



Cochise County

Development Services

Planning, Zoning and Building Safety Division

Public Programs...Personal Service
www.cochise.az.gov

MEMORANDUM

TO: Cochise County Planning and Zoning Commission
FROM: Christine McLachlan, AICP, Planner II
FOR: Daniel Coxworth, AICP, Development Services Director
SUBJECT: Docket SU-20-17 & Z-20-14 (Bella Vista Solar) Agency Comments Summary
DATE: January 5, 2021 for the January 13, 2021 Meeting

AGENCY COMMENTS DOCKET SU-20-17 & Z-20-14 (Bella Vista Solar)

On Monday November 9, 2020, the Development Review Team for the County was transmitted case information for their review. Reviewers were given until Monday November 30, 2020 to respond and were notified that a failure to respond by that date would result in an automatic approval by their agency/Department. Following the December 9, 2021 tabling of the docket, Fort Huachuca was re-transmitted the docket. The response of that agency response, dated 1/4/21, is included as an attachment.

The following is a summation of all the comments that were received by that date.

Cochise County, Floodplain: There are no comments for the Rezoning and Special Use Permit. However, at a minimum, the following items will be required should the project go forward:

The proposed parcel is located within FEMA Zone X. Therefore, a Floodplain Use Permit will not be required.

Prior to start-up of construction:

- A Stormwater Pollution Prevention Plan (SWPPP) will be required from the Arizona Department of Environmental Quality (ADEQ). This will also include a Notice of Intent (NOI) to clear land. A copy of the NOI must be submitted to Cochise County. For more information, please contact: <https://azdeq.gov/AZPDES/CGP>
- A Notice to Clear Native Plants must be obtained from the Arizona Department of Agriculture and a copy submitted to Cochise County. For more information, please contact: <https://agriculture.az.gov/plantsproduce/native-plants>
- A Drainage Analysis will be required for both parcels. This includes, but not limited to, Grading Plans, Site Plans, Drainage Reports prepared by an Arizona Registered Civil Engineer, etc. Please contact the Cochise County Engineering and Natural Resources Department for a copy of the Floodplain Regulations for Cochise County (December 2015).
https://www.cochise.az.gov/sites/default/files/highway_and_floodplain/FLOOD_REGS_2015.pdf

Cochise County ROW: Further right-of-way dedication is not required for Charleston Road at this time, however a complete site plan showing the proposed access needs to be submitted to right-of-way for review prior to the issuance of a permit.

Planning, Zoning and Building Safety

1415 Melody Lane, Building F
Bisbee, Arizona 85603
520-432-9300
520-432-9278 fax
1-877-777-7958
planningandzoning@cochise.az.gov

Cochise County Engineering: No comments received.

Cochise County Building: No comments received.

Cochise County Attorney's Office: No comments received.

Cochise County Environmental Health: No wastewater generated, EH has no concerns

Fry Fire District: The Fry Fire District has the following concerns:

- IFC 505.1: Address numbers shall be installed which are easily legible from Charleston Rd.
- IFC: 503.2.1 and 503.4: Fire Apparatus Access: Access Roads shall be unobstructed, with minimum dimensions of 20' wide and 13' 6" high.
- The Fry Fire District is requesting training to be provided to our personnel during construction and post construction addressing potential issues.

Cochise County Sheriff's Office: No comments received.

Sulfur Springs Valley Electric Cooperative: SSVEC has no comments to submit for this special use permit – rezoning request.

Southwest Gas: No comments received.

City of Sierra Vista: No comments received.

Arizona Game and Fish: See attached.

National Resources Defense Council: No comments received.

Arizona Department of Environmental Quality: No comments received.

State Lands Department: No comments received.

Arizona Department of Water Resources: No comments received.

U.S. Fish and Wildlife Service: See attached.

Federal Aviation Administration: See attached

Fort Huachuca: No issues or concerns (amended 1/4/21) see attached.



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2020-AWP-9154-OE

Issued Date: 09/01/2020

Derek Fromm
GREENSTONE CAPITAL
13951 N Scottsdale Rd, Ste 133
Scottsdale, AZ 85254

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Solar Panel Bella Vista Solar
Location: Sierra Vista, AZ
Latitude: 31-34-09.11N NAD 83
Longitude: 110-12-12.54W
Heights: 4270 feet site elevation (SE)
8 feet above ground level (AGL)
4278 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 L Change 2.

This determination expires on 03/01/2022 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

