

Papermill Wind Project

Navajo County Board of
Supervisors Meeting

October 13, 2026

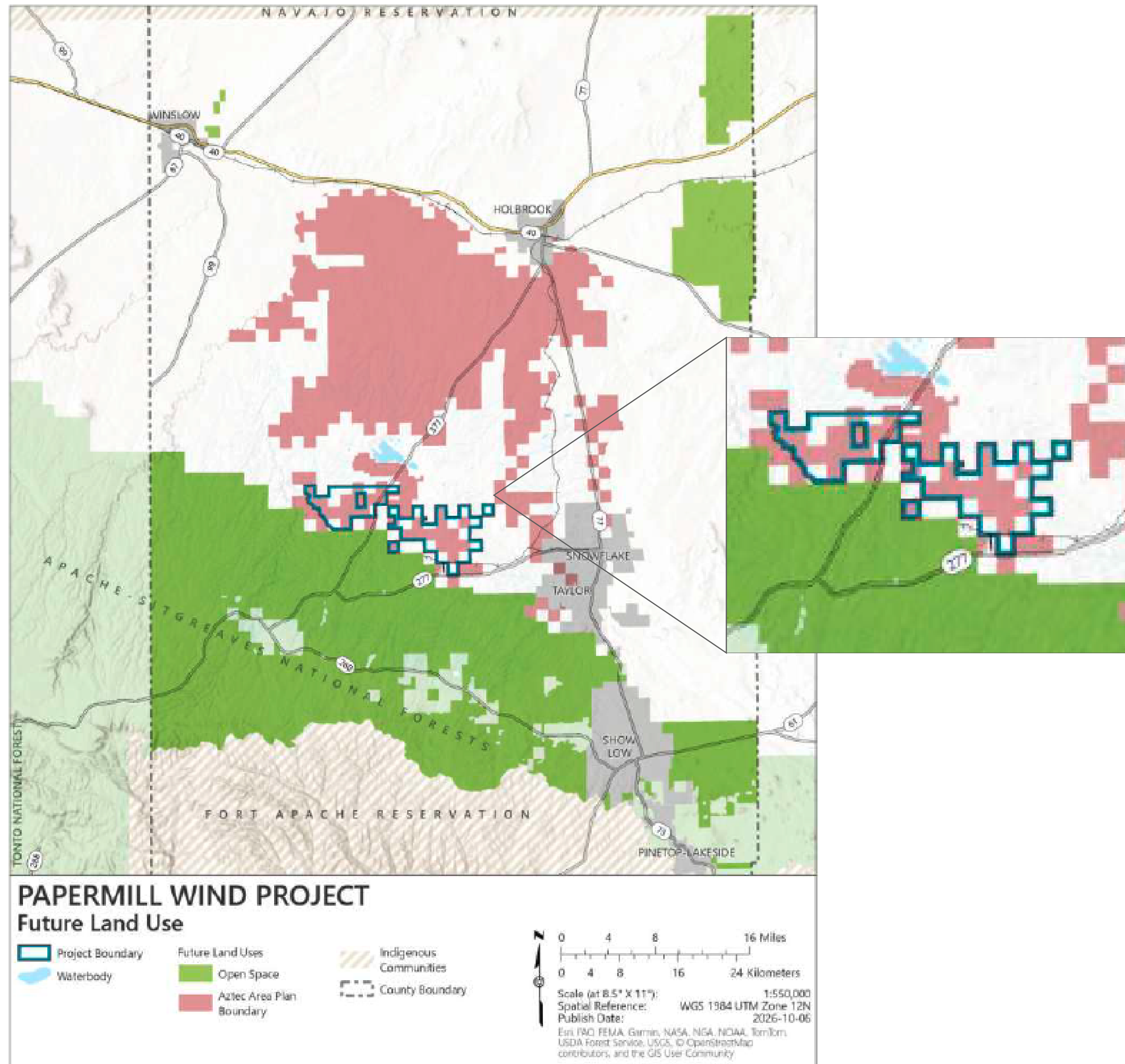


Summary of Concerns Raised

We appreciate the opportunity to respond with the specific context and supporting information or mitigation measures implemented by the Project.

