

From: [Susan Puzas](#)
To: [Kirschmann, Robert](#)
Cc: kevin.lomeli@douglasaz.gov; operations@col-coop.com; LineExtensions@col-coop.com; pep@azgfd.gov; medelman@azland.gov; [James Gomes](#); apacheelementary@gmail.com; [Brian Jervas](#); [Richard Freije](#); [Reynaldo G. Martinez](#)
Subject: Re: Transmittal SU-19-11 (AT&T Antelope)
Date: Tuesday, December 17, 2019 12:29:41 PM
Attachments: [drainage permit checklist2.pdf](#)
[Encroachment EnviroComplianceCheckSheet.pdf](#)
[Encroachment Application.pdf](#)
[Insurance Requirements-Ench Construction Only.pdf](#)

CAUTION: EXTERNAL EMAIL*

Good afternoon Robert,

AT&T's proposed turnout location in relation to ADOT is SR-80 EB RT at approximate milepost 407.7.

AT&T is proposing a 16' wide gravel access. ADOT's current standard is an asphalt or concrete access 20' wide, from the highway to the ROW fence, with 25' to 30' radii determined by ROW width and posted speed, with a swing gate.

AT&T will need to submit an encroachment permit application along with the following:
Completed application, with AT&T as the encroachment owner, and the paving contractor as the encroachment applicant. An ADOT application is attached.

- 1) An 11x17" Site Plan with location details of the turnout - distances and offsets provided in feet:
 - a) from the edge of pavement or the white edge stripe (indicate on the plan which one) to the ROW/property line
 - b) from the nearest milepost to the proposed centerline of turnout
 - c) type of gate, a Type 1 swinging gate, include the size
 - d) Fencing materials if security fence will replace or connect to ADOT ROW fence
- 2) A Temporary Traffic Control Plan for use while constructing the turnout
- 3) The paving contractors insurance meeting the requirements for encroachment permit, reference the attached Insurance Requirements checklist, the yellow highlight on page 2.
- 4) Complete and sign the attached drainage checklist - Note if any agency requires a drainage study, an approved copy shall be submitted to ADOT
- 5) Complete and sign the attached Environmental Checklist - Note if any agency requires an environmental study or clearance, an approved copy shall be submitted to ADOT

Please disclose if the utility easement is existing with utilities already installed, or if it's only proposed and utilities need to be installed? If the utilities need to be installed the same encroachment application may be shared with the utility company so they can begin the permit process to bring the utilities on site.

As always we appreciate the opportunity to review and comment.

Sincerely, Susan

On Tue, Dec 10, 2019 at 5:32 PM Kirschmann, Robert <RKirschmann@cochise.az.gov> wrote:

Good afternoon,

Please find the transmittal for SU-19-11 (AT&T Antelope) for a 199' tall communication tower in Portal. Comments are due by December 23, 2019.



December 23, 2019

Robert Kirschmann
Cochise County Community Development
Development Services Department
1415 Melody Lane, Building E
Bisbee, Arizona 85603

Re: Review of the SU-19-11 (AT&T Antelope) telecommunications project

Dear Mr. Kirschmann:

The Arizona Game and Fish Department (Department) reviewed your Project Evaluation Request dated December 17, 2019, regarding the construction of a new 99-foot telecommunication tower and related equipment near Portal, in Cochise County, Arizona. As seen on the Department's Heritage Data Management System (HDMS)'s Online Environmental Tool report created for you on December 23, 2019, special status species such as Texas horned lizard (*Phrynosoma cornutum*) and desert box turtle (*Terrapene ornata luteola*) have been reported within a two mile radius of your proposed project.