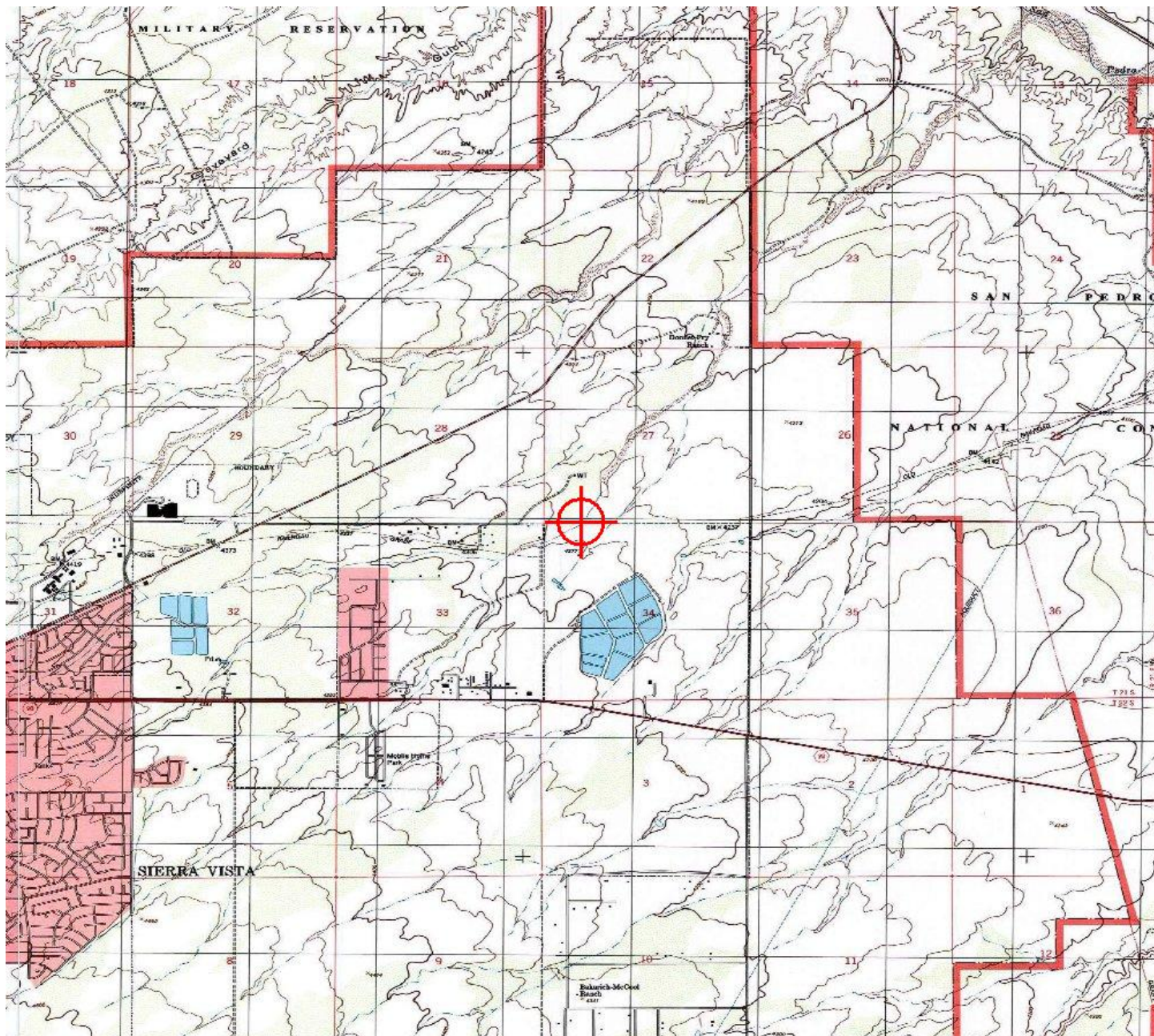
If we can be of further assistance, please contact our office at (206) 231-2990, or paul.holmquist@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2020-AWP-9154-OE.

