



August 20, 2020

Mr. Robert Kirschmann, Planner II
Cochise County Planning, Zoning and Building Safety
1415 Melody Lane, Building E
Bisbee, Arizona 85603

Submitted electronically via: planningandzoning@cochise.az.gov

RE: SSVEC Solar Project

Dear Mr. Kirschmann:

The Arizona Game and Fish Department (Department) has reviewed the Special Use Project Application, SU-20-10-(SSVEC Solar), submitted to Cochise County for a proposed solar facility. Sulphur Springs Valley Electric Cooperative, Inc, the Project Applicant, is proposing the construction and operation of a solar power generation facility consisting of photovoltaic (PV) solar modules and a small substation. The project site would be located on approximately 160 acres of land in the Sulphur Valley north of Wilcox, in Cochise County, Arizona.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities for management of the state's fish and wildlife resources. It is the mission of the Department to conserve Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. Similarly, the Department recognizes the importance of planning efforts that contribute to regional and the state's economic growth needs and opportunities to develop renewable energy locations. The Department recognizes that with appropriate coordination, proper planning, and voluntary implementation of best management practices can avoid, minimize or mitigate potential impacts to wildlife habitat and populations. Thus, the Department provides the following information for consideration to facilitate developing this economically-important facility while minimizing any impacts to wildlife during development and operation of the facility:

1. If reptile species are encountered during construction of the facility, it would be beneficial to move them outside the project area within one mile of its original location. A scientific collecting permit is required for handling live wildlife. A permit can be obtained by emailing Scpermit@azgfd.gov for more information. If wildlife will need to be removed from the facility once it is operational, annual renewal of the permit should be performed. Additionally, please share wildlife related mortalities from facility operation(s) with Andrew Cavalcant, the Department's Energy Lead (contact info in closing paragraph).

azgfd.gov | 602.942.3000

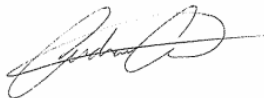
5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

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

2. Artificial night lighting, which may be intensified by the collection mirrors, may attract insects and the species that prey on them (e.g. bats). It could also impair the ability of nocturnal animals to navigate. The Department recommends using only the minimum amount of light needed for safety. If feasible, narrow spectrum bulbs are wildlife-friendly and should be used as often as possible to minimize the number of species affected by lighting. It is also beneficial that all lighting is shielded, canted, or cut to minimize the amount of upward shining light.
3. Birds of prey such as raptors, owls, vultures, and golden or bald eagles are vulnerable to electrocution or powerline strikes during construction and operation. There are a number of design features that can minimize these impacts to these important species. Tuk Jacobson is the Department's raptor expert and will be willing to share information on best management practices; he can be contacted at KJacobson@azgfd.gov or 623-236-7575.
4. Power poles can serve as perches for many birds of prey and there are design features for structures that can also reduce impacts to these important species. Another possible alternative to reduce mortality is using bird flight diverters to decrease avian mortalities. Again, Mr. Jacobson has high expertise in all of the best management practices and would be available to share his knowledge in the pre-design phase of this project.

Thank you for the opportunity to provide thoughts on this proposed project. The Department looks forward to continued communications with the county and the applicant regarding project development and implementation to assist the applicant in avoiding, minimizing, or mitigating potential impacts to wildlife. Please contact me at 623-236-7222 or ACavalcant@azgfd.gov if you have any questions, or would like to further discuss our concerns and recommendations.

Sincerely,



Andrew Cavalcant
Project Evaluation Project Specialist, Habitat Branch

Cc Ginger Ritter, Project Evaluation Program Supervisor AGFD (gitter@azgfd.gov)
John Windes, Habitat Program Manager, Region V AGFD (jwindes@azgfd.gov)

AGFD #M20-08125239

Floodplain: Comments 8/24/20 SB

There are no requirements from the Floodplain Division for a Special Use Permit. However, should this request become an application for development then the following requirements will apply:

1. These parcels are located within FEMA Zones "A" and "AO-2". Therefore, a Floodplain Use Permit is required.
2. Since more than one-acre of land is being disturbed, a drainage analysis will be required. This report shall be certified by an Arizona Registered Professional Civil Engineer. Refer to Section 10, Appendix A of the Cochise County Floodplain Regulations, 12/15/2015 for report requirements.
3. All appropriate requirements in Section 5-Provisions for Flood Hazard Reduction (Cochise County Floodplain Regulations) shall apply.
4. A Grading Plan must be submitted for review and approval, as well as detailed Drainage Improvement Plans.
5. All appropriate state and federal permits are required prior to construction. This includes, but not limited to, Arizona Native Plant Removal Permit, Arizona Department of Environmental Quality Permits, etc.
6. In accordance with Arizona's Stormwater Construction General Permit (CGP-2013), Part 6.1, an operator is to develop a Stormwater Pollution Prevention Plan (SWPPP), before submitting the Notice of Intent (NOI), for permit coverage and prior to conducting any construction activity. Smart NOI's submitted to AZDEQ can be submitted online. Contact AZDEQ for more information: <https://www.azdeq.gov/environ/water/permits/cgp.htmlb>
7. Please note that Cochise County will provide cursory observations of the Stormwater Pollution Prevention Plan, however all requirements and enforcements are regulated by ADEQ.
8. The SWPPP must include an approved Notice of Intent (NOI), which is obtained from the Arizona Department of Environmental Quality (AZDEQ) to be covered under the Arizona Pollution Discharge Elimination System (AZPDES) Construction General Permit (CGP).
9. The approved NOI must be submitted to Cochise County prior to construction start-up.
10. When these items are provided, then the review will continue.

From: [Ruth Bigelow](#)
To: [Kirschmann, Robert](#)
Subject: RE: Transmittal for SU 20-10 (SSVEC Solar)
Date: Wednesday, August 12, 2020 9:01:20 AM
Attachments: [image001.png](#)

CAUTION: EXTERNAL EMAIL*

Robert,

SSVEC has no comments/conditions to submit for this special use permit request.

If you have any questions concerning this review please contact me at 520-384-5513 or rbigelow@ssvec.com

Ruth Bigelow
Lead Line Extension ROW Agent
[Sulphur Springs Valley Electric Cooperative](#)
(520) 384-5513

From: Kirschmann, Robert <RKirschmann@cochise.az.gov>
Sent: Wednesday, August 12, 2020 8:17 AM
To: Ruth Bigelow <rbigelow@ssvec.com>; pep@azgfd.gov; Travis Taylor <Taylor.Travis@azdeq.gov>; medelman@azland.gov; Richard B. Obenshain <rbobenshain@azwater.gov>
Subject: FW: Transmittal for SU 20-10 (SSVEC Solar)

[CAUTION] This email originated from outside of SSVEC. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Attached please find a transmittal, application, radius map and site plans for a proposed solar farm near Willcox. The notification radius is proposed at 1,000 feet.

If you have any questions, please let me know.

Best regards,

Robert Kirschmann
Planner II
Cochise County Community Development
Development Services Department

From: [McGee, Michael S](#)
To: [Kirschmann, Robert](#)
Subject: RE: Transmittal for SU 20-10 (SSVEC Solar)
Date: Wednesday, August 12, 2020 9:05:43 AM
Attachments: [image003.png](#)
[image001.png](#)

Robert,

Environmental Health has no concerns with this proposal at this time.

Michael McGee
EHS III
Environmental Health Division
Cochise Health & Social Services
126 W. 5th St.
Benson, AZ 85602
520-586-8206

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From: Kirschmann, Robert <RKirschmann@cochise.az.gov>
Sent: Wednesday, August 12, 2020 8:00 AM
To: Solis, Joaquin <JSolis@cochise.az.gov>; Simmons, Bradley A <bsimmons@cochise.az.gov>; Watkins, Jackie <JWatkins@cochise.az.gov>; Brady, Shon <SBrady@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>; McGee, Michael S <MMcGee@cochise.az.gov>; Capas, Carol <CCapas@cochise.az.gov>
Cc: BOS-Supervisors <BOSSupervisors@cochise.az.gov>; Coxworth, Daniel <dcoxworth@cochise.az.gov>
Subject: Transmittal for SU 20-10 (SSVEC Solar)

Good morning,

Attached please find a transmittal, application, radius map and site plans for a proposed solar farm near Willcox. The notification radius is proposed at 1,000 feet. The SharePoint can be found [here](#).

If you have any questions, please let me know.

Best regards,

Robert Kirschmann

Planner II

Cochise County Community Development

Development Services Department

126 West 5th Street, Suite 4

Benson, AZ 85602

520-432-9248

520-432-9278 fax



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