

Taylor, Matthew

From: noreply@civicplus.com
Sent: Friday, March 20, 2026 2:18 PM
To: McLachlan, Christine; Taylor, Matthew
Subject: Online Form Submittal: Public Hearings - Public Comment Form

CAUTION: EXTERNAL EMAIL*

Public Hearings - Public Comment Form

Docket Number	SU26-04 (Winchester III Solar Energy Power Plant)
Select one of the following:	Yes, I support this request
Explanation	The County needs tax revenue to support its role. This is a quiet carbon free industry that is important to our future-
Name	Curtis Nolan
Email Address	curtis5555@me.com
Address	5555 N Fort Grant Rd
City	Willcox
State	AZ
Zip Code	85643-3202
Phone Number	5205074072
Your Tax Parcel Number	20986010B & 20986016F
File Upload	<i>Field not completed.</i>
Electronic Signature Agreement	I agree.
Electronic Signature	Curtis P Nolan

Your comments will be made available to the public board responsible for reviewing them. Submission of this form or any other correspondence becomes part of the public record and is available for review by the Applicant or other members of the public.

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DOCKET SU26-04

(WINCHESTER III SOLAR POWER PLANT)

____ YES, I SUPPORT THIS REQUEST
Please state your reasons:

X NO, I DO NOT SUPPORT THIS REQUEST
Please state your reasons:

1. Decreases our property values
2. Eyesore
3. Destroys the LAND
4. No Added Value to us or Willcoy

PRINT NAME(S):

GLEN V. JOHNSON Deborah Johnson
Johnson Family Trust

SIGNATURE(S):

[Handwritten Signature]
[Handwritten Signature]

YOUR TAX PARCEL NUMBER: 30986006 (eight-digit identification number found on your property tax statement)

Your comments will be made available to the Planning and Zoning Commission. Submission of this form or any other correspondence becomes part of the public record and is available for review by the applicant or other members of the public. Written comments must be received no later than April 3, 2026, at 5 p.m.

RETURN COMMENTS TO: Matthew Taylor
Cochise County Development Services
1415 Melody Lane, Building F
Bisbee, AZ 85603
mtaylor@cochise.az.gov



Scan the QR code to the right to submit comments online.

Taylor, Matthew

From: noreply@civicplus.com
Sent: Tuesday, March 31, 2026 4:45 PM
To: McLachlan, Christine; Taylor, Matthew
Subject: Online Form Submittal: Public Hearings - Public Comment Form

CAUTION: EXTERNAL EMAIL*

Public Hearings - Public Comment Form

Docket Number	SU26-04 (Winchester III Solar Energy Power Plant)
Select one of the following:	No, I do not support this request
Explanation	Please see the email I sent 3/31/26 (also attached) as my comments are too lengthy to write again here.
Name	Allison Morse
Email Address	morseali2@yahoo.com
Address	PO Box 16232
City	Portal
State	Arizona
Zip Code	85632
Phone Number	415-299-3109
Your Tax Parcel Number	40227003
File Upload	3.31.26 Yahoo Mail - Winchester III - OPPOSE.pdf
Electronic Signature Agreement	I agree.
Electronic Signature	Morse

Your comments will be made available to the public board responsible for reviewing them. Submission of this form or any other correspondence becomes part of the public record and is available for review by the Applicant or other members of the public.