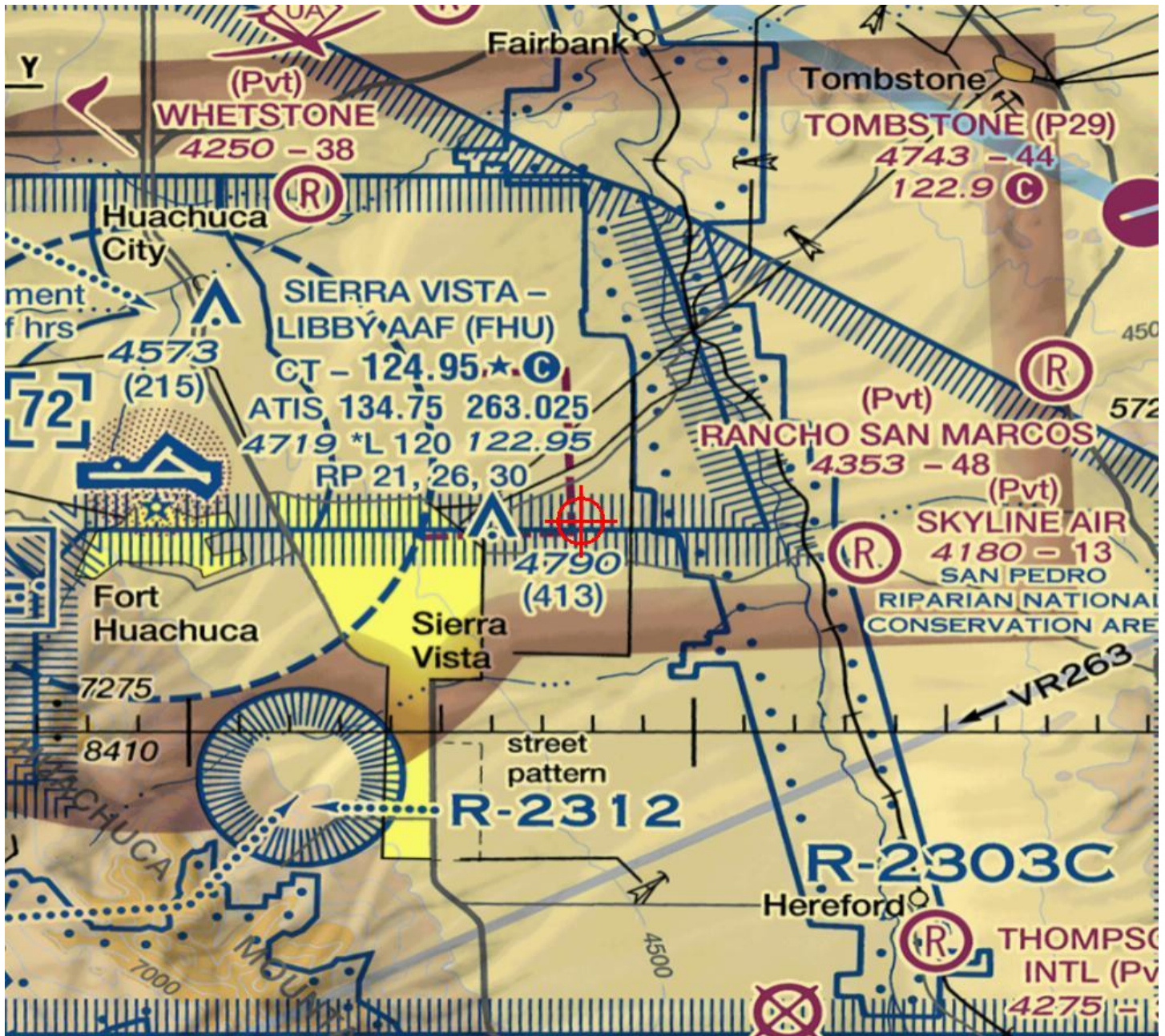
Signature Control No: 447738976-449900812

(DNE)

Paul Holmquist
Specialist

Attachment(s)
Map(s)





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:

Greenstone Bella Vista Solar

Project Description:

20 MWac Solar PV Plant - Bella Vista, Cochise County, AZ

Project Type:

Energy Storage/Production/Transfer, Energy Production (generation), photovoltaic solar facility (new)

Contact Person:

Derek Fromm

Organization:

GREENSTONE CAPITAL

On Behalf Of:

AZGFD

Project ID:

HGIS-11761

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.

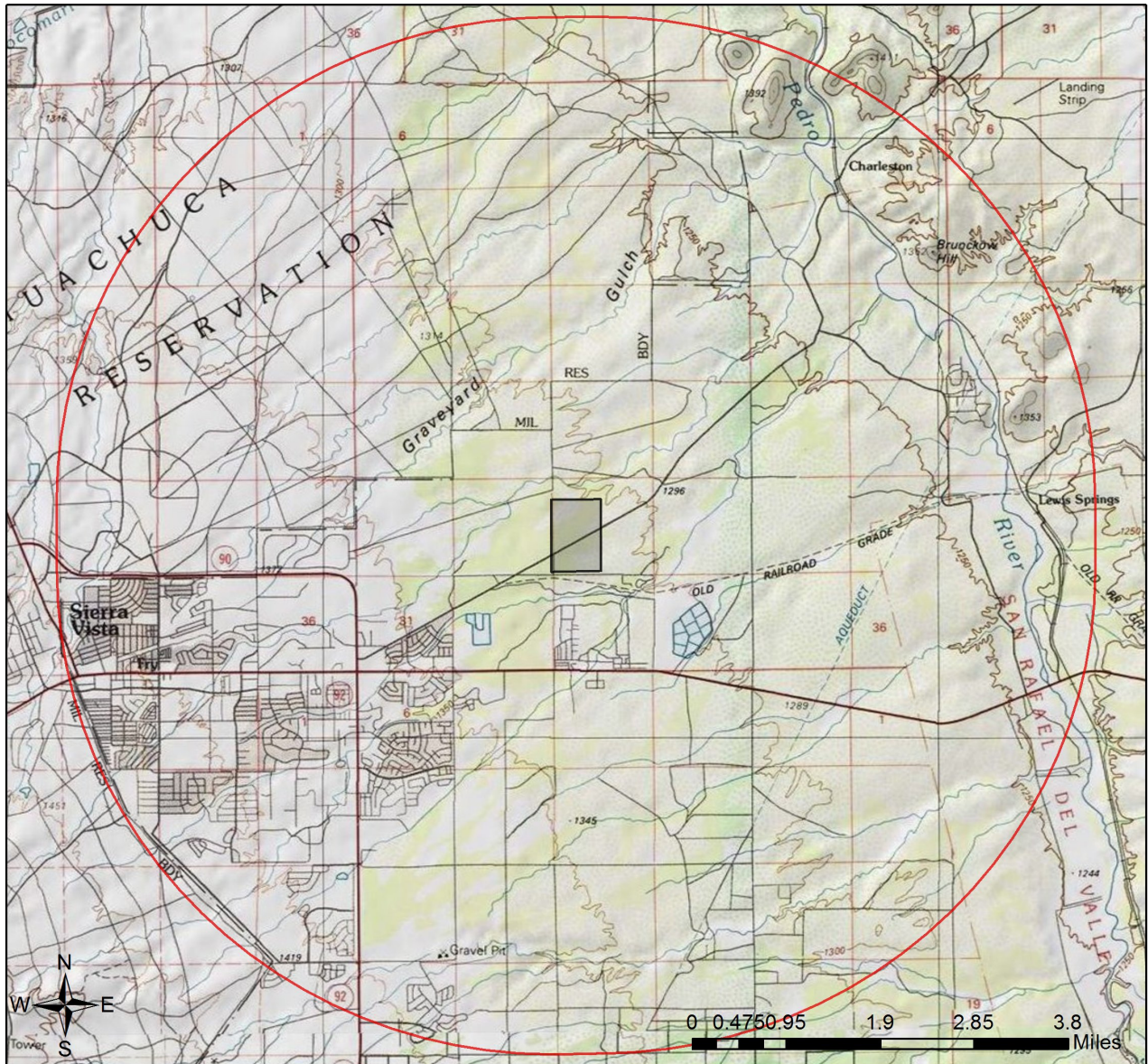
Locations Accuracy Disclaimer:

