transmission line owned and operated by Western Area Power Administration (WAPA). The 64-mile route will include the replacement of wood H-frame poles with steel monopoles in approximately 52 miles of existing transmission line ROW. The Project will also include four realignments outside the current ROW, totaling approximately 12 miles (Vail Lateral realignment [segment U4 in the Final EIS], Old Vail Road realignment [segment U3aPC in the Final EIS], Tumamoc Hill realignment [segments TH1a and TH1 Option in the Final EIS], and Marana Airport realignment [segment MA-1 in the Final EIS]).

OVERVIEW

An extensive discussion of the federal jurisdictions land use regulations, policies, and plans in the study area can be found in Exhibit B-1, Final EIS Section 3.11.

The Project will traverse federal, state, tribal, and local agency jurisdictions with existing land use plans and policies (see Exhibit A-3, Land Ownership and Jurisdiction). These policies cover land ownership including federal, state, tribal, county, and private lands. Land use jurisdiction refers to the limits of administrative authority maintained by federal, state, tribal, regional, or local government agencies responsible for land use planning and policies. A summary of surface management and land ownership in the Project study area and ROW is presented in Table H-1.

Table H-1. Surface Management and Land Ownership Acreage Within the Study Area and ROW.

Entity	Study Area	ROW
Private	50,802	484
State	26,275	274
County	646	5
Bureau of Land Management	265	2
Department of Defense	39	0
Bureau of Reclamation	476	5.5
National Park Service	95	0
Tribal	3,587	35

Prior to and during the National Environmental Policy Act and EIS process, the Southline Transmission Line LLC (Southline) team met with agencies, representatives, and local stakeholders. These outreach efforts are detailed in Exhibit J-2.

In 2016 as part of the line siting application, for which Southline received a CEC (CEC Line Siting Case 173), Southline sent a request for additional information to jurisdictions relevant to the facilities that were subject to the CEC. That information was integrated into the 2016 application and land use summary (see Case 173 Exhibit H).

TEP sent a request for additional information for this application amendment to nine jurisdictions on October 16 2020. The written responses will be included in the supplemental filing. Table H-2 below provides a listing of the entities/jurisdictions to which letters were sent. TEP will also host a virtual meeting via Microsoft Teams with certain parties, and this information will be included in the supplemental filing.

Table H-2. Entities that were mailed Project Request for Information Letters

Arizona State Land Department
Pima County
Pinal County
City of Tucson
Town of Marana
Town of Sahuarita
Tucson International Airport

Arizona State Land Department
Marana Airport
Bureau of Land Management – Tucson Field Office
Bureau of Indian Affairs

Though not in the study area, the Town of Sahuarita was contacted in consideration of their future plans.

LAND USE PLANS; DEVELOPMENT PLANS

State and local agency jurisdictions that will be traversed by the Project have adopted land use plans and regulations that guide the type, time, and intensity of land use. An inventory of applicable land use plans was conducted for the EIS in 2012 and 2015, to determine which land use plans may intersect with the Project. State and local jurisdictions with land use policies in the study area include Pima and Pinal Counties, the city of Tucson, and the Arizona State Lands Department (ASLD).

Local Government Plans

Pima County Comprehensive Plan

The Pima County Comprehensive Plan (2009, as amended 2015) was updated via the “Pima Prospers: Pima County Comprehensive Plan Initiative.” The Plan assigns special designations (including parks, open space, and scenic road designations) and lays out policies for land uses within those unincorporated areas of the County; for incorporated areas, land use planning as specified in the municipalities’ general plan is applicable. The 2015 plan, as amended, is the current guiding plan.

The Pima County Zoning Ordinance designates zoning districts and establishes a land use intensity map. The ordinance, however, does not specifically address transmission of electricity, although electrical transmission requires a Conditional Use Permit under some zoning districts (Pima County 1992, 2011). The Project will require a conditional use permit for portions of the Project that occur on county lands, as appropriate. Modifications to existing permits or new permits as may be required for electrical substations over 115 kilovolts (kV) will be coordinated by the Pima County Development Services Department. All of the substations included in this application are existing facilities that will be interconnected into and in some cases expanded.