Concern Raised	Papermill Response	Meets Standard / Goal?
Consistency with Land Use Goal #3: Preserve and Protect Open Space	The Project is avoiding impacts to designated open space and conservation areas.	Meets
Consistency with Land Use Policy #16: Increased buffers	The Project exceeds minimum setback requirements	Exceeds
Consistency with Open Space & Recreation Goal #4: Viewsheds and Buffers Around Natural Attractions	The Project avoids major recreational amenities and is sited to reduce visual impacts and preserve dark skies.	Exceeds
Consistency with Environmental Goal #3: Wildfire Risk Near the National Forest	The Project incorporates wildfire prevention measures, emergency response planning and increased setbacks	Meets
Consistency with Energy Policy #9: Proximity to Existing Transmission	The Project was sited near existing transmission infrastructure to minimize new transmission requirements	Exceeds
Consistency with Future Land Use Map: Rural Residential Designation (State Trust Land)	The Project is compatible with the Rural Residential designation	Meets
Consistency with Aztec Area Plan Character Areas	The Project supports the Area Plan's goals	Exceeds
Snowflake General Plan Apache Railroad / SR 277 Growth Areas	The Project is located outside Snowflake's growth areas and will not constrain future development.	Meets

Open Space: Land Use Goal #3

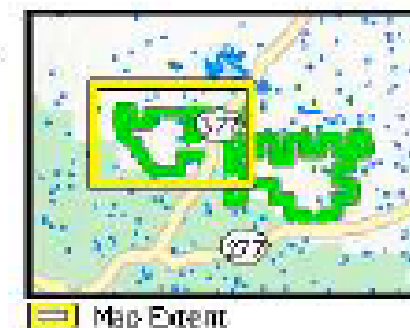


How Papermill Is Addressing the Concern

- ✓ No conflict with five *Open Space and Recreation Goals* and 15 *Open Space and Recreation Policies* in the Comprehensive Plan
- ✓ Less than 5% of Project Area occupied by permanent facilities
- ✓ Ranching remains the primary land use
- ✓ At end of life, the Project will be fully decommissioned per landowner and County requirements, and the land restored to its pre-construction condition.
- ✓ Supports Comprehensive Plan's goal to be a "global leader in renewable energy research and development"



MEETS STANDARD



- ✓ Papermill commits to siting every turbine at least 0.25 mile (1,320 feet) from the ASNF boundary, **exceeding County Ordinance**
- ✓ Avoids unaffected and undisturbed viewsheds
- ✓ Does not occupy Forest Service land, restrict public access, or displace any recreation use, including ASNF
- ✓ Install an Aircraft Detection Lighting System, subject to FAA approval to preserve Northern Arizona's dark sky conditions