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

Greenstone Bella Vista Solar USA Topo Basemap With Locator Map



- Project Boundary
- Buffered Project Boundary

Project Size (acres): 240.22

Lat/Long (DD): 31.5747 / -110.2194

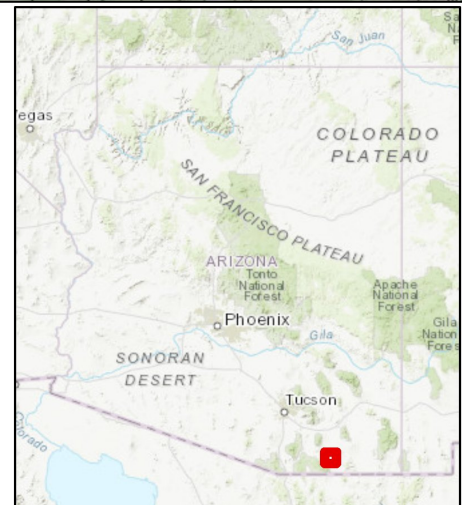
County(s): Cochise

AGFD Region(s): Tucson

Township/Range(s): T21S, R21E

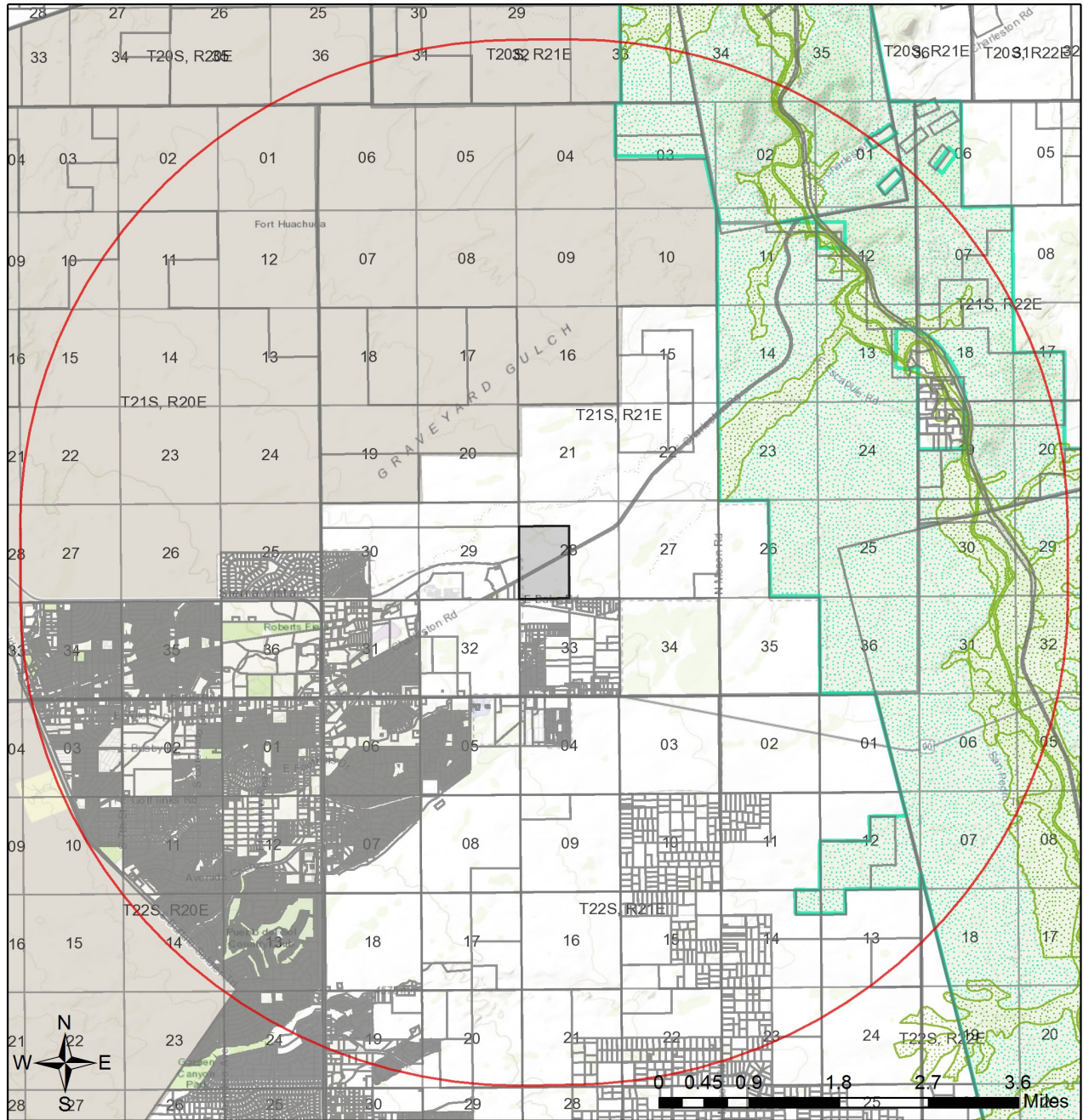
USGS Quad(s): LEWIS SPRINGS

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



Greenstone Bella Vista Solar

Web Map As Submitted By User



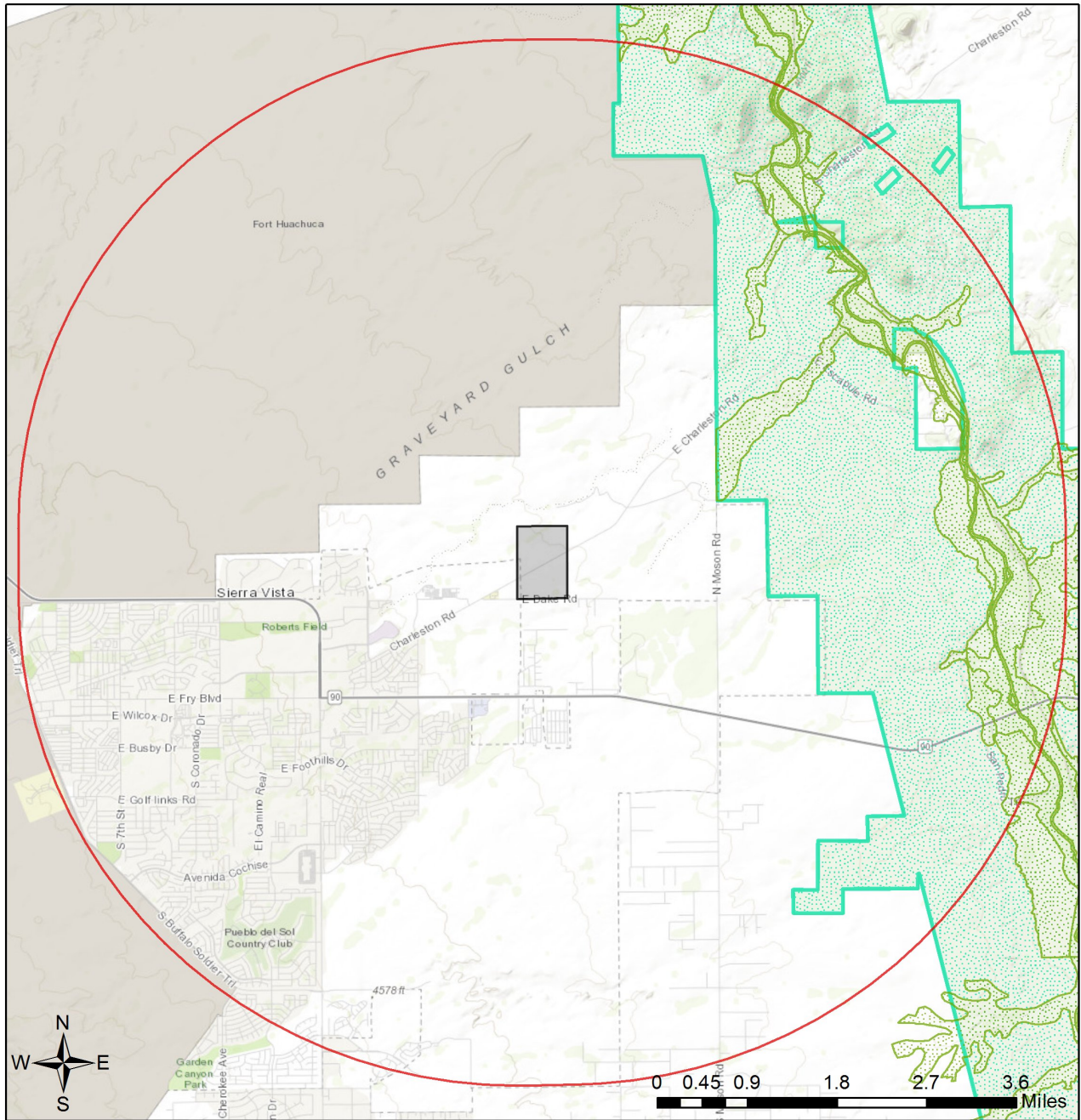
- Project Boundary
- Buffered Project Boundary
- Cad_Parcels
- Critical Habitat
- Important Bird Areas
- Counties
- Sections
- Townships

