



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457

MAR 13 2019

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Parks
1100 West Washington Street
Phoenix, Arizona 85007

RE: AZ Solar 1 Interconnection Project near Salome, La Paz County, Arizona (DOE/EA-2098)

Dear Ms. Leonard:

Western Area Power Administration (WAPA) is providing documentation and seeking your concurrence with a finding of effect per Section 106 of the National Historic Preservation Act. WAPA needs to respond to AZ Solar 1, LLC's (AZ Solar 1) request to interconnect their proposed photovoltaic solar plant located near Salome in La Paz County, Arizona to the Little Harquahala to Harcuvar 115-kilovolt Transmission Line. WAPA agreed to act as lead federal agency after discussions with the Bureau of Land Management (BLM), Lake Havasu Field Office, who manages the land under this transmission line, and Bureau of Reclamation (Reclamation) Phoenix Area Office, who holds the right-of-way for this line. In order to expedite consultation, WAPA combined multiple steps in the Section 106 process per 36 CFR § 800.3(g). After conducting identification efforts and evaluating resources, WAPA determined that the undertaking would result in **no historic properties affected** per 36 CFR § 800.4(d)(1).

I. Description of the Undertaking – If WAPA enters into an interconnection agreement with AZ Solar 1, then each entity would construct, operate, maintain, and eventually decommission the following new facilities.

WAPA would 1) install a tap connection consisting of one or two new poles structures in the existing transmission line easement on BLM land near wood pole Structure 14/1 located directly across from solar plant; 2) add guy-wires and associated buried concrete anchors to up to three existing H-Frame wood pole structures in the tap's immediate vicinity to provide additional structural support to the existing transmission line; 3) blade existing dirt access roads as needed for safety; 4) upgrade relays located inside the control buildings at the Little Harquahala and Harcuvar substations; and 5) work with BLM and Reclamation to amend right-of-way documents to include a new overhead conductor, less than 100 feet long, connecting the tap to the solar plant's substation.

On an approximately 480-acre parcel of private land, AZ Solar 1 would 1) build a 32.5-megawatt photovoltaic solar energy generation facility consisting of solar panels, access roads, fences, an underground electrical collection system, and an on-site substation; 2) build, now or in the future, an additional 27.5 megawatts of photovoltaic solar energy generation facilities

depending on market conditions; and 3) build, now or in the future, a 20-megawatt battery storage facility depending on market conditions.

The undertaking's location is shown on the enclosed map. WAPA's tap would occur in Section 13, Township 5 North, Range 14 West on the Gila and Salt River Baseline and Meridian (GSRBM). AZ Solar 1's solar energy generation facility would be located in Section 18, Township 5 North, Range 13 West on the GSRBM. The corresponding 7.5-minute USGS topographic map is Harcuvar, AZ.

WAPA and AZ Solar 1 would begin construction for the tap and the first solar field by July 2019. WAPA estimates that its construction would take 45 days to complete, and AZ Solar 1 estimates 4 to 6 months; both efforts could coincide. WAPA and AZ Solar 1 plan to be operational by December 31, 2019.

WAPA would use one each of the following equipment to build the tap: auger, backhoe, bucket truck, concrete truck, crane, grader, tractor, and water truck. AZ Solar 1 would use the following equipment to construct the solar plant: 1 crane, 3 dump trucks, 11 tractor/loaders/backhoes/graders, 5 water trucks, 1 well drill rig, and 1 wood chipper. They would also receive up to 100 loads of concrete delivered by concrete truck.

- II. Methodology and Reporting** – WAPA determined that undertaking's area of potential effects for ground disturbance covers approximately 483.5 acres, including 480 acres of private land and 3.5 acres of BLM land. The area of potential effects for visual impacts is a 5-mile radius around the new facilities, which is roughly the maximum distance a casual observer would be able to distinguish it from the surroundings.