In Pima County, the existing ROW and realignment areas cross zoning classes including CB-1 (local business), CI-2 (general industrial), CR-1 (single residence), GR-1 (rural residential),

IR (institutional reserve), RH (rural homestead), SH (suburban homestead), SP (specific plan) and SR (suburban ranch). The most common (36%) zoning classification is RH. U3aPC, a realignment of the ROW, will cross CI-2 and RH zoning classes.

Pima County Sonoran Desert Conservation Plan

Pima County maintains important biological, ecological, and natural resources under their 2012 Sonoran Desert Comprehensive Plan (SDCP). The 2012 SDCP is guiding regional efforts to conserve the best lands and most precious resources for future generations of Pima County residents to enjoy. As part of the SDCP, the associated Pima County Multi-species Conservation Plan (MSCP) combines short-term actions with long-range land-use decisions in Pima County, to avoid, minimize, and mitigate impacts to species protected under the Endangered Species Act (ESA) and their habitats. Further discussion of the SDCP and MSCP can be found in Exhibit B-1, Final EIS Section 3.8.

The SDCP designates a Conservation Lands System (CLS), which identifies lands within Pima County necessary to achieve the SDCP goals, while delineating areas suitable for development. The CLS land-use policies apply only to discretionary actions of and lands owned and/or managed by the Pima County and the Pima County Regional Flood Control District Boards. CLS policies do not apply to privately owned lands unless the landowner takes it upon themselves to adopt CLS land-use policies. CLS lands include important riparian areas, biological core management areas, special species management areas, multiple use management areas, scientific research areas, agricultural in-holdings, and critical landscape connection corridors. CLS lands are further discussed in Exhibit B-1, Summary of Final EIS.

Pinal County Comprehensive Plan

The 2009 Pinal County Comprehensive Plan, as amended through 2015, guides and manages the County's future growth, quality of life, and sustainability. The 2015 amended plan is the current guiding Plan. Policy 7.6.1.6 and Goal 7.7 of the plan directly address transmission of electricity: "Support the transmission of renewable energy from sources within and outside of Pinal County," and "support the provision of adequate energy for the future while protecting the natural environment and resources" (Pinal County 2015). The Pinal County Zoning Ordinance provides rules, regulations, and plans by which the future growth and development in the county may be directed in accordance with the Pinal County Comprehensive Plan and ordinance, as provided in the County Planning and Zoning Act of 1949. Section 2.150.010 states that transmission lines for the distribution of electricity and power substations shall be permitted in any zoning district and not be subject to the minimum lot area requirement (Pinal County 2015).

The study area includes portions of the Red Rock growth area. The Red Rock growth area is a mixed use residential and employment area that will link Southern Pinal County and Northern Pima County (Pima County 2015). Pinal County Comprehensive Plan Land Use Categories present within the study area include Airport Reserve, Employment, General Public Facilities/Services, High Intensity Activity Center, Moderate Low Density Residential, Very Low Density Residential, and Open Space.

In Pinal County, the existing ROW and realignment areas cross zoning classes including GR (general rural), CB-2 (general business zone) and CI-2 (industrial zone). The most common zoning classification for the ROW in Pinal County is GR (+95%).

City of Tucson General Plan

Plan Tucson, the City of Tucson's General Plan, adopted in November 2013, presents a series of policies and recommendations for Tucson and, in some cases, all of eastern Pima County. It is in effect only within the corporate limits of the city of Tucson. The policies establish a basic direction and approach to guide the future growth and development of Tucson. The plan does not include management prescriptions for transmission line construction.

The policies also provide guidance for the preparation of more detailed environmental, land use, and transportation proposals; the refinement of community facility and service plans; and the development or amendment of subregional, area, neighborhood, and other specific plans. The City of Tucson Land Use Code was published on July 1, 1995, to protect and promote the general health, safety, and welfare of all present and future residents of Tucson. More specifically, the Land Use Code implements the City's General Plan.

In the City of Tucson, the existing ROW and realignment areas cross zoning classes including C-1 (local commercial), C-3 (general and intensive commercial), I-1 and I-2 (light and heavy industrial), MH-1 (mobile home), O-3 (office), P-I (park industrial), R-1 (residential single family), R-3 (high density residential), RH (rural homestead), RX-1 and RX-2 (low density residential), and SH (suburban homesite). The most common zoning classifications are P-I (12.8%), R-1 (15.6%), and RX-1 (13.7%). Within the City of Tucson, the realignment areas around Tumamoc Hill cross zoning class R-1 and RX-2.

