



# 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-21-12 (Whetstone Telecom N) Agency Comments Summary  
**DATE:** May 5, 2021 for the May 12, 2021 Meeting

#### AGENCY COMMENTS DOCKET SU-21-12 (Whetstone Telecom N)

On April 9, 2021, the Development Review Team for the County was transmitted case information for their review. Reviewers were given until April 26, 2021 to respond and were notified that a failure to respond by that date would result in an automatic approval by their agency/Department.

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

**Cochise County, ROW:** Calle Quinto is a 60' public right-of-way, no need for further dedication at this time.

**Cochise County, Environmental Health:** No Concerns

**Cochise County Engineering:** Please clarify the distance from the 50' tall pole if it should fall over, what is that distance to the building in the aerial? Also would like to see something in writing from the property owner "granting / giving" permission to use his land.

*(Planning response: Per 1813.04 Communication facilities must be setback from all parcel boundaries, lease boundaries and rights-of-way a distance equal to at least the height of the tallest structure in the facility, measuring from its base, distance from buildings is not regulated by zoning. Letter of authorization is included in the application packet.)*

**Cochise County Building:** No comments received.

**Cochise County Attorney's Office:** No comments received.

**Fire Department:** No Comments received.

**Cochise County Sheriff's Office:** No Comments received.

**Sulfur Springs Valley Electric Cooperative:** SSVEC has no special conditions to submit for this special use permit.

Per the application, the equipment attached to this structure will require new service. Because the owner of the structure is not the owner of record for the property, SSVEC will require an easement from the property owner prior to constructing the new service.

Please refer to the Sulphur Springs Valley Electric Cooperative website at [www.ssvec.org](http://www.ssvec.org) then the "Services" tab for information about how to establish a new service, Service Conditions, Service Entrance Requirements, and an application for a New Service/Line Extension Application.

#### **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](mailto:planningandzoning@cochise.az.gov)

You can also contact one of our Engineering Services Representatives for assistance:

- Sierra Vista- 520-515-3465
- Willcox: 520-384-5469

**Southwest Gas:** 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:** No comments received.

**Fort Huachuca:** With regard to both of these requests, we would like to know the frequencies being used to transmit and receive data.

*(Applicant Response: “we will have 18GHz Licensed Back haul links, 3GHz CBRS access points to serve the customers, and possibly some 5GHz off these new sites.”)*

Ft. Huachuca: Our Frequency Spectrum Manager provided this feedback, so we still have a question about the frequencies being used in the 5GHz band. See below.

The rules governing the Citizens Broadband Radio Service (CBRS 3550-3700) are found in Part 96 of the FCC’s rules, link below.

The CBRS and 18 GHz backhauls are not an issue. I am interested to know what frequencies in the 5 GHz they will be using. Fort Huachuca has 2-14th and CBP flying UAVs in the 5 GHz band.

\* CBRS 3550-3700.....no issues.

\* 18GHz.....no issues.

\* 5GHz.....!! If they are planning to use this band, we need to know.

*(Applicant Response: “We are not planning on using 5GHz on these locations, it was just a possibility. We have 5GHz already in production on the other site we have in the area, and the reason why we are wanting to put these other site in with other frequencies to mitigate the noise that we know is in the area. I will relay this to our engineers so we can plan ahead to let the Fort know if 5GHz is planned.”)*

*(Planning Response: Condition recommended that “The applicant shall notify the County Zoning Inspector of any proposed frequency changes” to ensure the County and Fort are notified if any changes to frequency, including 5 GHz is planned.)*



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April 26, 2021

Chris McLachlan  
Cochise County  
Development Services Department  
1415 Melody Lane, Building F  
Bisbee, AZ 85603

Electronically submitted to: [cmclachlan@cochise.az.gov](mailto:cmclachlan@cochise.az.gov)

Re: Review of the SU-21-12 N Whetstone telecom project

Dear Ms. McLachlan:

The Arizona Game and Fish Department (Department) reviewed your Project Evaluation Request dated month, date, year, regarding the construction of a new 50' tall telecommunications tower and related equipment in Cochise County, Whetstone, Arizona. As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

Thank you for the opportunity to review this project. The report created for you (attached) on Arizona's Online Environmental Review Tool should provide general recommendations and additional contact information. If you have any questions regarding this letter, please contact me at (623) 236-7513.