Based on the information provided, the Department offers the following general recommendations:

- Minimize impacts to vegetation during project construction. Staging areas should be located in previously disturbed sites, and kept as small as possible. Implement erosion and drainage control measures during the project to prevent the introduction of sediment-laden runoff into adjacent surface waters, and to prevent impacts to surface water quality. Stabilize exposed soils, particularly on slopes, with native vegetation as soon as possible to prevent excess erosion.
- Minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects and pathogens. Precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. To view a list of documented invasive species in or near your project area visit <http://login.imapinvasives.org/azimi/login/?next=/azimi/>. To build a list: login, go to Query and Reports, select a geography value relevant to your project area, and select "View Report" for a list of reported species.
 - Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245); please see the Arizona Department of Agriculture website for prohibited and restricted noxious weeds.
<https://agriculture.az.gov/pests-pest-control/agriculture-pests/noxious-weeds>
<https://plants.usda.gov/java/noxious?rptType=State&statefips=04>

azgfd.gov | 602.942.3000

5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN, ERIC S. SPARKS, TUCSON | KURT R. DAVIS, PHOENIX
LELAND S. "BILL" BRAKE, ELGIN | JAMES E. GOUGHNOUR, PAYSON | JAMES S. ZIELER, ST. JOHNS DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY

Robert Kirschmann

December 23, 2019

Page 2

- If trenching will occur, trenching and backfilling crews should be close together to minimize the amount of open trenches at any given time. Avoid leaving trenches open overnight. Where trenches cannot be back-filled immediately, escape ramps should be constructed at least every 90 meters. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The slope should be less than 45 degrees (1:1). Trenches that have been left open overnight should be inspected and animals removed prior to backfilling.
- If special status reptile species, including Texas horned lizard and desert box turtle, are encountered during project activities, construction crews should refer to the *Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects* to relocate species outside of the immediate project footprint.
<https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/2014%20Tortoise%20handling%20guidelines.pdf>

The Department appreciates the opportunity to provide an evaluation of impacts to wildlife or wildlife habitats associated with the SU-19-11 (AT&T Antelope) telecommunications project. If you have any questions regarding this letter, please contact me at (623) 236-7615, and visit our website for additional guidelines at:

<https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Sincerely,



Cheri A. Bouchér
Project Evaluation Program Specialist, Habitat Branch
Arizona Game and Fish Department

cc: Ginger Ritter, Project Evaluation Program Supervisor
John Windes, Habitat Program Manager, Region V

AGFD# M19-12115526

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

AT&T Antelope SU-19-11

Project Description:

199' self supporting tower and associated facilities

Project Type:

Communication, Cell or communication tower including access roads, New tower

Contact Person:

Cheri Boucher

Organization:

Arizona Game and Fish Department

On Behalf Of:

PRIVATE

Project ID:

HGIS-10240

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:

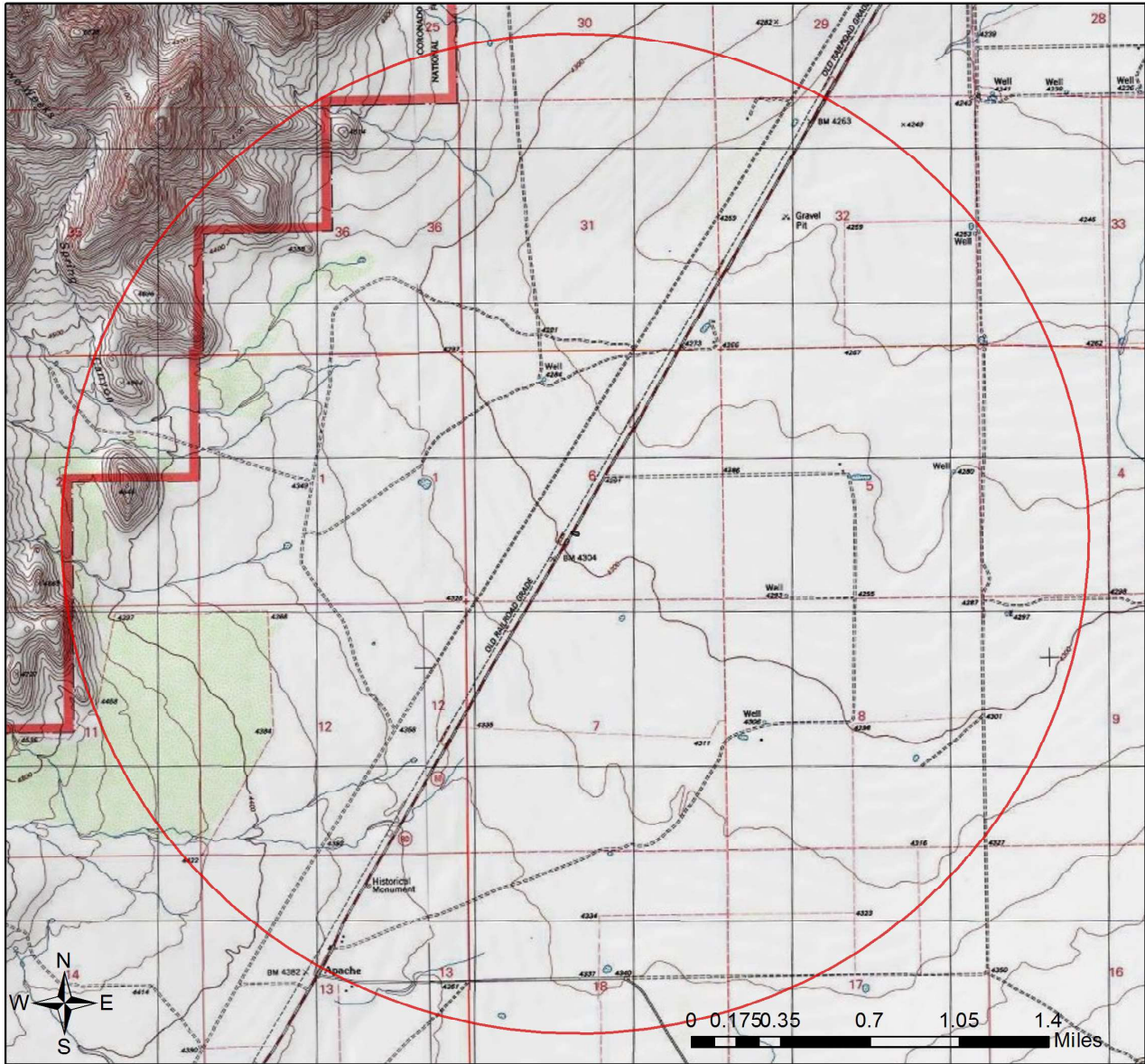
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366
Or
PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