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Taylor, Matthew

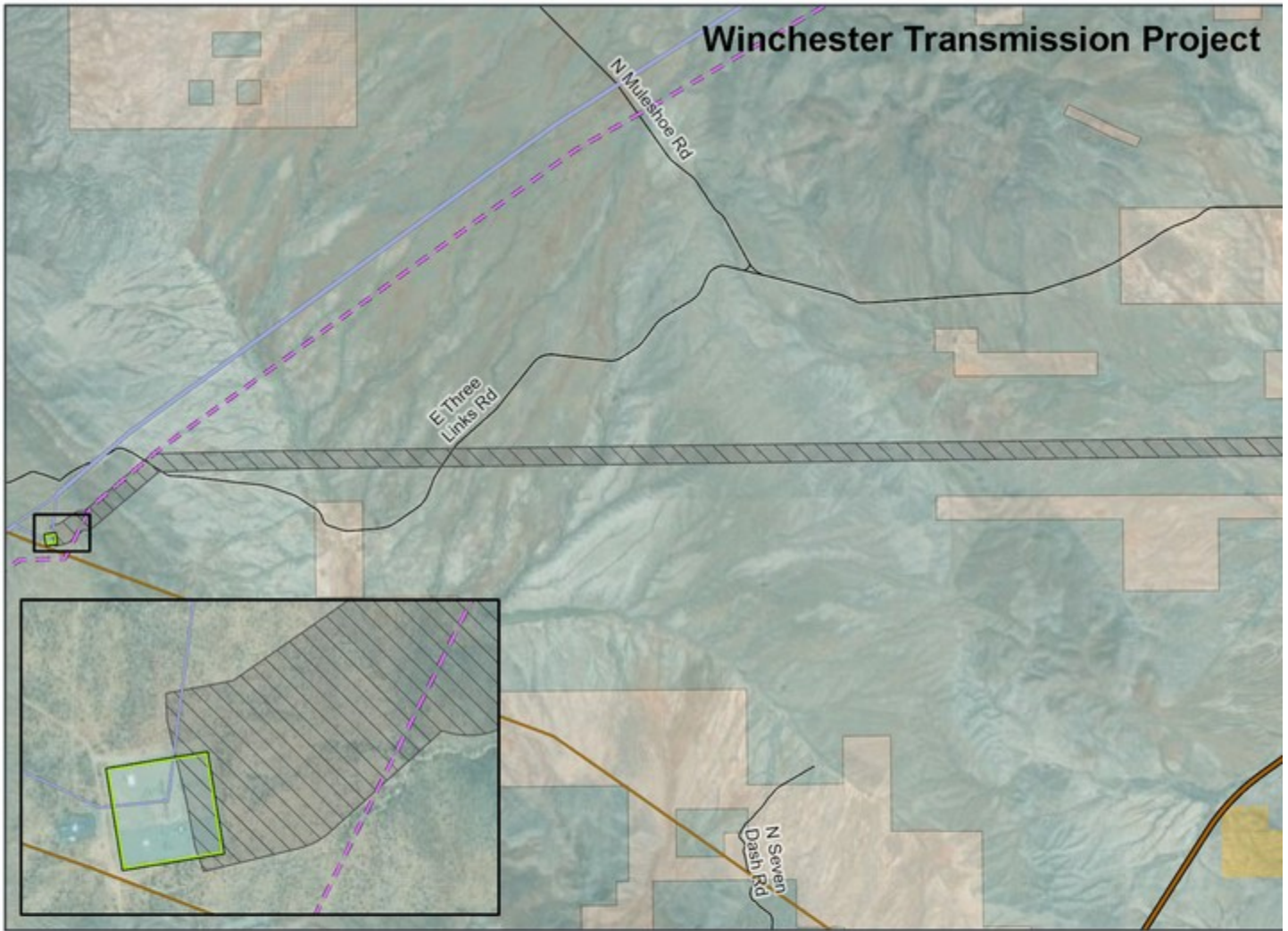
From: Ali Morse <morseali2@yahoo.com>
Sent: Tuesday, March 31, 2026 4:25 PM
To: McLachlan, Christine
Cc: Taylor, Matthew
Subject: Winchester III - OPPOSE

CAUTION: EXTERNAL EMAIL*

Good afternoon,

I would like to express my opposition to the Winchester III Special Use Application.

Winchester III represents the addition of 1250 acres to Winchester I and II (#2 in map at the very bottom map), making the project total almost 5,000 acres with a 1-GW transmission line to the TEP Winchester Substation via the [Winchester Transmission Project](#).



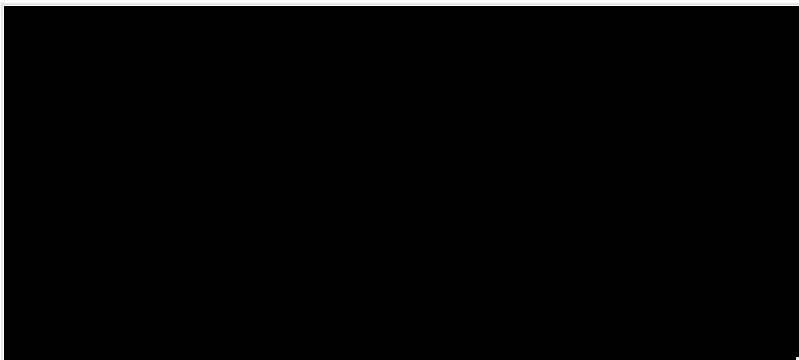
Transmission Project/CEC Features	Reference Features	Existing Transmission Line	Land Ownership
CEC Corridor	Highway	115kV	Bureau of Land Management
	Road	345kV	Military
	Planned SunZia Transmission Lines - 500kV	Unknown Voltage	Private / Municipal
	TEP Winchester Substation		State Trust
	Solar Project		

Winchester I and II (~3600 acres) and Winchester III (~1250 acres) are a joint project of [Torch Clean Energy](#) (solar) and [Fluence](#) (battery storage). The latter is publicly traded ([FLNC](#)). The power of the Winchester project is described as "formidable" [here](#). Torch Clean Energy is financed by [Morgan Stanley](#). Winchester III adds 200 MW solar PV and 800 MWh BESS.



Home Fluence | A Siemens and AES Company

Fluence is a global market leader in energy storage products and services, and cloud-based software for renewabl...