Sincerely,

A handwritten signature in black ink that reads "Tracy C. Bazelman".

Tracy C. Bazelman  
Project Evaluation Program Specialist, Habitat Branch  
Arizona Game and Fish Department

AZGFD# M21-04095454

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**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 | CLAY HERNANDEZ, TUCSON **DIRECTOR:** TY E. GRAY **DEPUTY DIRECTOR:** TOM P. FINLEY

# 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:**

2573 N Calle Quinto Huachuca City, AZ 85616

**Project Description:**

2573 N Calle Quinto Huachuca City, AZ 85616

**Project Type:**

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

**Contact Person:**

Tracy C. Bazelman

**Organization:**

AGFD

**On Behalf Of:**

COCHISE

**Project ID:**

HGIS-13349

***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.

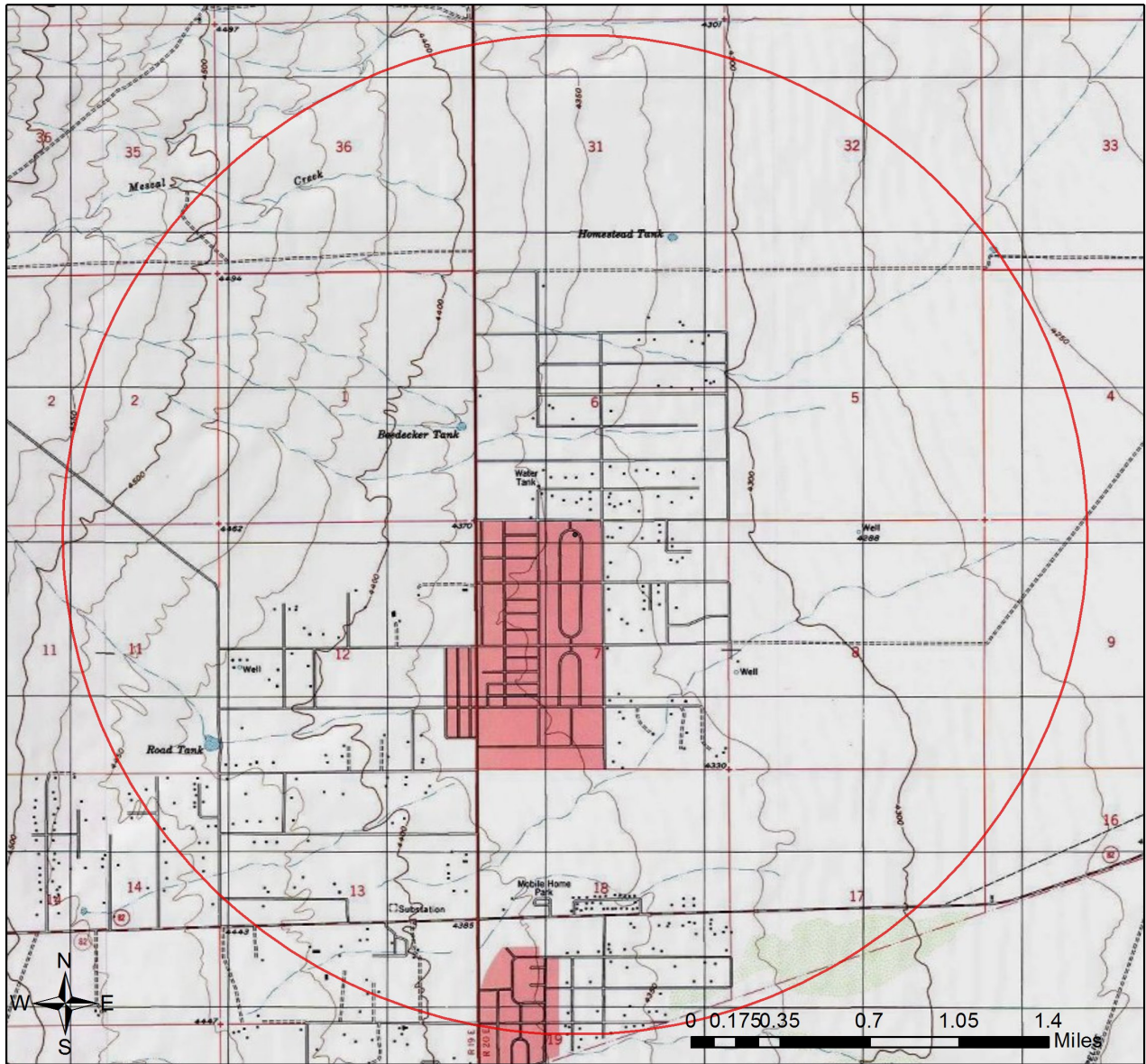
**Locations Accuracy Disclaimer:**



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](mailto: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