Project Size (acres): 240.22
 Lat/Long (DD): 31.5747 / -110.2194
 County(s): Cochise
 AGFD Region(s): Tucson
 Township/Range(s): T21S, R21E
 USGS Quad(s): LEWIS SPRINGS

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

Greenstone Bella Vista Solar

Important Areas



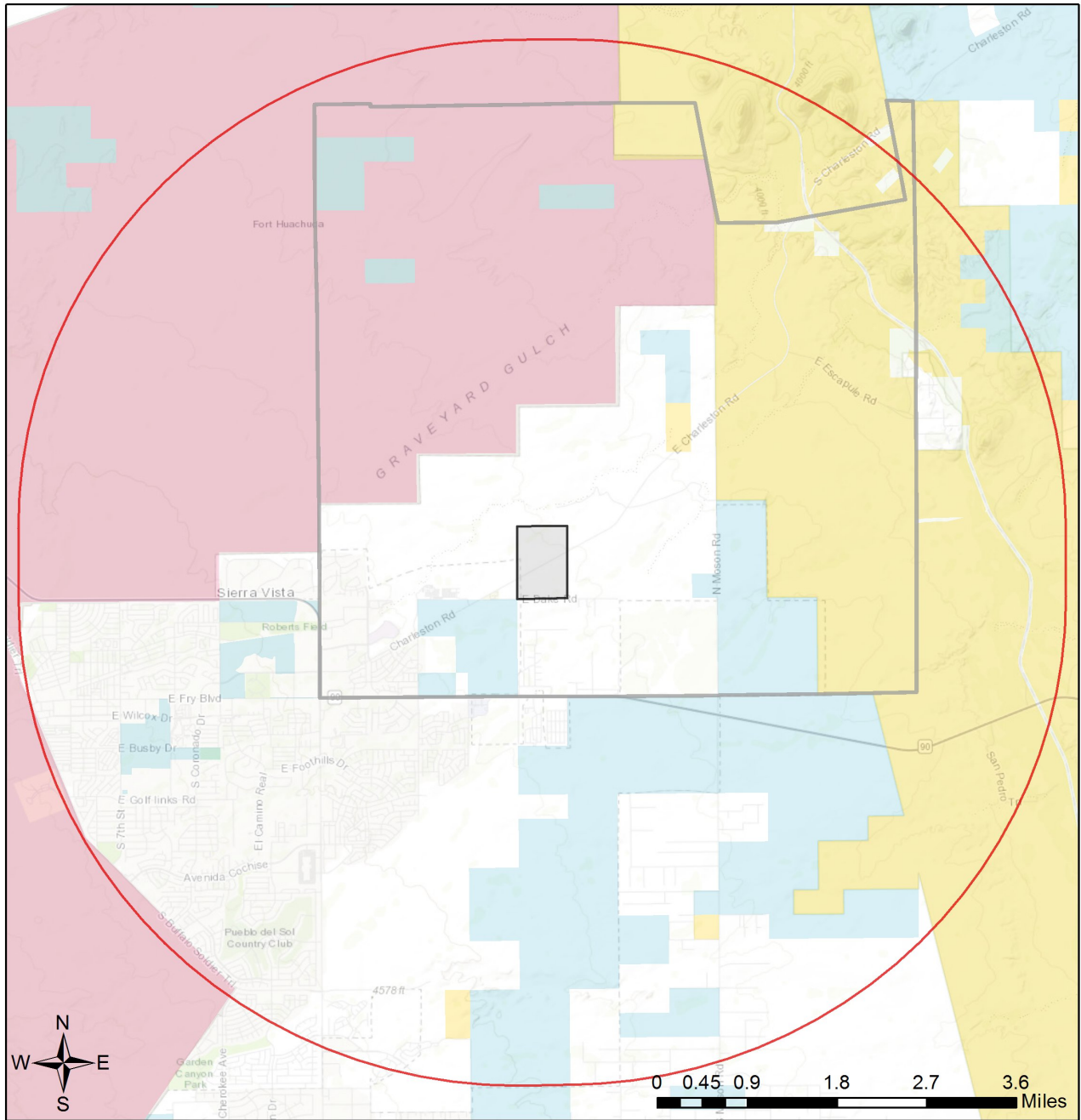
- Project Boundary
- Buffered Project Boundary
- Wildlife Connectivity
- Important Connectivity Zones
- Pinal County Riparian
- Critical Habitat
- Important Bird Areas

Project Size (acres): 240.22
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Greenstone Bella Vista Solar