AT&T Antelope SU-19-11

USA Topo Basemap With Locator Map



- Project Boundary
- Buffered Project Boundary

Project Size (acres): 0.20

Lat/Long (DD): 31.7160 / -109.1148

County(s): Cochise

AGFD Region(s): Tucson

Township/Range(s): T20S, R32E

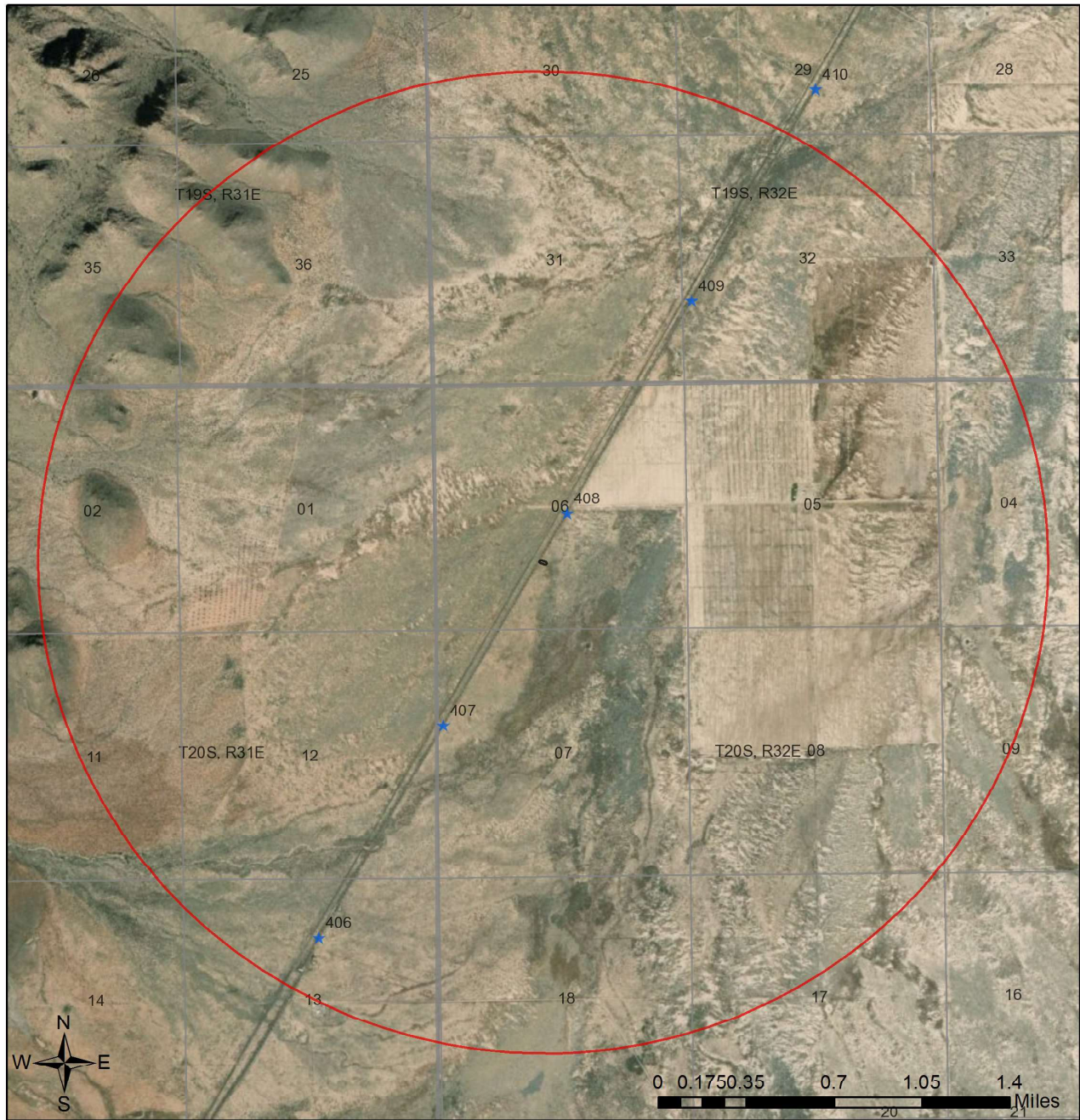
USGS Quad(s): SKULL CANYON

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap



AT&T Antelope SU-19-11

