WHITE MOUNTAIN
ASSOCIATION OF REALTORS®

White Mountain Association of REALTORS®
3320 Kay Rd.
Lakeside, AZ 85929

June 10, 2026

RE: Formal Opposition to the Continued Development of Industrial-Scale Alternative Energy Projects in the White Mountain Region of Arizona

Dear WMAR members:

On behalf of the White Mountain Association of REALTORS®, we write to formally and respectfully convey our opposition to the continued development of industrial-scale alternative energy projects—including, but not limited to, the Lava Run and Black Ridge wind and solar generation projects—across Navajo County, Apache County, and the broader White Mountain region of Arizona.

WMAR represents the real estate professionals who serve the buyers, sellers, property owners, ranchers, small business operators, and second-home families who make the White Mountains one of Arizona's most economically and culturally distinctive regions. Our opposition is not ideological; it is the conclusion of a multi-phase research effort our Association undertook over the past year, including a comprehensive review of utility-scale wind and solar siting, a membership survey, and a detailed review of the specific projects now proposed in our area.

WMAR supports a balanced, diversified national energy strategy and recognizes the legitimate role that renewable generation plays in Arizona's broader energy mix. We are not opposed to renewable energy as a matter of principle. We are, however, opposed to the siting of industrial-scale wind and solar facilities in landscapes – like ours – where the environmental, economic, public-safety, and property-rights costs to existing landowners and communities have not been honestly accounted for, where local control has been diminished, and where the public engagement process has fallen short of what Arizonans should expect; the findings summarized below explain why.

What Our Research Has Shown

1. Measurable, documented impacts on property values and marketability. Our review of peer-reviewed appraisal literature, federal lab studies, and comparable market analyses from Texas, the Upper Midwest, and the Mountain West shows recurring evidence of diminution in value for residential properties located within view of industrial wind facilities, with the most pronounced effects within roughly two miles of turbines. In a region whose real estate market is driven by viewshed, recreation, retirement, and second-home demand, the loss of unobstructed mountain, forest, and dark-sky vistas is not a soft externality – it is a direct hit to assessed value, days-on-market, and lender appetite. WMAR members have already begun fielding questions from buyers under contract who have learned of proposed turbine locations during their due-diligence period.

2. A real and unacceptable wildfire-ignition risk. The White Mountains sit in one of the most fire-prone landscapes in the American Southwest. The 2002 Rodeo-Chediski Fire and the 2011 Wallow Fire both burned through this region and reshaped insurance, lending, and land-use realities for a generation. Industrial wind and solar facilities introduce new high-voltage transmission corridors, substations, inverters, and battery storage systems into forested and grassland fuel beds. Utility infrastructure has been documented as a leading cause of catastrophic wildfire ignition across the West. Layering additional energized infrastructure across this landscape, in our view, materially increases ignition risk to homes, ranches, watersheds, and the National Forest lands that surround our communities. This risk is not adequately captured in current project filings.

3. Wildlife, habitat, and dark-sky harms that the existing review process is not catching. The White Mountain region supports Rocky Mountain elk, Merriam's turkey, bald and golden eagles, the Mexican gray wolf recovery area, the Mexican spotted owl, sensitive raptors, and seasonal bat populations. The footprint of proposed wind facilities overlaps documented raptor movement corridors and high-use bat habitat, and turbine collision mortality for both groups is well-documented in the scientific literature. Industrial solar arrays of the scale being discussed require the wholesale conversion of grassland and piñon-juniper habitat that supports pronghorn, mule deer, and ground-nesting birds. Equally serious for our economy: the White Mountains' dark-sky character is a documented draw for visitors and homebuyers, and lit substations, aviation-warning lights, and security lighting at industrial-scale facilities permanently change that character.

4. Water demands that are inconsistent with our hydrologic reality. Construction-phase water use for dust control, soil compaction, and panel and turbine assembly—and, for some technologies, ongoing operational water use for panel washing—will draw on already-stressed local groundwater systems in the Little Colorado River watershed. WMAR has not seen credible, basin-specific hydrologic analyses accompanying the current project proposals, and our members—many of whom advise rural buyers on well capacity and water adequacy—do not believe the cumulative draw has been honestly modeled.