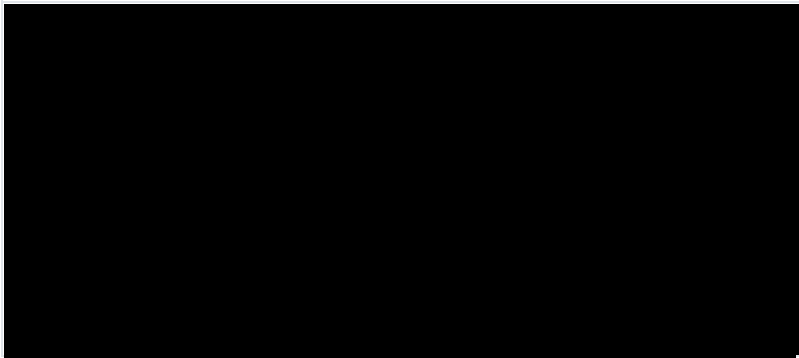


Fluence and Torch Clean Energy Unveil 160 MW / 640 MWh Winchester Solar-...

Peter Mwaniki

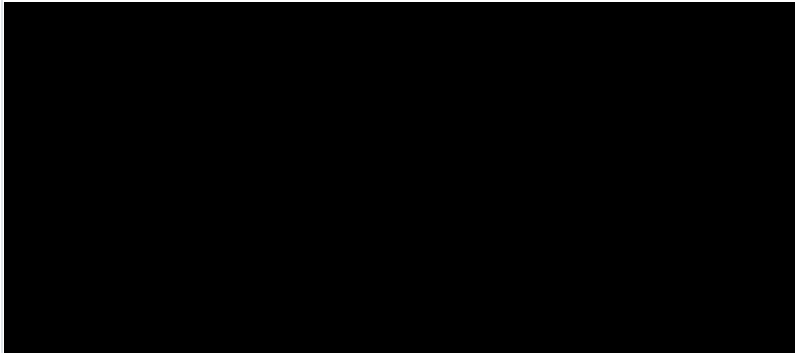
Fluence, Torch Clean Energy unveil Winchester Solar-Plus-Storage Project in Arizona, advancing clean energy with...

While the Winchester I and II project were presumably built to boost power for [Tucson Electric Power](#), it's not clear whether phase III will power a data center, here or elsewhere. It's not mentioned in their [Special Use Application notice](#) but that doesn't mean it or the whole 3-phase project could eventually power massive data center project(s) in the future.



New Solar Plus Battery System Will Continue TEP's Progress to a Cleaner,...

A new solar plus storage system planned for Cochise County will help Tucson Electric Power (TEP) provide more cl...



Torch Clean Energy

My concerns are the increasing number of BESS's which have hazmat and emergency response issues. Our county has several SEPPs with BESS's and apparently one has already caused a fire .

Conditions should include:

- 1) BAT (or BACT) required - e.g., highest industry standard least-risk practices; non-flammable batteries; etc
- 2) Upgrades every few years to newest available equipment
- 3) allowed only where adequate emergency response is available (either by existing system or they provide their own)
- 4) up-front bonding for closure and clean-up

If the power of the Winchester project is being used by TEP, are we supporting data center(s) in Tucson (like Project Blue) or a future data center here in CC?

As much as I am for renewable energy, these expansive areas of solar panels have other risks to humans and the environment:

- 1) leaching of toxins / heavy metals when damaged by hail or exposed to harsh sunlight over time and degrade

<https://www.sciencedirect.com/science/article/abs/pii/S0883292719301738>

- 2) increase atmospheric temperature, creating "heat islands"

<https://www.nature.com/articles/srep35070>

- 3) interference with avian migration patterns: attraction of insects due to "polarized light reflection" and thereby attracting birds to the areas

<https://phys.org/news/2025-07-solar-farms-lakes-birds-messing.html>

<https://www.mdpi.com/2673-7159/5/1/4>

- 4) destruction of native plants, displacement of animals, and interference with local ecosystems
- 5) decrease in property values
- 6) aesthetics - blight on the viewscape

Thank you for your consideration.