Town of Marana General Plan

Make Marana 2040, the Town's General Plan, adopted in August 2020, presents a series of policies and recommendations for Marana and serves as the blueprint for future growth. It is in effect only within the incorporated town limits for the Town of Marana.

In the Town of Marana, the existing ROW and realignment areas cross zoning classes including C (large lot zone), F (specific plans), R-144, R-16, R-36, R-6, and R-7 (residential). The most common zoning classifications are F (27.2%), and C (25%). Within the Town of Marana, the realignment areas around the Marana Airport cross zoning class C.

State Government Plans

Arizona State Land Department

ASLD-owned lands are not public lands, but are instead the subject of a public Trust created to support the education of Arizona children. The Trust accomplishes this mission in a number of ways, including through its sale and lease of Trust lands for grazing, agriculture, municipal, school site, residential, commercial, and open space purposes. The ASLD lands included in the study area are nearly all managed for recreation, grazing, rangeland management, and commercial and open space purposes. To cross ASLD lands, Southline must acquire a ROW. ROWs are granted across ASLD lands for a variety of uses, such as access roads, infrastructure, and power lines. Approximately 274 acres of land managed by the ASLD are intersected by the Project.

The ASLD administers grazing on state lands. The ASLD issues grazing leases to ranchers following protocol issued in the “Arizona Standards for Rangeland Health and Guidelines for Grazing Administration” (University of Arizona 2012). The intent is to provide standards to ensure healthy rangelands, with management coordinated between the state and federal agencies. A summary of federal farm and rangeland laws, programs, and policies is located in Exhibit B-5, Summary of Final EIS.

Arizona State Land Department Conceptual Land Use Plans

ARS 37-331.03 directs the ASLD to create conceptual land use plans for urban state trust lands as appropriate. ASLD has developed several conceptual land use plans to help identify appropriate land uses, transportation corridors, and infrastructure requirements, and natural and artificial constraints and opportunities associated with the land. The Houghton Road Corridor Conceptual Plan (ASLD 2004) is within the study area, but the project footprint would not be located within the planning area for the Houghton Road Corridor.

Federal Government Plans

The study area includes lands managed by the Bureau of Land Management (BLM), Department of Defense (DOD), and Bureau of Reclamation (BR) (see Table H-1 and Exhibit A-3, Land Ownership and Jurisdiction).

Private Entity Plans

No private entity plans were identified on private lands in study area. Although the Project and substations at Vail and DeMoss Petrie are located within the city limits of Tucson, they are located in non-residential areas. No new planned residential subdivisions are identified in the study area in the Final EIS. Pending requests to entities listed in Table H-1 may identify additional development information since the 2015 EIS.

Military

The Project is in the vicinity of DOD Lands, Military Training Routes (MTR), and Military Operations Areas (MOA). Federal policies relating to the Project and military land uses are summarized in Exhibit B-5, Summary of Final EIS.

EXISTING LAND USE

The study area is a mix of undeveloped land and heavy to moderate land uses (commercial and residential). The existing WAPA 115-kV transmission line has been in place dating back to the 1950s. Project substations owned by WAPA, TEP, and others along the route have also been in existence for years. The route crosses swaths of otherwise undeveloped state lands west and south of metropolitan Tucson.

TEP and WAPA will realign the existing WAPA ROW south of the Tucson International Airport (TIA) along Old Vail Road in an area that has some residences in the community of Summit, just south of Old Vail Road, east of Nogales Highway. This realignment (analyzed as U3aPC in the Final EIS) was developed due to information provided by Pima County about their interest in and plans to redevelop the area south of TIA. See the future land use discussion below for more.

The existing WAPA line also crosses the San Xavier District of the Tohono O'odham Nation east of I-10 and west of South Nogales Highway. North of the San Xavier District, the existing ROW parallels I-10 in areas and is surrounded by commercial and residential development. As the line heads north and west of Twin Peaks Road, the existing WAPA line crosses open desert and agricultural fields.