✓ **EXCEEDS STANDARD**

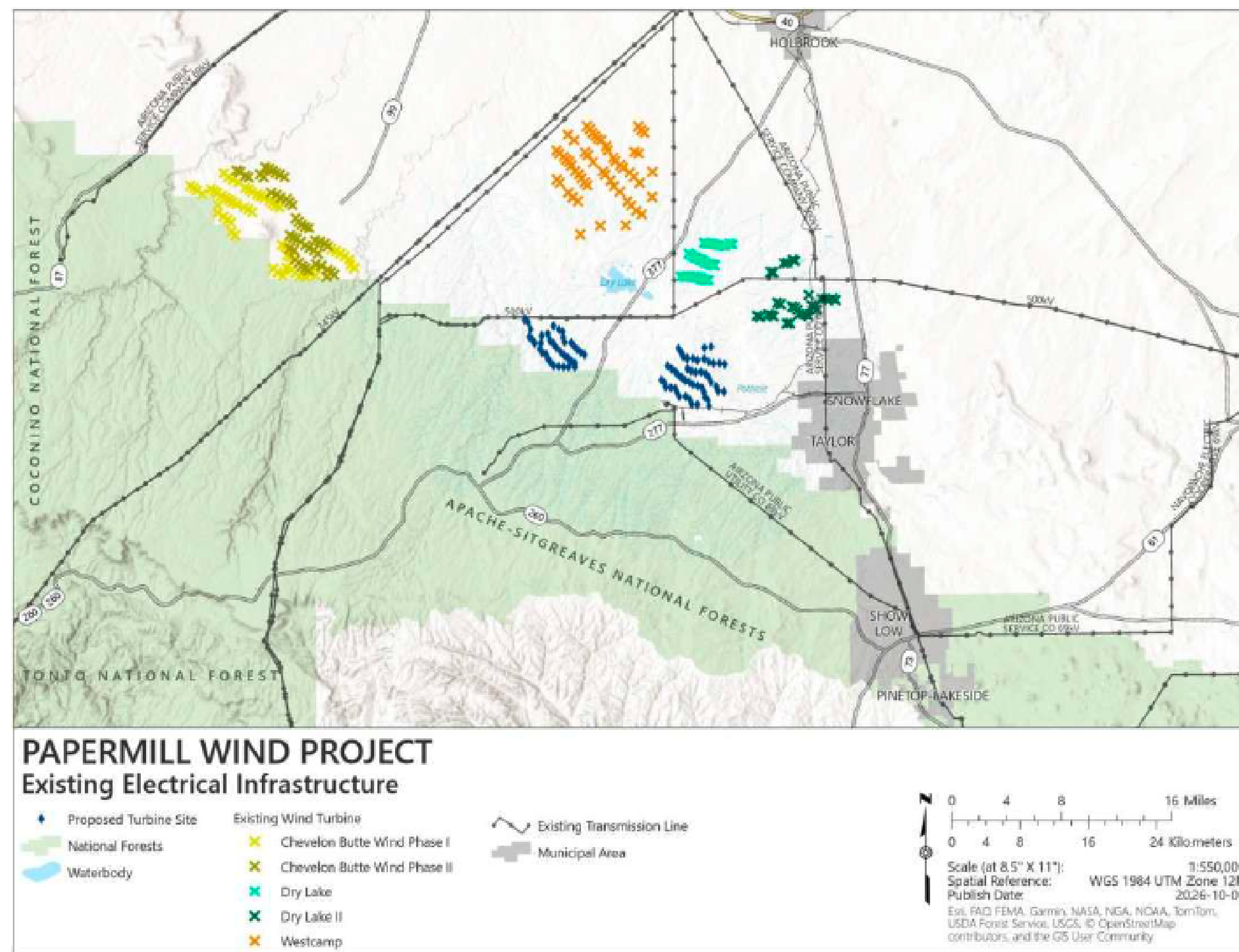
Wildfire Risk – Environmental Goal 3

How Papermill Is Addressing the Concern

- ✓ **Utility-scale wind facilities have a very low incidence of wildfire ignition and are not generally considered a significant source of wildfire risk**
- ✓ Commitment to provide ~30,000-gallon water tank available to local fire departments
- ✓ Emergency Response Plan developed with local emergency service providers and regulatory agencies
- ✓ Complies with all applicable federal, state, and local fire prevention requirements and industry-standard inspection and maintenance
- ✓ The Project has increased the 0.25-mile turbine setback described in Section 2 between turbines and the ASNF boundary.
- ✓ The Project has been designed to meet or exceed the County Ordinance setback requirements at all identified and permitted residential receptors.