At WAPA's direction, AZ Solar 1 sponsored a cultural resources survey of the undertaking's area of potential effects for ground disturbance. The resulting report, which is enclosed, is titled *Cultural Resources Survey for the AZ Solar 1 Project, La Paz County, Arizona* was prepared by SWCA Environmental Consultants in January 2019. It includes the results of background research as well as a pedestrian survey using parallel transects spaced 20 meters apart and the Arizona State Museum's site definition. During background research, WAPA identified a cultural survey of the transmission line right-of-way that supported a 2018 maintenance action; its results in the project area were negative. SWCA also conducted an analysis of the undertaking's area of potential effect for visual impacts, which is attached.

WAPA is consulting with Indian tribes regarding this undertaking, and these consultations are occurring concurrently. WAPA sent initial consultation letters to Indian tribes on October 24, 2018. WAPA met with Tribal Historic Preservation Office representatives from Colorado River Indian Tribes and discussed this undertaking on November 21, 2018. WAPA will update the consulting parties if new information is revealed or a disagreement arises.

WAPA sought input from the public about cultural resource information and identification methods during scoping process for the project's environmental assessment (DOE/EA-2098). We held a public scoping meeting on November 8, 2018, which 40 people attended. WAPA plans to seek comments on the finding and determinations herein during the comment period

for the draft environmental assessment. WAPA will update consulting parties if new information is revealed or a disagreement arises.

III. Resources Located, Identified, and Evaluated (Significance Criteria Considered) – Fifteen cultural resources were identified within the area of potential effects: two sites, one structure, and 14 objects. The following resources occur on private land associated with the solar plant:

Site AZ S:2:45(ASM) is ineligible for inclusion in the National Register of Historic Places (National Register) under any criteria. It consists of two rock features—a rock ring and a rock cluster—with no associated artifacts. Based on surface observations, these features are unlikely to contain subsurface archaeological deposits. The site lacks association with an important historic context and warrants no further study at this time.

Site AZ S:2:46(ASM) is ineligible for inclusion in the National Register under any criteria. It consists of two rock clusters and a diffuse scatter of fire-cracked rock with no associated artifacts. Based on surface observations, these features are unlikely to contain subsurface archaeological deposits. The site lacks association with an important historic context and warrants no further study at this time.

Isolated Occurrences (IOs) 1–14 are ineligible for inclusion in the National Register under any criteria. Eight of the IOs date to the historic-era and include two broken bottles (IOs 2 and 5), two occurrences of motor oil cans (IOs 3 and 9), three occurrences of food or beverage cans (IOs 3, 7, and 13), and one U.S. General Land Office benchmark (IO 1). These IOs lack association with an important historic context and warrant no further study. Six of the IOs attest to Native American use of the project area and include four rock clusters (IOs 6, 10, 11, and 14), one ground stone artifact (IO 8), and one flaked stone artifact (IO 12). These IOs are of unknown temporal association; further investigation of the features would provide no information significant to our understanding of the region's prehistory.

The following resource occurs on a public right-of-ways located outside the solar plant parcel:

US 60 is a previously recorded historic-period paved highway still in use today as part of Arizona's highway system. It runs from Richmond, Virginia, to Los Angeles, California, and in Arizona, from east to west, it connects Springerville, Show Low, Globe, Phoenix, Salome, and Parker. In 1932, highway administrators assigned the designation US 60 to the route through Salome. This structure was previously determined eligible for inclusion in the National Register under Criteria A (Event) and D (Information Potential).

IV. Effects Determination and Compliance Decision – Effects determinations are the responsibility of the lead federal agency. WAPA considered the nature of the undertaking and the presence of historic properties that possess integrity and meet at least one of the criteria necessary for inclusion in the National Register.

WAPA determined that undertaking would result in **no historic properties affected**. Although one historic property, US 60, is present within the area of potential effects, travelers

driving at normal speeds headed in either direction would see little to minimal change in the setting. The closest the highway comes to the solar generation plant site is 1100 feet.

Please concur with our determinations of eligibility and finding of **no historic properties affected**. If you have any questions please contact Environmental Planner and Archaeologist Mr. Matthew Bilsbarrow at (602) 605-2536 / bilsbarrow@wapa.gov or myself at (602) 605-2842 / berry@wapa.gov.

Sincerely,


Sean Berry
Environmental Manager

enclosures (map, report, forms)

cc. w/ enclosure (map)

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