## 2573 N Calle Quinto Huachuca City, AZ 85616 USA Topo Basemap With Locator Map



-  Project Boundary
-  Buffered Project Boundary

Project Size (acres): 0.08

Lat/Long (DD): 31.7151 / -110.3437

County(s): Cochise

AGFD Region(s): Tucson

Township/Range(s): T20S, R20E

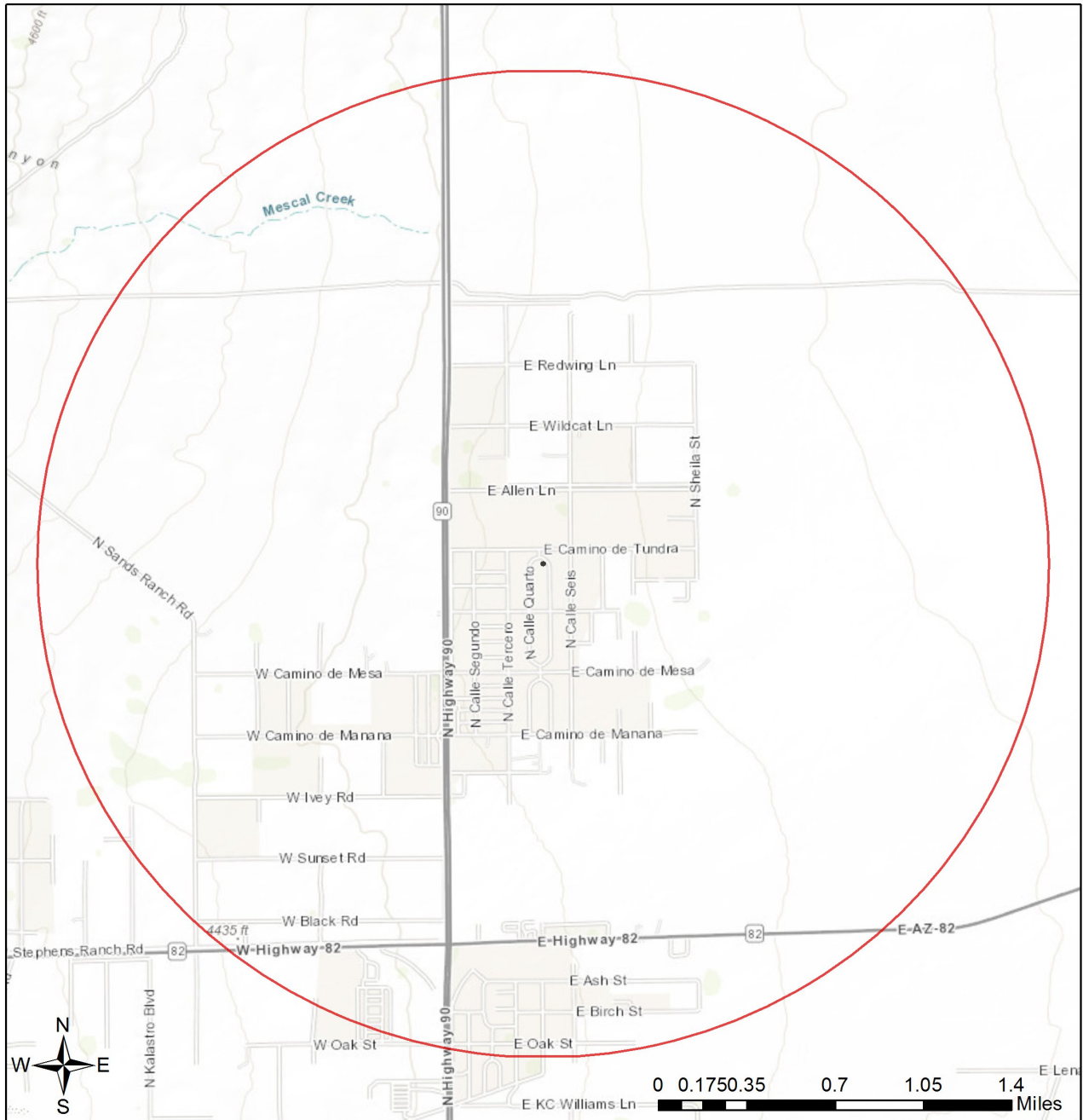
USGS Quad(s): HUACHUCA CITY

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



# 2573 N Calle Quinto Huachuca City, AZ 85616

Web Map As Submitted By User



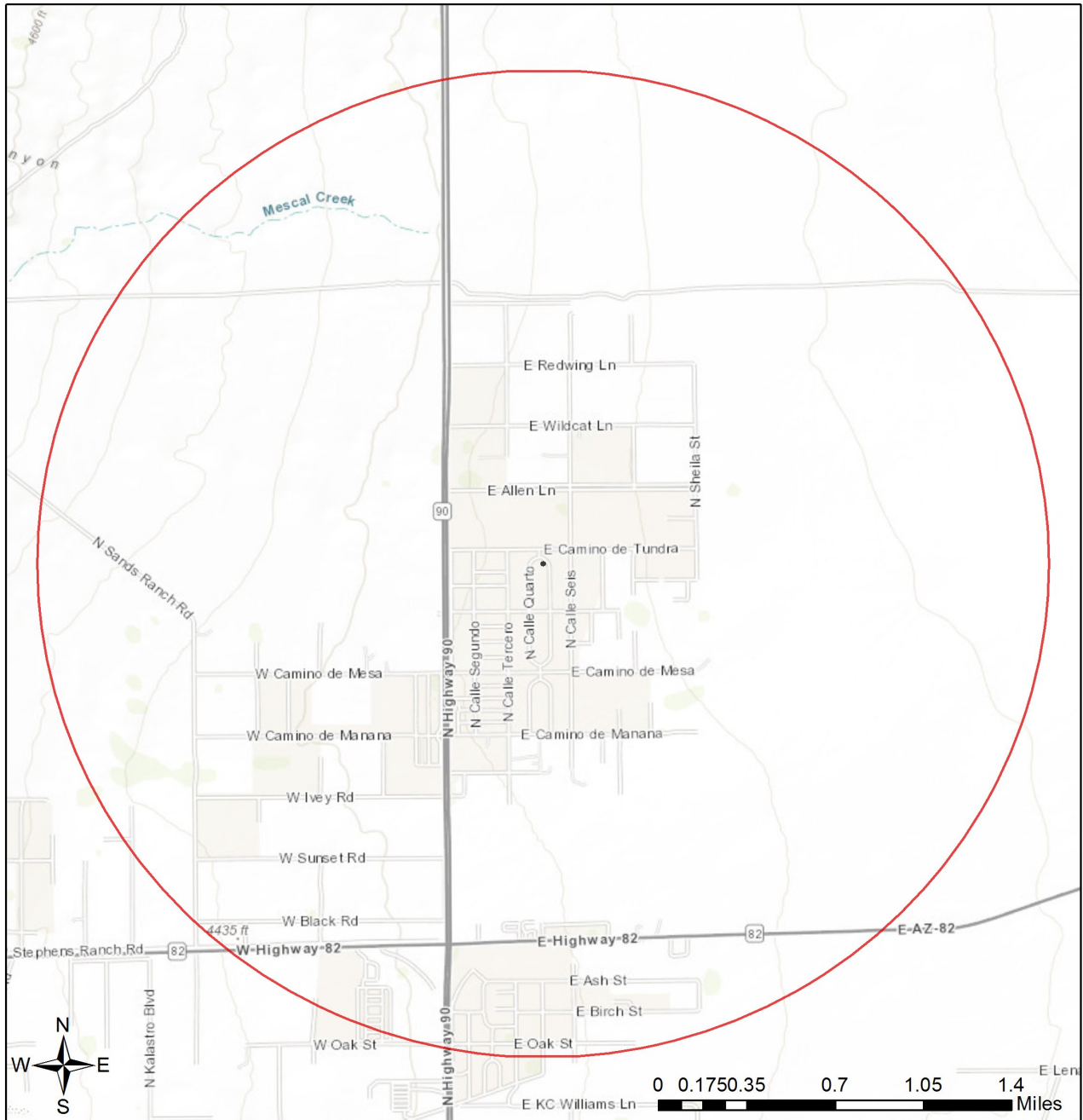
- Project Boundary
- Buffered Project Boundary