✓ **EXCEEDS STANDARD**

Proximity to Existing Transmission – Energy Policy 9

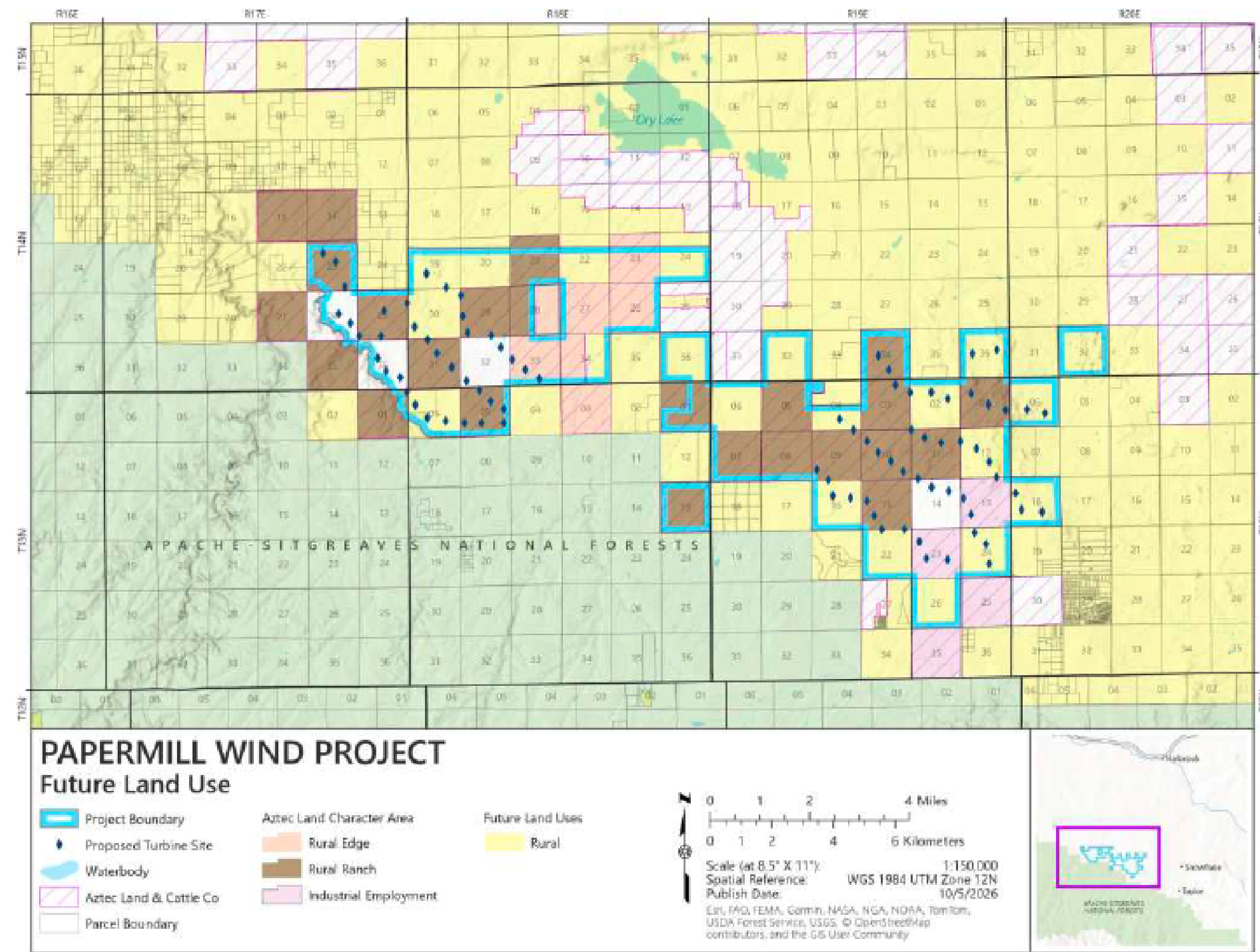


How Papermill Is Addressing the Concern

- ✓ Access to existing infrastructure was a primary factor in selecting this site
- ✓ Two viable interconnection options within a distance range typical for energy facilities

✓ **MEETS STANDARD**

Land Use Compatibility



How Papermill Is Addressing the Concern

- ✓ Rural Residential designation on State Trust Land **does not conflict** with renewable energy, and the Project is consistent with the intent of the designation
- ✓ The Project is not only compatible with the Aztec Area Plan, but it also advances the renewable energy land use opportunity expressly contemplated by the Plan
- ✓ Renewable energy facilities are **eligible for approval under the current zoning framework**