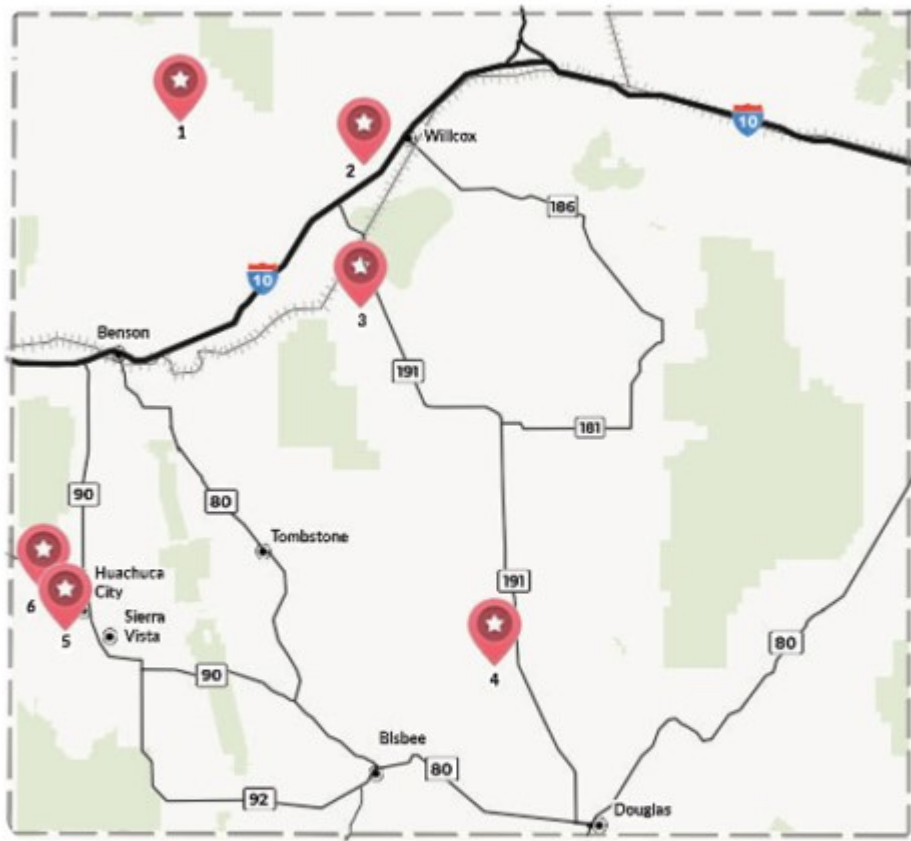
Sincerely,

Allison Morse
Portal



5: Energy Element

MAP 28: CURRENT SOLAR ENERGY POWER PLANTS



- 1 - Red Horse 2, Solar PV & Wind Turbine
- 2 - Winchester, Solar and BESS
- 3 - AEP&CO, SEPP and BESS
- 4 - SR McNeal, Solar PV & BESS
- 5 - Tucson Electric Power (TEP), Solar
- 6 - Babacomari, SEPP

Please see <https://cochise.maps.arcgis.com/> for the most detailed and up-to-date information.



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Taylor, Matthew

From: McLachlan, Christine
Sent: Wednesday, April 1, 2026 8:06 AM
To: Taylor, Matthew
Subject: Fw: public comments

Please include these emails in the comments for Winchester

Get [Outlook for iOS](#)

From: Ali Morse <morseali2@yahoo.com>
Sent: Wednesday, April 1, 2026 7:53:00 AM
To: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Cc: Taylor, Matthew <MTaylor@cochise.az.gov>
Subject: Fw: public comments

CAUTION: EXTERNAL EMAIL*

This why I thought my comments, submitted yesterday (Tuesday), would be included in the Public Comment document for next week's P&Z meeting (Wednesday).

Thank you,

Ali

----- Forwarded Message -----

From: McLachlan, Christine <cmclachlan@cochise.az.gov>
To: Ali Morse <morseali2@yahoo.com>
Sent: Thursday, March 26, 2026 at 04:53:20 PM MDT
Subject: Re: public comments

For more info about the BOS Calander or submission deadlines you can contact Lara Loewenheim:
<https://www.cochise.az.gov/directory.aspx?did=135>.

The deadline for comments to be attached to the P&Z Commission is any time prior to the publishing of the agenda, which is one week prior to the meeting. We will still accept comments after that date, but they will not be uploaded to the agenda.

Christine McLachlan, AICP

Director

Cochise County, Development Services
1415 Melody Lane, Building F
Bisbee, AZ 85603
520-432-9266
cmclachlan@cochise.az.gov

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From: Ali Morse <morseali2@yahoo.com>
Sent: Thursday, March 26, 2026 3:31 PM
To: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Subject: Re: public comments

CAUTION: EXTERNAL EMAIL*

Thank you--I've seen the calendar before but never with the submission deadlines in pink. When did they show up and where? Is there something similar for P&Z Meetings (with submission deadlines)? How does the public find these things?

Here is the only BOS calendar I have ever come across: <https://www.cochise.az.gov/DocumentCenter/View/24278/2026-Board-of-Supervisors-Meeting-Schedule-Paydays-County-Holidays-PDF>

On Thursday, March 26, 2026 at 04:25:34 PM MDT, McLachlan, Christine <cmclachlan@cochise.az.gov> wrote:

Here is a link - the dates in pink are the submission dates/cutoff deadlines:
<https://www.cochise.az.gov/DocumentCenter/View/24279/2026-Board-of-Supervisors-Meeting-Deadlines-PDF>

Christine McLachlan, AICP
Director
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cmclachlan@cochise.az.gov

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From: Ali Morse <morseali2@yahoo.com>
Sent: Thursday, March 26, 2026 2:40 PM
To: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Subject: Re: public comments

CAUTION: EXTERNAL EMAIL*

Hello again, Ms. McLachlan,

Can you please tell me where the deadline is posted for comments? I am not able to find it on the county website.