Project Size (acres): 0.08  
Lat/Long (DD): 31.7151 / -110.3437  
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Township/Range(s): T20S, R20E  
USGS Quad(s): HUACHUCA CITY

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

## 2573 N Calle Quinto Huachuca City, AZ 85616

### Important Areas



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

Project Size (acres): 0.08  
 Lat/Long (DD): 31.7151 / -110.3437  
 County(s): Cochise  
 AGFD Region(s): Tucson  
 Township/Range(s): T20S, R20E  
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## 2573 N Calle Quinto Huachuca City, AZ 85616

### Township/Ranges and Land Ownership



- |  |   |
|--|---|
| <span style="border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Project Boundary        | <span style="background-color: #FFC0CB; display: inline-block; width: 15px; height: 10px;"></span> Military               |
| <span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px;"></span> Buffered Project Boundary | <span style="background-color: #90EE90; display: inline-block; width: 15px; height: 10px;"></span> Mixed/Other            |
| <span style="border: 1px solid grey; display: inline-block; width: 15px; height: 10px;"></span> Township/Ranges          | <span style="background-color: #D8BFD8; display: inline-block; width: 15px; height: 10px;"></span> National Park/Mon.     |
| <b>Land Ownership</b>  |   |
| <span style="background-color: #D2B48C; display: inline-block; width: 15px; height: 10px;"></span> AZ Game & Fish Dept.  | <span style="background-color: #A08080; display: inline-block; width: 15px; height: 10px;"></span> State & Regional Parks |
| <span style="background-color: #FFFACD; display: inline-block; width: 15px; height: 10px;"></span> BLM                   | <span style="background-color: #ADD8E6; display: inline-block; width: 15px; height: 10px;"></span> State Trust            |
| <span style="background-color: #D2B48C; display: inline-block; width: 15px; height: 10px;"></span> BOR                   | <span style="background-color: #90EE90; display: inline-block; width: 15px; height: 10px;"></span> US Forest Service      |
| <span style="background-color: #FFDAB9; display: inline-block; width: 15px; height: 10px;"></span> Indian Res.           | <span style="background-color: #3CB371; display: inline-block; width: 15px; height: 10px;"></span> Wildlife Area/Refuge   |