5. Permanent conversion of working lands and a thin local economic return. Utility-scale wind and solar facilities typically take working ranchland, timberland, or open range out of productive multi-generational use for the 30-to-40-year life of the project and, in practice, well beyond. Local construction employment is real but short-lived; permanent operations employment is modest; and the bulk of revenue and tax benefit flows to out-of-state developers, financiers, and offtakers. Property tax abatements, transferability of credits, and renewable-energy-zone treatment further reduce what local jurisdictions actually receive. The asymmetry—rural Arizona absorbing the land-use, viewshed, wildfire, and infrastructure impacts while urban and out-of-state ratepayers receive the electrons and the developers receive the tax equity—is the central equity problem with the current siting model.

6. Inadequate decommissioning and reclamation assurances. WMAR's review of comparable projects across the West shows a consistent pattern: decommissioning bonds set at the front end are routinely insufficient to cover actual removal, foundation extraction, blade disposal, and full reclamation 25 to 40 years later, particularly as the original developer is often no longer the operating entity. The risk of orphaned infrastructure being left on private and state trust land—and ultimately becoming a county or landowner liability is, in our view, not theoretically remote. It is a near-certainty under the current bonding framework, and it is a permanent encumbrance on real property and on the marketability of every parcel within sight of it.

7. Erosion of local control and inadequate public engagement. Many of the projects now under discussion are being advanced under siting and certification processes that, in practice, preempt or substantially constrain the authority of county boards of supervisors and municipal councils to set meaningful setbacks, height limits, lighting standards, sound limits, and decommissioning bonds. WMAR members, and the communities they represent, report that public meetings have been scheduled with minimal notice, that project footprints have shifted materially between public sessions, and that adjacent landowners frequently learn of proposed turbine or array locations only after lease negotiations with neighboring landowners are well advanced. This is not adequate process for decisions that will durably reshape our region.

What WMAR Is Asking You to Do

Consistent with our research findings and the views expressed by our membership, WMAR respectfully requests that you take the following actions within the scope of your office:

- **Oppose, or formally request the withdrawal of, the Lava Run and Black Ridge projects** as currently sited and configured, pending a full, independent, basin-specific environmental, hydrologic, wildfire, and economic-impact review.
- **Restore and strengthen local land-use authority** by supporting state and county measures that preserve the ability of Navajo and Apache County Boards of Supervisors and affected municipalities to establish enforceable setbacks, height and lighting standards, sound limits, fire-suppression requirements, and full decommissioning bonds.
- **Require full, third-party-verified decommissioning bonds** indexed to actual removal and reclamation costs and reviewed every five years, with the bond held by the county and not assignable to successor developers without recertification.
- **Mandate transparent, in-person public engagement** in each affected community, with no less than 60 days' notice, in-person hearings during evening hours, and project-specific notice mailed to every property owner within a defined radius of any proposed turbine, array, substation, or new transmission corridor.
- **At the federal level,** support a recalibration of the tax credit, transferability, and offtake structures that currently incentivize siting in rural communities that do not consume the resulting electricity, and direct relevant federal land-management and wildlife agencies to require region-specific cumulative-impact analysis—not parcel-by-parcel review—before further large-scale projects are approved in the Mogollon Rim and White Mountain landscapes.

WMAR and its members are prepared to be a constructive resource to your office on these questions. We can make our underlying white papers, the results of our membership survey, and our project-specific analysis available to your staff, and we welcome the opportunity to meet with you, in person or virtually, at your convenience. Decisions made over the next 18 to 24 months will shape the character, economy, and property values of the White Mountain region for the next half-century. The REALTOR® community of Arizona's high country is asking that those decisions be made deliberately, transparently, and with full accounting of the costs that will be borne—permanently—by the people who live here.

Thank you for your service, for your attention to these concerns, and for the opportunity to be heard.

Respectfully,

Brenda Ciminski 2026 President	Bryan Anderson President-Elect	Samantha Whitmire 1st Vice President
Paulina Schubel Treasurer	Charles Tupper Past- President	Jessica Orona Director
JoAnne Guderian Director	Tabetha Hargett Director	Theresa Serna Director
Cory Page Director	Lon Hoffman Director	Jennifer Knaust Director
Erin Durbin Director	Trisha Reid Chief Executive Officer	