Thank you,

Ali

On Thursday, March 26, 2026 at 01:50:03 PM MDT, McLachlan, Christine <cmclachlan@cochise.az.gov> wrote:

Thanks! My deadline for the 4/7 meeting submittals is tomorrow (3/27). That deadline is intended to give everyone in the internal review route, which includes the county attorney and BOS staff, sufficient time to review and compile the info for the meeting.

Christine McLachlan, AICP

Director

Cochise County, Development Services

1415 Melody Lane, Building F

Bisbee, AZ 85603

520-432-9266

cmclachlan@cochise.az.gov

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From: Ali Morse <morseali2@yahoo.com>

Sent: Wednesday, March 25, 2026 10:44 PM

To: McLachlan, Christine <CMcLachlan@cochise.az.gov>

Subject: Re: public comments

CAUTION: EXTERNAL EMAIL*

Welcome back, Ms. McLachlan, and I hope you were able to enjoy your vacation without thinking about work!

You mention a publishing deadline in your first highlighted comment below. What and when exactly is the publishing deadline? Seven days prior to the BOS meeting? 10 days prior? Just want to make sure any more comments I submit will be included in the BOS packet for the 4/7 meeting.

Thank you,

Ali

On Thursday, March 12, 2026 at 10:00:59 AM MDT, McLachlan, Christine <cmclachlan@cochise.az.gov> wrote:

Good morning, thank you for your comments, my responses are in highlight.

When you say "attach to the board memo" does that mean it will be publicly posted to the agenda item for the next BOS mtg? **Yes – all comments received prior to the publishing deadline will be attached.**

I was disappointed that the P&Z Commissioners only received a fraction of letters that your office received. Was it not possible to update the list on Monday or yesterday, prior to the meeting? **Public comments often continue arriving right up to and during the meeting, so materials must be compiled at a specific cutoff time in order to prepare packets for the Commission. The version provided to P&Z reflected the comments received before the packet deadline – typically one week prior to the meeting. In this case I extended it to the Friday before. Additional comments that came in later were printed and provided to the Chair and summarized during the presentation. All**

comments received, including those after the packet deadline, will be included in the Board of Supervisors memo and made part of the public record for their consideration.

Will the Public Comments document for yesterday's meeting be updated for the public and P&Z Commissioners to read in full? All comments received prior to the cut-off date for the BOS memo (10-days prior to the meeting) will be attached for the Board's consideration, including everything I have received in connection to the commission hearing.

When does the board vote on the moratorium--at their 3/24 mtg or their 4/7 mtg? This will need to be discussed internally before the item is scheduled. Once the item is placed on a Board of Supervisors agenda, the meeting date will be posted publicly with the agenda materials.

What happens to the input residents have made to adjust the language of the bill? I know the Chiricahua Regional Council submitted some suggestions. All public comments received are part of the public record and are provided to the Board of Supervisors for consideration. The Board may choose to adopt the ordinance as drafted, modify the language, or provide direction for additional revisions based on public input and policy considerations.

Is this process not like the Comprehensive Plan, for which public comment was welcome and considered? Public comment is welcomed and accepted as part of the zoning amendment hearing process.

Christine McLachlan, AICP

Director

Cochise County, Development Services

1415 Melody Lane, Building F

Bisbee, AZ 85603

520-432-9266

cmclachlan@cochise.az.gov

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www.cochise.az.gov

GIS Online: [INFOMap](#)

Apply for a permit online: [CITIZEN SERVE](#)

From: Ali Morse <morseali2@yahoo.com>
Sent: Thursday, March 12, 2026 6:07 AM
To: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Subject: Re: public comments

CAUTION: EXTERNAL EMAIL*

Good morning,

When you say "attach to the board memo" does that mean it will be publicly posted to the agenda item for the next BOS mtg?

I was disappointed that the P&Z Commissioners only received a fraction of letters that your office received. Was it not possible to update the list on Monday or yesterday, prior to the meeting?

Will the Public Comments document for yesterday's meeting be updated for the public and P&Z Commissioners to read in full?

When does the board vote on the moratorium--at their 3/24 mtg or their 4/7 mtg?

What happens to the input residents have made to adjust the language of the bill? I know the Chiricahua Regional Council submitted some suggestions.

Is this process not like the Comprehensive Plan, for which public comment was welcome and considered?

Thank you in advance for your time,

Ali

On Wednesday, March 11, 2026 at 03:27:42 PM MDT, McLachlan, Christine <cmclachlan@cochise.az.gov> wrote:

I've gotten many responses since the posting of the agenda, and I will probably continue to get them until the meeting time. The late responses will be printed for the chair. We will save them in the project file and attach them to the board memo, along with any responses we receive prior to the next public hearing. I will also summarize the comments in my presentation.