Project Size (acres): 0.08  
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**Special Status Species Documented within 2 Miles of Project Vicinity**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Terrapene ornata luteola	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 that Intersect with Project Footprint as Drawn, based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammodramus savannarum ammolegus	Arizona grasshopper sparrow		S	S		1B
Ammodramus savannarum perpallidus	Western Grasshopper Sparrow					1B
Ammospermophilus harrisi	Harris' Antelope Squirrel					1B
Anthus spragueii	Sprague's Pipit	SC				1A
Athene cucularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Buteo regalis	Ferruginous Hawk	SC		S		1B
Buteo swainsoni	Swainson's Hawk					1C
Callipepla squamata	Scaled Quail					1C
Calypte costae	Costa's Hummingbird					1C
Chordeiles minor	Common Nighthawk					1B
Coluber bilineatus	Sonoran Whipsnake					1B
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Crotalus tigris	Tiger Rattlesnake					1B
Cyananthus latirostris	Broad-billed Hummingbird		S			1B
Cynomys ludovicianus	Black-tailed Prairie Dog	CCA		S		1A
Dipodomys spectabilis	Banner-tailed Kangaroo Rat			S		1B
Euderma maculatum	Spotted Bat	SC	S	S		1B
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		1B
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1A
Heloderma suspectum	Gila Monster					1A
Hypsiglena sp. nov.	Hooded Nightsnake					1B
Incilius alvarius	Sonoran Desert Toad					1B
Lasiurus blossevillii	Western Red Bat		S			1B
Lasiurus xanthinus	Western Yellow Bat		S			1B
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC				1A
Lepus alleni	Antelope Jackrabbit					1B
Lithobates chiricahuensis	Chiricahua Leopard Frog	LT				1A
Melanerpes uropygialis	Gila Woodpecker					1B

**Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Melospiza lincolnii	Lincoln's Sparrow					1B
Micrathene whitneyi	Elf Owl					1C
Micruroides euryxanthus	Sonoran Coralsnake					1B
Myiarchus tyrannulus	Brown-crested Flycatcher					1C
Myotis occultus	Arizona Myotis	SC		S		1B
Myotis velifer	Cave Myotis	SC		S		1B
Myotis yumanensis	Yuma Myotis	SC				1B
Notiosorex cockrumi	Cockrum's Desert Shrew					1B
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					1B
Oreoscoptes montanus	Sage Thrasher					1C
Oreothlypis luciae	Lucy's Warbler					1C
Panthera onca	Jaguar	LE				1A
Passerculus sandwichensis	Savannah Sparrow					1B
Peucaea botterii arizonae	Arizona Botteri's Sparrow			S		1B
Peucaea carpalis	Rufous-winged Sparrow					1B
Phrynosoma solare	Regal Horned Lizard					1B
Setophaga petechia	Yellow Warbler					1B
Spizella breweri	Brewer's Sparrow					1C
Sturnella magna	Eastern Meadowlark					1C
Tadarida brasiliensis	Brazilian Free-tailed Bat					1B
Terrapene ornata	Ornate Box Turtle					1A
Vireo bellii arizonae	Arizona Bell's Vireo					1B
Vulpes macrotis	Kit Fox	No Status				1B

**Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Callipepla squamata	Scaled Quail					1C
Odocoileus hemionus	Mule Deer					
Patagioenas fasciata	Band-tailed Pigeon					1C
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	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 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. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at <https://www.invasivespeciesinfo.gov/unitedstates/az.shtml> and the Arizona Native Plant Society <https://aznps.com/invas> for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at <https://imap.natureserve.org/imap/services/page/map.html>.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

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.