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): 240.22
 Lat/Long (DD): 31.5747 / -110.2194
 County(s): Cochise
 AGFD Region(s): Tucson
 Township/Range(s): T21S, R21E
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Special Status Species Documented within 5 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Agosia chrysogaster chrysogaster	Gila Longfin Dace	SC		S		1B
Amazilia violiceps	Violet-crowned Hummingbird		S			1B
Anthus spragueii	Sprague's Pipit	SC				1A
Buteo plagiatus	Gray Hawk	SC				
Camptostoma imberbe	Northern Beardless-Tyrannulet		S			
Catharus ustulatus	Swainson's Thrush					1B
Catostomus clarkii	Desert Sucker	SC	S	S		1B
Centronyx bairdii	Baird's Sparrow	SC	S			1C
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S			1A
Cyprinodon macularius	Desert Pupfish	LE				1A
Empidonax traillii extimus	Southwestern Willow Flycatcher	LE				1A
Eryngium sparganophyllum	Arizona Eryngo			S		
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1A
Heloderma suspectum	Gila Monster					1A
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		1B
Lampropeltis nigrita	Mexican Black Kingsnake					1B
Lasiurus blossevillii	Western Red Bat		S			1B
Lasiurus xanthinus	Western Yellow Bat		S			1B
Leopardus pardalis	Ocelot Area of Possible Occurrence	LE				1A
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC				1A
Lilaeopsis schaffneriana ssp. recurva	Huachuca Water-umbel	LE			HS	
Lithobates chiricahuensis	Chiricahua Leopard Frog	LT				1A
Lithobates yavapaiensis	Lowland Leopard Frog	SC	S	S		1A
Panthera onca	Jaguar Area of Possible Occurrence	LE				1A
Poeciliopsis occidentalis occidentalis	Gila Topminnow	LE				1A
Terrapene ornata luteola	Desert Box Turtle			S		1A
Thamnophis eques megalops	Northern Mexican Gartersnake	LT	S			1A

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

Special Areas Documented within the Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Canis lupus baileyi	10J area Zone 2 for Mexican Wolf	LE,XN				

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

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>Aix sponsa</i>	Wood Duck					1B
<i>Amazilia violiceps</i>	Violet-crowned Hummingbird		S			1B
<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>Athene cucularia 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>Calypte costae</i>	Costa's Hummingbird					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 tigris</i>	Tiger Rattlesnake					1B
<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>Empidonax traillii extimus</i>	Southwestern Willow Flycatcher	LE				1A
<i>Euderma maculatum</i>	Spotted Bat	SC	S	S		1B
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat	SC		S		1B
<i>Falco peregrinus anatum</i>	American Peregrine Falcon	SC	S	S		1A
<i>Glaucidium gnoma gnoma</i>	Mountain Pygmy-owl					1B
<i>Haliaeetus leucocephalus</i>	Bald Eagle	SC, BGA	S	S		1A
<i>Heloderma suspectum</i>	Gila Monster					1A
<i>Hypsiglena sp. nov.</i>	Hooded Nightsnake					1B
<i>Incilius alvarius</i>	Sonoran Desert Toad					1B
<i>Kinosternon sonoriense sonoriense</i>	Desert Mud Turtle			S		1B
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			1B
<i>Leopardus pardalis</i>	Ocelot	LE				1A
<i>Leptonycteris yerbabuenae</i>	Lesser Long-nosed Bat	SC				1A
<i>Lepus alleni</i>	Antelope Jackrabbit					1B
<i>Melanerpes uropygialis</i>	Gila Woodpecker					1B
<i>Meleagris gallopavo mexicana</i>	Gould's Turkey		S			1B
<i>Melospiza lincolni</i>	Lincoln's Sparrow					1B
<i>Melospiza aberti</i>	Abert's Towhee		S			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>Peucaea botterii arizonae</i>	Arizona Botteri's Sparrow			S		1B
<i>Peucaea carpalis</i>	Rufous-winged Sparrow					1B
<i>Phrynosoma solare</i>	Regal Horned Lizard					1B
<i>Setophaga petechia</i>	Yellow Warbler					1B
<i>Sphyrapicus nuchalis</i>	Red-naped Sapsucker					1C
<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: Energy Storage/Production/Transfer, Energy Production (generation), photovoltaic solar facility (new)

Project Type Recommendations:

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

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.

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, <https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/water/quality/?cid=stelprdb1044769> 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>.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

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.

For any powerlines built, proper design and construction of the transmission line is necessary to prevent or minimize risk of electrocution of raptors, owls, vultures, and golden or bald eagles, which are protected under state and federal laws. Limit project activities during the breeding season for birds, generally March through late August, depending on species in the local area (raptors breed in early February through May). Conduct avian surveys to determine bird species that may be utilizing the area and develop a plan to avoid disturbance during the nesting season. For underground powerlines, trenches should be covered or back-filled as soon as possible. Incorporate escape ramps in ditches or fencing along the perimeter to deter small mammals and herptef fauna (snakes, lizards, tortoise) from entering ditches. In addition, indirect affects to wildlife due to construction (timing of activity, clearing of rights-of-way, associated bridges and culverts, affects to wetlands, fences) should also be considered and mitigated.

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.

The Department requests further coordination to provide project/species specific recommendations, please contact Project Evaluation Program directly at PEP@azgfd.gov.