Christine McLachlan, AICP

Director

Cochise County, Development Services
1415 Melody Lane, Building F
Bisbee, AZ 85603
520-432-9266
cmclachlan@cochise.az.gov

Public Programs...Personal Service

www.cochise.az.gov

GIS Online: [INFOMap](#)

Apply for a permit online: [CITIZEN SERVE](#)

From: Ali Morse <morseali2@yahoo.com>
Sent: Wednesday, March 11, 2026 2:19 PM
To: McLachlan, Christine <CMcLachlan@cochise.az.gov>
Subject: public comments

CAUTION: EXTERNAL EMAIL*

Dear Ms. McLachlan,

It does not appear that the 39-page document labeled "Public Comments" has been updated since last Friday. I am pretty sure there have been more since then but have no idea how many. Can you please ensure that the P&Z Commission has access to all comments submitted for the data center issue before they vote on the regulations today?

Thank you,

Ali

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March 23, 2026

Mr. Matthew Taylor
Cochise County Development Services
1415 Melody Lane, Building F
Bisbee, Arizona 85603

Electronically submitted to: MTaylor@cochise.az.gov

RE: SU26-04 Winchester III Solar

Dear Mr. Taylor:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the proposed Winchester III Solar project. The Department understands that Torch Clean Energy (Torch) proposes to construct a 200 MW photovoltaic (PV) solar facility with a battery energy storage system (BESS) and associated infrastructure on approximately 1,250 acres of private land 7 miles southwest of the town of Willcox, in Cochise County, Arizona. The facility would be located adjacent to the north boundary of the approved Winchester Solar II project, which began construction in January 2026, between the Winchester Mountains and the Willcox playa, in primarily undeveloped semi desert grassland and Chihuahuan desert scrub habitat.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. 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.

The Department recognizes the importance of planning efforts to develop renewable energy locations that contribute to regional and state economic growth needs and would like to work closely with Torch during the planning and development of this facility. The Department further recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and wildlife related recreational access during development and operation of the facilities. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and wildlife related recreation.

ARIZONA
azgfd.gov | 520.628.5376

TUCSON OFFICE: 555 N. GREASEWOOD ROAD, TUCSON AZ 85745

Arizona has recently seen an increase in the number of proposed and in-development renewable energy generation projects and associated infrastructure. A number of energy projects have been built or proposed within the vicinity of this project. Although each of these projects individually may have a minimal impact on the broader landscape, these projects cumulatively could result in loss of habitat, impact wildlife movements, and affect wildlife-related recreation. Additionally, long-term effects to wildlife can extend several kilometers beyond the footprint of a solar project area ([Sawyer et al. 2025](#)¹). It is important to consider all potential cumulative effects and to evaluate this project in association with other projects in the area. Department staff are available to assist in identifying potential cumulative impacts to wildlife and associated voluntary conservation measures that can be implemented for the project.

The proposed project occurs within two miles of the [Willcox Playa/Cochise Lakes Important Bird Area](#)² (IBA). The Willcox Playa/Cochise Lakes area is of state and regional significance and serves as an important overwintering ground for sandhill cranes and numerous other avian species, including several shorebirds. Sandhill cranes are present on the playa between October and March and fly between roosting and feeding sites several times a day. The Department would welcome the opportunity to explore conservation measures with Torch that aim to reduce potential impacts to cranes and other avian species, such as the following:

- The Department encourages the use of both bird diverters and near-ultraviolet light Avian Collision Avoidance Systems (ACAS) on any new power lines needed for this project (e.g. lines over water bodies or in the path of colonial roosting locations). New power lines in this area may pose a risk of collision and mortality for cranes and other large birds. Providing a combination of bird diverters (or floppy tags), which are useful in daytime/full light scenarios, and near-ultraviolet ACAS, which are useful in nighttime/low light scenarios, can significantly reduce the occurrence of crane strikes ([Dwyer et al. 2019](#)³). The Department also recommends following the Avian Power Line Interaction Committee (APLIC) guidelines for new power lines, which can be found in the current version of [Suggested Practices for Avian Protection on Power Lines and Reduced Avian Collisions with Power Lines](#)⁴. The Department's Raptor Coordinator, can be contacted at raptors@azgfd.gov or 623-236-7575, can provide further information on specific design features and best management practices.
- The "lake effect" hypothesis suggests that some birds are attracted to photovoltaic solar facilities because polarized light reflected from the panels can mimic the appearance of water, causing birds to attempt to land on or near the arrays. Fatalities of avian species have been recorded across utility-scale photovoltaic solar facilities in the Southwest U.S. ([Kagan et al. 2014](#); [Kosciuch et al. 2020](#)). The extent at which the lake effect occurs is believed to be species-specific and context dependent, with research showing fatalities of some aquatic habitat birds at solar facilities in arid environments due to collisions with the panels or the inability of some species to take off from the site in the absence of water ([Diehl et al. 2024](#); [Kosciush et al. 2021](#)). The Department encourages Torch to consider