Web Map As Submitted By User

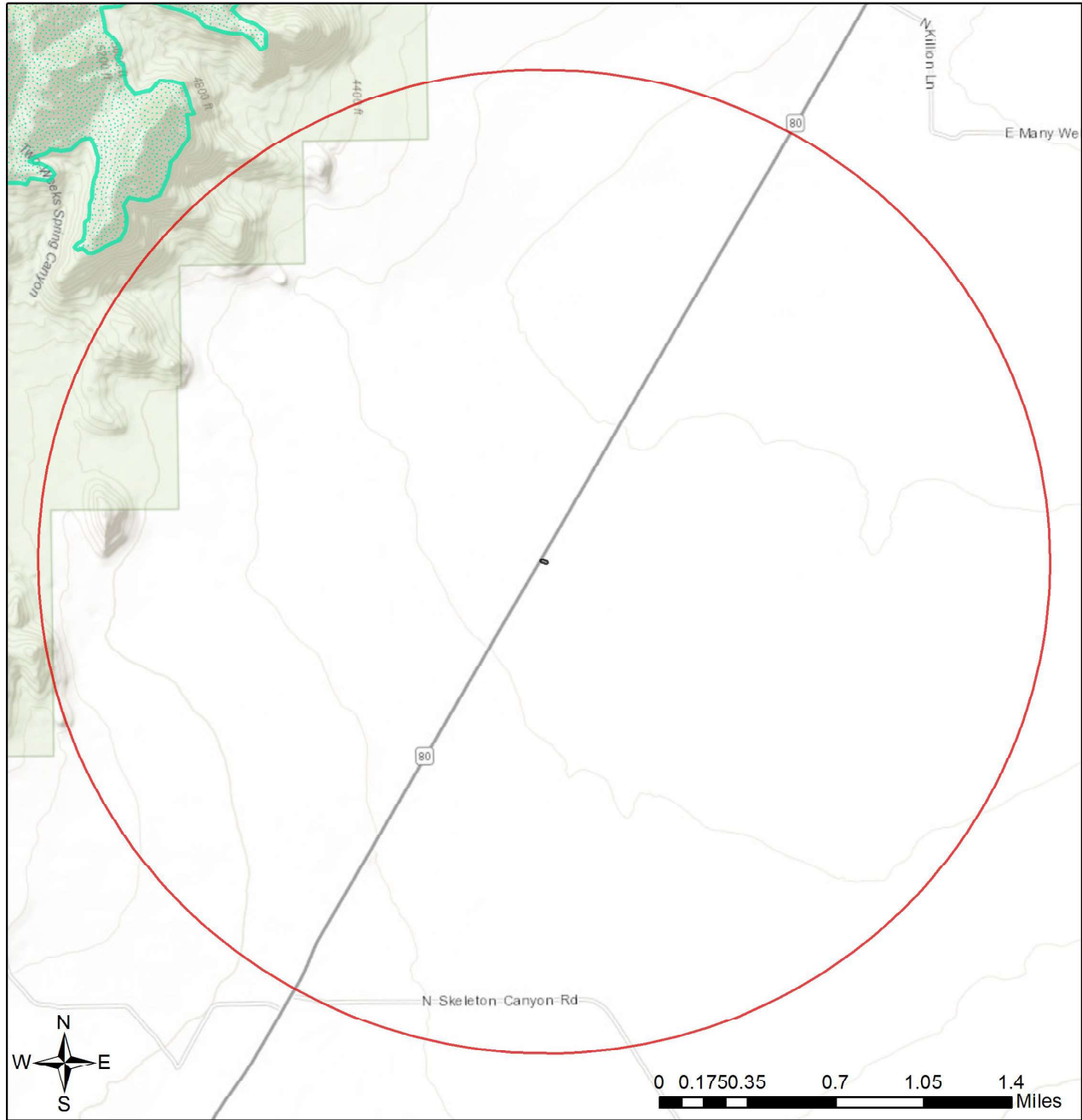


- Project Boundary
- Buffered Project Boundary
- Milepost
- Sections
- Townships

Project Size (acres): 0.20
Lat/Long (DD): 31.7160 / -109.1148
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T20S, R32E
USGS Quad(s): SKULL CANYON

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA,
USGS, AeroGRID, IGN, and the GIS User Community