Project Location and/or Species Recommendations:

Your project site is within one or more defined **Areas of Possible Occurrence**. Please follow Department protocols while working within an Area of Potential Occurrence at U:\Agency Directives\Jaguar Ocelot and Mexican Wolf Management Directive 20171215.pdf

HDMS records indicate that one or more native plants listed on the **Arizona Native Plant Law and Antiquities Act** have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture
1688 W Adams St.
Phoenix, AZ 85007
Phone: 602.542.4373

<https://agriculture.az.gov/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf> starts on page 44

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

HDMS records indicate that **Chiricahua Leopard Frogs** have been documented within the vicinity of your project area. Please review the Chiricahua Leopard Frog Management Guidelines found at: <https://s3.amazonaws.com/azgfd-portal-wordpress/PortallImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/FINALLithchirHabitatGdlns.pdf>



November 20, 2020

Ms. Christine McLachlan
Planner II
Cochise County
1415 Melody Lane, Building F
Bisbee, AZ 85603

Electronically submitted to: cmclachlan@cochise.az.gov

RE: Bella Vista Solar Project

Dear Ms. McLachlan:

At the request of Cochise County, the Arizona Game and Fish Department (Department) has reviewed the proposed solar facility in Cochise County near Sierra Vista, Arizona. The Department understands that Greenstone Capital (Greenstone) is proposing the development of a photovoltaic solar facility, with the possibility of battery storage, on approximately 125 - 150 acres of undeveloped land.

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 and protect 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 the county and the state's economic growth needs and opportunities to develop renewable energy locations. The Department recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or mitigate potential impacts to wildlife habitat and populations.

With the information provided, the Department has not identified any site specific concerns regarding wildlife. However, to the extent possible, the Department does encourage pre-construction surveys and monitoring to determine species presence as referenced in our Guidelines for Solar Projects in Arizona, which can be found at: <https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/FinalSolarGuidelines03122010.pdf>. The Department is available to review survey designs, provide input on developing best-management practices and are generally available to continue working closely to develop this economically-important facility while also minimizing any impacts to wildlife during development and operation of the facility.

azgfd.gov | 602.942.3000

5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

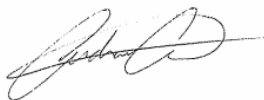
GOVERNOR: DOUGLAS A. DUCEY **COMMISSIONERS:** CHAIRMAN KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN
JAMES E. GOUGHNOUR, PAYSON | TODD G. GEILER, PRESCOTT | ERIC S. SPARKS, TUCSON **DIRECTOR:** TY E. GRAY **DEPUTY DIRECTOR:** TOM P. FINLEY

The Department would like to provide the following general recommendations:

1. If wildlife is 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).
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 eagles are vulnerable to electrocution and 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 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 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 comments on this proposed project. As project specifics are not known at this time, these comments and recommendations may change when more information is received as this project develops. The Department looks forward to continued communications with Cochise county and Greenstone regarding project development and implementation. 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 (gritter@azgfd.gov)
John Windes, Habitat Program Manager, Region V (jwindes@azgfd.gov)

AGFD #M20-11091945

From: [Koch, David L \(Dave\) CIV USARMY ID-TRAINING \(USA\)](#)
To: [McLachlan, Christine](#)
Cc: [Smith, Alexandra Z CIV USARMY USAG \(USA\)](#); [Koch, David L \(Dave\) CIV USARMY ID-TRAINING \(USA\)](#)
Subject: Fort Huachuca Close out reference SU-20-17 and Z-20-14 (Bella Vista Solar) (UNCLASSIFIED)
Date: Monday, January 4, 2021 1:54:12 PM

CAUTION: EXTERNAL EMAIL*

CLASSIFICATION: UNCLASSIFIED

Happy New Year Christine,

The Fort Huachuca Board Members have completed their review of the proposed project, and have no issues or concerns based on the information provided.

Dave

/r

David L. Koch
Chief, PAIO
USAG, Fort Huachuca, AZ
Office: (520) 533-3135
DSN: 821-3135
Gov Cell: (520) 678-8433

From: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Sent: Thursday, December 10, 2020 12:58 PM
To: Koch, David L (Dave) CIV USARMY ID-TRAINING (USA) <david.l.koch4.civ@mail.mil>; Smith, Alexandra Z CIV USARMY USAG (USA) <alexandra.z.smith.civ@mail.mil>; Malarchik, Heidi M CIV USARMY USAG (USA) <heidi.m.malarchik.civ@mail.mil>
Subject: [Non-DoD Source] Re-transmittal for SU-20-17 and Z-20-14 (Bella Vista Solar)

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Good afternoon,

This is a re-transmittal of the Bella Vista Solar Docket (SU-20-17 and Z-20-14). At the request of the Fort and the Planning and Zoning Commission, the first public hearing of this docket has been postponed until January 13, 2021. See the attached transmittal and attachments. Please have all comments back to me no later than Monday, January 4, 2021.

Thank you,

Christine McLachlan, AICP
Planner II
Cochise County
Development Services Department
1415 Melody Lane, Building F
Bisbee, AZ 85603
cmclachlan@cochise.az.gov
P: 520-432-9266
F: 520-432-9278

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