¹ <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1002/2688-8319.70071>

² https://aziba.org/?page_id=712

³ https://www.researchgate.net/publication/333903783_Near-ultraviolet_light_reduced_Sandhill_Crane_collisions_with_a_power_line_by_98

⁴ <https://www.aplic.org/documents>

implementing post-construction monitoring for avian injuries and fatalities. Recommendations for monitoring design and frequency can be found in the U.S. Geological Survey's 2016 [Mortality Monitoring Design for Utility-Scale Solar Power Facilities](#)⁵. Any avian injuries or fatalities should be reported both to the Department and by using the U.S. Fish and Wildlife Service's [Injury and Mortality Reporting](#)⁶ website. Department staff are available to assist in developing the monitoring protocol and to further refine the monitoring and reporting recommendations in order to develop feasible and repeatable protocols to be implemented during operations.

The Department recommends conducting surveys in the project area to determine species presence. These surveys should be of sufficient duration and intensity to adequately assess all habitat types and potential wildlife species occurrence in and adjacent to the project area. Department staff are available to assist Torch in determining appropriate surveys to conduct as well as recommend design features and best management practices that can help minimize potential impacts. Based on the information provided, the Department offers the following recommendations to reduce potential impacts to wildlife and habitat; additional information can be found in *Guidelines for Solar Development in Arizona* which can be found on the Department's [Wildlife Friendly Guidelines page](#)⁷.

- The western burrowing owl, a special status species that is regulated under the Migratory Bird Treaty Act (MBTA), has the potential to occur in the project area. The Department recommends conducting occupancy surveys for this species in advance of the design phase to understand distribution of burrowing owls in the project site; avoidance of a large burrowing owl population may be advisable over removal or other conservation measures. Guidelines for conducting this survey are found in [Burrowing Owl Project Clearance Guidance for Landowners](#)⁸. Please note that the survey should be conducted by a surveyor who is certified by the Department or has similar training and qualifications. If burrowing owls cannot be avoided through project design or an active burrowing owl burrow is detected, please contact the Department for conservation measures that can be implemented to minimize impacts on this species
- The Department also recommends conducting surveys for nesting birds prior to vegetation removal and/or construction activities that occur during the breeding season. The vegetation within the project area may provide nesting opportunities for avian species that are regulated under the Migratory Bird Treaty Act (MBTA).
 - The Bendire's thrasher and the LeConte's thrashers are special status species that are also regulated under the MBTA and have the potential to occur within the project area. The Department recommends following the DTWG's Clearance Survey Protocol if project activities occur between March 15th and June 30th. Please reference the Desert Thrashers Working Group (DTWG)'s [Conservation of Bendire's and LeConte's Thrashers at Solar Development Sites](#)⁹ for the protocol.

⁵ <https://pubs.usgs.gov/of/2016/1087/ofr20161087.pdf>

⁶ <https://ecos.fws.gov/imr/welcome>

⁷ <https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/>

⁸ https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/nongame/eagles/BurrowingOwlClearanceProtocol_2009.pdf

⁹ <https://borderlandsbirds.org/wp-content/uploads/2024/09/Desert-Thrasher-Solar-Recommendations-1.0.pdf>

- Burrowing species could occur within the project area and could be influenced by construction activities and by loss of habitat. Surveys for these species are recommended to determine their presence and to inform pre-construction activities. Department staff are available to assist in identifying suitable conservation measures, such as one-way enclosures on burrows that allow wildlife to exit the burrows and disperse to adjacent lands in advance of construction.

Maintaining habitat connectivity is a priority for the Department, and wildlife movement corridors are important for wildlife to respond to changing environmental conditions. The landscape in which this project is proposed provides important movement pathways for wildlife. The Department is available to meet with the Torch to discuss opportunities to incorporate wildlife connectivity into the project design, including the following:

- The Department recommends incorporating open corridors across the project area into the project design to facilitate wildlife movement, including within upland habitats as well as maintaining the washes that occur in the project area in their natural state without fencing or other barriers to wildlife movement. These washes serve multiple functions in the ecosystem, including landscape-level conveyance corridors for wildlife movement. The Department generally recommends a minimum corridor width of approximately 1,300 feet, or as wide a corridor as is feasible for the project. The Department would like to discuss the following potential design features in further detail with the developer:
 - Creating wildlife movement pathways by splitting large panel arrays apart to allow for space between the arrays. For this method, fencing would be erected around each array instead of the entire facility.
 - “Rounding” or “Cutting” corners off panel arrays by removing select panels, especially in known corridors and where project footprints are narrowest, to enhance wildlife permeability.
- The Department recommends maintaining a minimum setback of 200 feet from ephemeral washes and ¼ mile from perennial waters.
- The Department’s [*Wildlife Compatible Fencing Guidelines*](#)¹⁰ provide information on how fencing impacts wildlife, ways to design fencing to prevent wildlife entanglement and impalement, and to ensure wildlife movement is not restricted. Department personnel are available to help determine appropriate fencing design and layout that will achieve its objective while reducing impact on wildlife, such as leaving a 6–8-inch gap between the ground surface and bottom of the fence to allow for smaller wildlife species to move freely through the area and make use of any habitat within the project boundary.
- The Department recommends conducting minimal grading in the project area and, to the extent possible, retaining habitat features underneath the panels, including vegetation and soils. The topography in the majority of the site is flat and may require minimal trimming of shrubs and existing vegetation to install the panels. Keeping the existing soil and root structures intact would serve to minimize erosional run-off and help reduce biodiversity loss within the site ([*Grodsky and Hernandez 2020*](#)¹¹).