✓ **EXCEEDS STANDARD**

Town of Snowflake Growth Areas

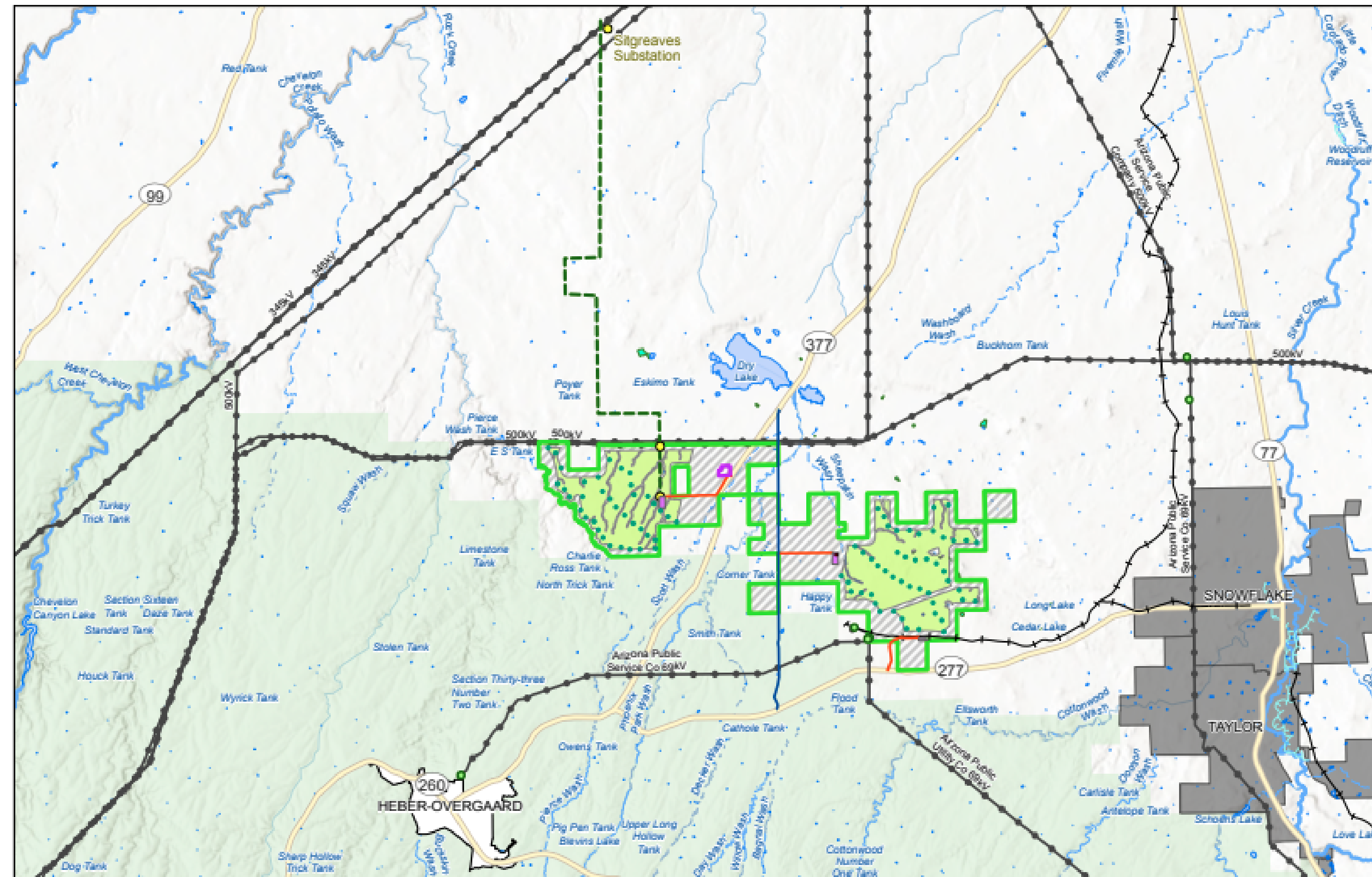


How Papermill Is Addressing the Concern

- ✓ The Project does not overlap, encroach upon, or otherwise interfere with either planned growth area
- ✓ The Project is not in the Town of Snowflake's 2022 General Plan boundaries

✓ **MEETS STANDARD**

Siting Constraints and Preliminary Layout



**Site Plan Vicinity Map
Papermill Wind Project
Sheet G.1**

0 1.25 2.5 5
Miles

Sources: HIFL (2024),
USGS NHD (2022), US Census (2015).



How Papermill Is Addressing the Concern

- ✓ The Project maps reflects a siting process that has been constraint-driven from the start.
- ✓ Papermill has mapped the physical, environmental, land ownership, and community constraints across the Permit Area and applied setbacks to each, which defines where turbines can and cannot be placed.
- ✓ **Substantially increased turbine setback** from the National Forest boundary along the southern Permit Area, exceeding the Ordinance minimum of 1.1× total turbine height
- ✓ **Four (4) proposed turbines excluded from the Permit Area** in the northwest portion of the Project to minimize impacts to local residences

✓ **EXCEEDS STANDARD**

Local Energy, Local Benefits

The Papermill Wind Project complies with all local goals, policies, and land use objectives of Navajo County, and will bring direct local benefit for decades to come.



\$1.5M+ Community Benefit Fund

Direct support for local organizations throughout the project's operations



\$57M+ in Property Taxes

Over the operating life of the project



Up to 170 Construction Jobs and 10 Permanent Operations & Maintenance Jobs



Annual Scholarships

Supporting students in communities where we operate