AT&T Antelope SU-19-11 Important Areas

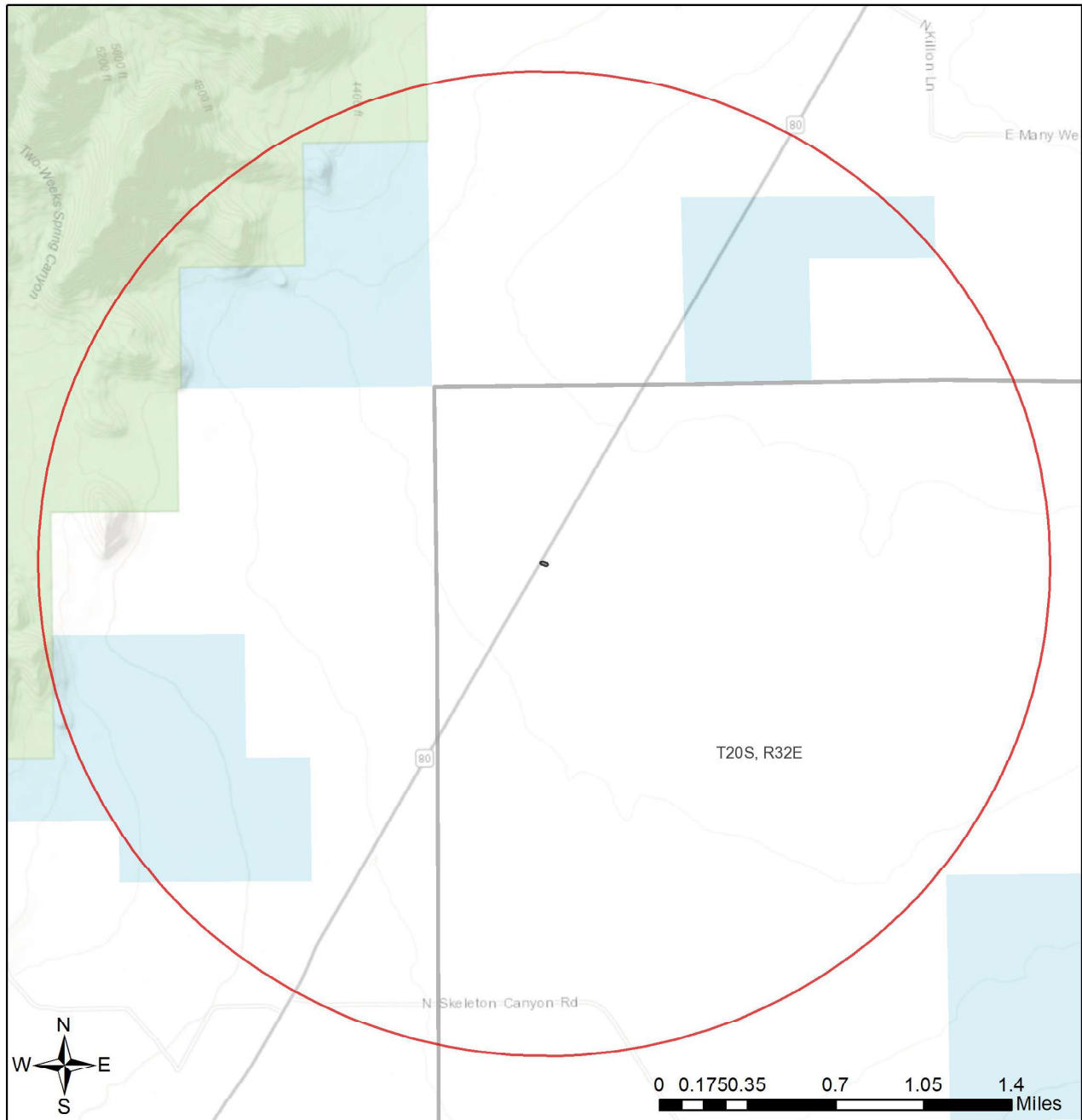


- | | | |
|--------------------------------------|--|---|
| Project Boundary | Wildlife Movement Area - Riparian/Wash | Project Size (acres): 0.20
Lat/Long (DD): 31.7160 / -109.1148
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T20S, R32E
USGS Quad(s): SKULL CANYON |
| Buffered Project Boundary | Wildlife Connectivity | |
| County Stakeholder Assessment | | |
| Wildlife Crossing Area | Important Connectivity Zones | |
| Wildlife Movement Area - Diffuse | Pinal County Riparian | |
| Wildlife Movement Area - Landscape | Critical Habitat | |
| | Important Bird Areas | |