¹⁰ https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125_AGFD_fencing_guidelines.pdf

¹¹ <https://www.nature.com/articles/s41893-020-0574-x>

Finally, the Department offers the following general recommendations to reduce potential impacts to wildlife and habitat during construction and operation of the facility:

- A variety of other Arizona Species of Greatest Conservation Need (SGCN) have the potential to occur within the project area. If wildlife are encountered during project activities, the Department recommends moving them out of harm's way, no more than 0.25 mile outside the project boundary within similar habitat. Please note that the Department has an interactive website, [Arizona Wildlife Conservation Strategy](#)¹², that includes the most recent list of SGCN to help navigate and identify conservation opportunities.
- If trenching or digging of large holes will occur, the Department recommends that trenching/digging and backfilling crews work together to minimize the number of open holes/trenches at any given time. Where trenches/holes cannot be backfilled immediately, the Department recommends escape ramps be constructed in each hole and at least every 300 feet in trenches. Escape ramps can be short lateral trenches or wooden planks sloping to the surface, ramp slopes should be less than 45 degrees (1:1). Trenches or holes that have been left open should be inspected for animals and animals removed prior to backfilling.
- 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 ([Davies et. al. 2013](#)¹³). The Department recommends using only the minimum amount of light needed for safety. The Department encourages the use of motion sensing lighting and “warmer” narrow spectrum lighting (amber, orange, red) which is 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.
- The information provided indicates that the project may include drainage improvements such as check dams or spreader weirs on the upstream side of the project and on site retention, as needed. Department staff remain available to assist in identifying potential impacts to wildlife and conservation measures to minimize potential impacts during development or construction of erosion structures. As an example, rip-rap is difficult for many species to traverse. If rip-rap is required for the construction of on-site retention basins or large-scale drainage needs, burying and back-filling with topsoil or other substrate would allow wildlife to move through the basins.
- Please ensure the project complies with [Arizona Native Plant Law](#)¹⁴ regulations. A Native Plant Inventory may need to be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under the Arizona Native Plant Law.
- To minimize the potential introduction or spread of exotic invasive species, the Department encourages taking precautions to wash and/or decontaminate equipment before entering and leaving the site. See the [Arizona Department of Agriculture website](#)¹⁵ for a list of prohibited and restricted noxious weeds and the [Arizona Native Plant Society](#)

¹² <https://awcs.azgfd.com>

¹³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3657119>

¹⁴ <https://agriculture.az.gov/plantsproduce/native-plants>

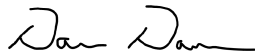
¹⁵ <https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds>

¹⁶ for recommendations on control methods. To view a list of documented invasive species or to report invasive species in or near the project area, visit [iMapInvasives](#)¹⁷, which is a national cloud-based application for tracking and managing invasive species.

- Stinknet is a highly invasive noxious winter weed native to South Africa, and is extremely flammable when dry. Stinknet (also known as globe chamomile) has heavily infested adjacent counties. Infestations spread rapidly along highways and open fields in residential areas, with emergence starting in late November and plants continuing to germinate and emerge through May in wet years. In order to minimize the spread of this plant it is critical that any new infestations are identified and quickly managed. Additional information is available through the [Southwest Vegetation Management Association](#)¹⁸, the [Sonoran Desert Cooperative Weed Management Area](#)¹⁹, or the [Arizona Native Plant Society](#)²⁰.
- The Department recommends revegetating disturbed areas with native drought-tolerant species that represent the natural surrounding landscape. Landscaping with native plants can help support wildlife and pollinator species in the area while reducing dust and erosion. In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts.

Thank you for the opportunity to provide input on the Winchester III Solar project. For further coordination, please contact Katie Matthiesen at Kmatthiesen@azgfd.gov or 520-359-7073.

Sincerely,



Dave Daniels,
Regional Supervisor, Region 5

Cc: Callie Cavalcant - Habitat, Evaluation and Lands Branch Chief, AZGFD

AZGFD #M26-03102725

¹⁶ <https://aznps.com/invas>

¹⁷ <https://imap.natureserve.org/imap/services/page/map.html>

¹⁸ <https://www.swvma.org/>

¹⁹ <https://www.sdcwma.org/species/stinknet.php>

²⁰ <http://aznps.com>