Farm and Rangelands

Despite the arid climate, farmlands do exist in the study area, aided by irrigation where more permanent water sources are present from groundwater pumping. The majority of the rangeland within the study area consists of grazing lands managed by the State of Arizona on ASLD lands. The study area contains cultivated crops, pasture/hay fields, and grassland/herbaceous rangelands used for grazing.

Military

The study area for the Project includes MOAs and MTRs. Due to the presence of MTRs in the study area, transmission line structures cannot exceed 200 feet tall.

Tucson International Airport is home to the U.S. Air Force 162nd Fighter Wing (FW), which trains pilots in the F-16 Falcon fighter aircraft. Specific military airspace operations categories that intersect the study area include Low Altitude Step Down Training, Low-Altitude Navigation, Low-Altitude Tactical Formation, and Low-Altitude Awareness Training.

Davis-Monthan Air Force Base is located in the Tucson metropolitan area; however, it is not within the analysis area. At its closest point, Davis-Monthan is over 5 miles away. No impacts are anticipated from the Project.

The Arizona Army National Guard, Silver Bell Army Heliport, is located about 30 miles northwest of Tucson in Marana, Arizona, in the Pinal Airpark Area. The Army National Guard trains helicopter pilots near the Tortolita Substation. Military training flights occur between 1,000 and 10,999 feet above mean sea level. The Tortolita interconnection (segment U3I) will introduce changes to the existing airspace obstructions on approach and departure of the Silver Bell Army Heliport; see discussion below and in Exhibit B-5, Summary of Final EIS. Pinal Airpark is also the home to DOD Parachute Training and Testing Facility at the West Drop Zone of Pinal Airpark.

PROPOSED LAND USES AND DEVELOPMENTS

For those municipalities that do have relevant land use management plans (i.e., Tucson), a review of local plans did not identify any anticipated activities within the study area that would substantially or substantively differ from current land uses (see Exhibit A-5, Future Land Use). Therefore, planned land uses are assumed to be the same as existing land uses.¹

Future development on privately owned lands under county or municipality planning jurisdiction will require approval by the respective jurisdiction's planning and development departments. Development of subdivisions and master planned communities in the Tucson metropolitan area or elsewhere will require extensive planning and coordination with the county and city Development Services Departments (e.g., subdivision plat approval, substantive review by applicable departments of all onsite and offsite infrastructure needs). Final subdivision plats are approved by the municipal City Council or County Board of Supervisors after a public hearing.

Development on state lands will occur through a lease or sale of state Trust properties by ASLD. TEP will work with ASLD to avoid creation of remnant parcels where the WAPA ROW will be

¹ [Placeholder – additional information will be evaluated and discussed during the project hearing].

realigned along Old Vail Road (U3aPC), around Tumamoc Hill (TH1 Option and TH1a) and near the Marana Airpark (MA-1).

The WAPA ROW on private land already has easements in place.

The three realignments of the existing WAPA ROW were developed during the EIS process in response to stakeholder feedback. In particular, U3aPC and MA-1 were developed in response to feedback from Pima County and the Arizona Army National Guard, respectively, about future uses. U3aPC was developed due to information provided by Pima County about their interest in and plans to redevelop the area south of the TIA, north and south of Old Vail Road. MA-1 was developed in response to comments from Army National Guard and proposed uses planned at the Marana Airport.

As noted above, U3aPC was developed to allow for future development south of the airport. This realignment would remove the existing WAPA ROW from crossing otherwise undeveloped parcels at an angle, and to “open up” these lands to more development, consistent with plans for the Sonoran Corridor. The Sonoran Corridor is a 50-square-mile area surrounding the TIA that will protect Raytheon from encroachment and allow for the construction of Aerospace Parkway/Auxiliary Interstate Highway, the construction of a second runway at TIA, development of a business park, and the addition of a commuter rail line. A land use planning concept has been developed for the Sonoran Corridor.² The realignment of the ROW along Old Vail will allow for light and heavy industrial development north and south of Old Vail Road, and not change residential development in the community of Summit. The land use concept for Sonoran Corridor also includes development of a rail line along this segment of Old Vail Road as well.