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

AT&T Antelope SU-19-11

Township/Ranges and Land Ownership



- | | |
|---------------------------|------------------------|
| Project Boundary | Military |
| Buffered Project Boundary | Mixed/Other |
| Township/Ranges | National Park/Mon. |
| Land Ownership | |
| AZ Game & Fish Dept. | State & Regional Parks |
| BLM | State Trust |
| BOR | US Forest Service |
| Indian Res. | Wildlife Area/Refuge |

Project Size (acres): 0.20
 Lat/Long (DD): 31.7160 / -109.1148
 County(s): Cochise
 AGFD Region(s): Tucson
 Township/Range(s): T20S, R32E
 USGS Quad(s): SKULL CANYON

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Aquila chrysaetos</i>	Golden Eagle	BGA		S		1B
<i>Phrynosoma cornutum</i>	Texas Horned Lizard	SC				
<i>Terrapene ornata luteola</i>	Desert Box Turtle			S		1A

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

No Special Areas Detected

No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted within the Project Vicinity based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Ammodramus savannarum ammolegus</i>	Arizona grasshopper sparrow		S	S		1B
<i>Ammodramus savannarum perpallidus</i>	Western Grasshopper Sparrow					1B
<i>Ammospermophilus harrisi</i>	Harris' Antelope Squirrel					1B
<i>Anthus spragueii</i>	Sprague's Pipit	SC				1A
<i>Antilocapra americana americana</i>	American Pronghorn					1B
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl	SC	S	S		1B
<i>Buteo regalis</i>	Ferruginous Hawk	SC		S		1B
<i>Buteo swainsoni</i>	Swainson's Hawk					1C
<i>Callipepla squamata</i>	Scaled Quail					1C
<i>Chordeiles minor</i>	Common Nighthawk					1B
<i>Coluber bilineatus</i>	Sonoran Whipsnake					1B
<i>Corynorhinus townsendii pallescens</i>	Pale Townsend's Big-eared Bat	SC	S	S		1B
<i>Crotalus lepidus</i>	Rock Rattlesnake					1A
<i>Cynanthus latirostris</i>	Broad-billed Hummingbird		S			1B
<i>Cynomys ludovicianus</i>	Black-tailed Prairie Dog	CCA		S		1A
<i>Dipodomys spectabilis</i>	Banner-tailed Kangaroo Rat			S		1B
<i>Euderma maculatum</i>	Spotted Bat	SC	S	S		1B
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat	SC		S		1B
<i>Heloderma suspectum</i>	Gila Monster					1A
<i>Hypsiglena sp. nov.</i>	Hooded Nightsnake					1B
<i>Incilius alvarius</i>	Sonoran Desert Toad					1B
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			1B
<i>Leptonycteris yerbabuenae</i>	Lesser Long-nosed Bat	SC				1A
<i>Lepus alleni</i>	Antelope Jackrabbit					1B
<i>Melospiza lincolni</i>	Lincoln's Sparrow					1B
<i>Microtus mexicanus</i>	Mexican Vole					1B
<i>Micruroides euryxanthus</i>	Sonoran Coralsnake					1B

Species of Greatest Conservation Need Predicted within the Project Vicinity based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Myotis occultus</i>	Arizona Myotis	SC		S		1B
<i>Myotis velifer</i>	Cave Myotis	SC		S		1B
<i>Myotis yumanensis</i>	Yuma Myotis	SC				1B
<i>Notiosorex cockrumi</i>	Cockrum's Desert Shrew					1B
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat					1B
<i>Oreoscoptes montanus</i>	Sage Thrasher					1C
<i>Oreothlypis luciae</i>	Lucy's Warbler					1C
<i>Panthera onca</i>	Jaguar	LE				1A
<i>Passerculus sandwichensis</i>	Savannah Sparrow					1B
<i>Peromyscus nasutus</i>	Northern Rock Deermouse					1B
<i>Peucaea botterii arizonae</i>	Arizona Botteri's Sparrow			S		1B
<i>Phrynosoma solare</i>	Regal Horned Lizard					1B
<i>Senticolis triaspis</i>	Green Ratsnake		S			1B
<i>Spizella breweri</i>	Brewer's Sparrow					1C
<i>Sturnella magna</i>	Eastern Meadowlark					1C
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					1B
<i>Terrapene ornata</i>	Ornate Box Turtle					1A
<i>Vireo bellii arizonae</i>	Arizona Bell's Vireo					1B
<i>Vulpes macrotis</i>	Kit Fox	No Status				1B

