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February 14, 2023

Susan Bronson, AICP, LEED AP  
Cochise County Development Services  
1415 Melody Lane, Building F  
Bisbee, AZ 85603

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

Re: Review of the Cochise County SU23-03 CM Contract Construction Services residential

Dear Ms. Bronson:

The Arizona Game and Fish Department (Department) reviewed your Project Evaluation Request dated January 27, 2023, regarding the construction of a residence on a 10-acre parcel. Parcel 123-30-005C is located at 1778 E. Ramsey Road, Benson, Arizona. The project is situated within primarily undeveloped land with semi-desert grassland and Chihuahuan desert scrub vegetation present.

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

- The Department recommends that a qualified biologist conduct a survey for nesting birds within the project area prior to removal or trimming of trees/vegetation, if the removal or trimming occurs during the breeding season. The trees and/or vegetation within the project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA) and protected under state law. Breeding season for birds in the project vicinity is generally mid-February through late September, depending on the species and habitat, and for raptors it is generally January through late June. If it is anticipated the project will not be in compliance with MBTA, the Department also recommends that you contact the [U.S. Fish and Wildlife Service](#)<sup>1</sup> (USFWS) for their technical assistance. The USFWS will provide options to comply with the MBTA.
- If proposed ground disturbance (both temporary and permanent) will meet or exceed 0.25 acre in areas with native vegetation, please ensure the project complies with [Arizona Native Plant Law](#) regulations<sup>2</sup>. A Native Plant Inventory may need to be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under

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<sup>1</sup> <https://www.fws.gov/office/arizona-ecological-services/contact-us>

<sup>2</sup> <https://agriculture.az.gov/plantsproduce/native-plants>

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**azgfd.gov | 602.942.3000**

**5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086**

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the Arizona Native Plant Law. In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts.

- Please 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. The Arizona Department of Agriculture's website has a list of prohibited and restricted [noxious weeds](#)<sup>3</sup> and the [Arizona Native Plant Society](#)<sup>4</sup> for recommendations on control methods.
- To further limit the spread of non-native, invasive plant species, the Department recommends landscaping with drought-tolerant species that are native to the area. Landscaping with native plants can help support wildlife and pollinator species that inhabit rural and urbanized areas. Visit the [Arizona Native Plant Society's website](#)<sup>5</sup> for information on preferred native plants to utilize in landscaping.
- Given the project's proximity to undeveloped native habitat, artificial lighting could impair the ability of nocturnal animals to navigate (e.g., owls, migratory birds, bats, and other nocturnal mammals) and may affect wildlife behavior and populations. The Department recommends using only the minimum amount of light needed for safety, especially in areas immediately adjacent to open space or undeveloped lands. The Department encourages the use of motion sensing lighting and narrow spectrum lighting wherever possible to lower the range of species affected by lighting. Also, please consider shielding, canting, or cutting all lighting, where possible, to ensure that light reaches only areas needing illumination and to minimize impacts to nocturnal wildlife.

The Department appreciates the opportunity to provide an evaluation of impacts to wildlife or wildlife habitats associated with the Cochise County SU23-03 CM Contract Construction Services residential project. If you have any questions regarding this letter, please contact me at (623) 236-7615 and visit our [website](#)<sup>6</sup> for additional guidelines.

Sincerely,

*Cheri Bouchér*

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

AZGFD #M23-01315928

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<sup>3</sup> <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>

<sup>4</sup> <https://aznps.com/invas>

<sup>5</sup> <https://aznps.com/grow-native/>

<sup>6</sup> <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>