POTENTIAL EFFECTS

Land use impacts may be defined primarily as: 1) restrictions on a land use that would result from the construction or operation of a proposed Project; or 2) incompatibility with existing plans. Typically, restrictions on land use would result from right-of-way or easement acquisition across a property. TEP will not need to acquire ROW for over 80% (approximately 52 miles of the 64 miles) of the line as WAPA holds easements with the landowners for their existing line. Rebuilding a transmission line in place on an existing ROW with its associated existing access roads, etc., in a location where it has been for over 60 years would obviously result in the least environmental impacts of other options considered in the EIS, since the baseline already includes any existing impacts. However, responsible transmission line planning also looks for

² https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Economic%20Development/Sonoran%20Corridor/Sonoran%20Corridor%20Draft%20Land%20Use%20Concept%20Plan.pdf

opportunities to reduce existing impacts, or address changing attitudes about the values and weights of impacts.

The approximately 12 miles of new ROW and realignments near Vail Substation, south of the Tucson airport, around Tumamoc Hill, and near the Marana Regional Airport will be located on a mixture of state trust and non-state trust lands. The connections in and out of the Vail Substation are located on state and Unisource (TEP) lands; the realignment along Old Vail Road is located on state and Tucson Airport Authority lands, the realignment around Tumamoc Hill is located on lands owned by the Arizona State Land Department, Pima County, and the Arizona Board of Regents; and finally the realignment near the Marana Regional Airport is located on state lands.

TEP will need to acquire right-of-way easements from property owners within these areas. TEP has not initiated talks with these landowners to identify constraints for siting the realignments contained in this application; these reroutes will likely be handled by WAPA. WAPA completed outreach in 2019 to private landowners to secure right-of-entry for pre-construction surveys. More information will be provided in the supplemental filing about landowner outreach as it becomes available from WAPA. All negotiations with landowners will be conducted in good faith, and the Project's effect on the parcel or other landowner concerns will be addressed.

Adjacent private landowners may experience minor, temporary nuisance impacts in residential areas during pole replacement and construction (i.e., noise, dust, and heavy equipment). The temporary impacts will be short-term and will cease once construction activities are completed at a particular segment. Proponent Committed Environmental Measures identified in WAPA and BLM's RODs (Exhibit B-3 and B-4) will be effective in avoiding or minimizing direct impacts with land uses in most conditions. The effect of the Project on adjacent land use within the study area will be negligible, as the Project is compatible with existing plans.

Potential effects on future or planned land use are generally associated with Project construction rather than operation because once the ROW grant has been made and construction is completed, no further changes to future or planned land use patterns are expected.

REFERENCES

- Arizona State Land Department (ASLD). 2004. Houghton Road Corridor Conceptual Plan. Available at: <http://www.houghtonroad.com/images/UpdatedProjectFactSheet.pdf>. Accessed October 2020.
- City of Tucson. 2013. Plan Tucson: City of Tucson General and Sustainability Plan 2013. Available at: https://www.tucsonaz.gov/files/integrated-planning/Plan_Tucson_Complete_Doc_11-13-13.pdf. Accessed October 2020.
- Pima County. 2009 (amended through 2015). Pima Prospers: Pima County Comprehensive Plan Initiative. Available at: <http://webcms.pima.gov/cms/One.aspx?portalId=169&pageId=35831>. Accessed October 2020.
- . 2011. Protecting Our Land, Water, and Heritage: Pima County’s Voter-Supported Conservation Efforts. Tucson. Available at: http://www.pima.gov/cmo/admin/Reports/ConservationReport/PDF/POL_sm.pdf. Accessed July 2013.
- Pinal County. 2015. Pinal County Comprehensive Plan, as amended. Available at: <http://pinalcountyaz.gov/CommunityDevelopment/Planning/Documents/00%20Comprehensive%20Plan%202015.pdf>. Accessed October 2020.
- . 2011. Pinal County Zoning Ordinance. Combined Ordinances, October 2011.
- Town of Marana. 2020. Town of Marana General: Make Marana 2040 Available at: <https://www.maranaaz.gov/make-marana-2040>. Accessed October 2020.
- University of Arizona. 2012. Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. Available at: <https://www.blm.gov/sites/blm.gov/files/Arizona%20State%20guidelines.pdf>. Accessed October 2020.

EXHIBIT H-2 – LETTER AND WRITTEN RESPONSES³

³ [Placeholder – additional information will be evaluated and discussed during the project hearing].