Species of Economic and Recreation Importance Predicted within the Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Callipepla gambelii</i>	Gambel's Quail					
<i>Callipepla squamata</i>	Scaled Quail					1C
<i>Odocoileus hemionus</i>	Mule Deer					
<i>Patagioenas fasciata</i>	Band-tailed Pigeon					1C
<i>Pecari tajacu</i>	Javelina					
<i>Puma concolor</i>	Mountain Lion					
<i>Zenaida asiatica</i>	White-winged Dove					
<i>Zenaida macroura</i>	Mourning Dove					

Project Type: Communication, Cell or communication tower including access roads, New tower

Project Type Recommendations:

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.

Consider tower designs and/or modifications that reduce or eliminate impacts to migratory birds (i.e. free standing, minimally lighted structures).

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information <https://www.azgfd.com/hunting/regulations>.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Based on the project type entered, coordination with U.S. Fish and Wildlife Service (Migratory Bird Treaty Act) may be required (<http://www.fws.gov/southwest/es/arizona/>).

Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

Project Location and/or Species Recommendations:

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <http://www.fws.gov/southwest/es/arizona/> or:

Phoenix Main Office
9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

From: [Roberts, Christine](#)
To: [Kirschmann, Robert](#)
Subject: RE: Transmittal SU-19-11 (AT&T Antelope)
Date: Wednesday, December 11, 2019 8:37:36 AM

Good morning, Robert,

I do not have any concerns from a legal perspective.

Best regards,

Christine J. Roberts, Esq., M.B.A.

Civil Deputy County Attorney

Cochise County Attorney's Office

Civil Division

100 Higgins Hill

P.O. Drawer CA

Bisbee, Arizona 85603

(520) 432-8754 Direct

(520) 432-8700 Main

(520) 432-8778 Fax

CRoberts@cochise.az.gov

Public Programs . . . Personal Service

www.cochise.az.gov

From: Kirschmann, Robert <RKirschmann@cochise.az.gov>

Sent: Tuesday, December 10, 2019 5:25 PM

To: Solis, Joaquin <JSolis@cochise.az.gov>; Simmons, Bradley A <bsimmons@cochise.az.gov>; Garcia, Teresa M <TGarcia@cochise.az.gov>; Murphy, Teresa <TMurphy@cochise.az.gov>; Cratsenburg, Diane E <dcratsenburg@cochise.az.gov>; Esparza, Paul <PEsparza@cochise.az.gov>; Roberts, Christine <CRoberts@cochise.az.gov>; Capas, Carol <CCapas@cochise.az.gov>; Pregler, Lola R <LPregler@cochise.az.gov>

Cc: BOS-Supervisors <BOSSupervisors@cochise.az.gov>

Subject: Transmittal SU-19-11 (AT&T Antelope)

Good afternoon,

Please find the transmittal for SU-19-11 (AT&T Antelope) for a 199' tall communication tower in Portal. Comments are due by December 23, 2019.

The SharePoint can be found here:

<https://cochise.sharepoint.com/:f:/s/development-services/CommercialDRT/EuDIzfA1-0dMhXGi0OabgfgB2FKkmidzE77wMnYpZKyM8Q>

Thank you,

Robert Kirschmann

Planner II

Cochise County Community Development

Development Services Department

1415 Melody Lane, Building E

Bisbee, AZ 85603

520-432-9248

520-432-9278 fax

Public Programs...Personal Service

www.cochise.az.gov