

May 24, 2021

Box Canyon Solar Project

Located west of State Route 79; north of Arizona Farms Road

Major Comprehensive Plan Amendment

Major Comprehensive Plan Amendment

for

Box Canyon Solar Project

May 24, 2021

Owner	Arizona State Land Department Attn: Jon Froke, AICP Planning and Engineering Division jfroke@azland.gov 602-542-3126
Applicant	BOCA bn, LLC Attn: Erik Ellis, Vice President, Project Development BrightNight, LLC Email: erik@brightnightenergy.com 602-549-4243
Legal Counsel	Rose Law Group 7144 E Stetson Dr, Ste 300 Scottsdale, AZ 85251 Attn: Court Rich Email: crich@roselawgroup.com Email: jhall@roselawgroup.com 480-505-3938
Planning/Civil Engineering	Environmental Planning Group, A Terracon Company 4685 S. Ash Ave., Suite H-4 Tempe, AZ 85282 Attn: Mickey Siegel Email: msiegel@epgllc.co (623) 244-3622 Dibble Engineering 1640 South Stapley Drive, Suite 120 Mesa, Arizona 85204 Attn: Kent E. Norcross, PE Email: Kent.Norcross@dibblecorp.com 480-757-7876

**NARRATIVE REPORT
FOR
BOX CANYON SOLAR
COMPREHENSIVE PLAN AMENDMENT**

BACKGROUND/INTRODUCTION

This narrative report is being submitted on behalf of BOCA bn, LLC (the Applicant, or BOCA) to provide information to support their request for a Major Comprehensive Plan Amendment (MCPA)¹ for the Box Canyon Solar Project (Project). BOCA is a subsidiary of BNC Devco, LLC, which is a joint venture between BrightNight and Cordelio Power. BrightNight is the lead developer for this project.

BrightNight and Cordelio Power are excited to bring Pinal County this state-of-the-art project that combines clean renewable solar energy generation with advanced battery storage technology to harnesses the power of the sun, even after it sets. This project has numerous direct benefits to Pinal County in addition to the fact that it uses renewable resources to generate clean energy without the use of water in the generation. We estimate the fully completed project will provide Pinal County with greater than \$20 million in business property taxes while generating over \$60 million in payments for the benefit of our state’s schools via money paid to the Arizona State Land Department (ASLD). The Project is ideally located and puts to beneficial use property that would otherwise almost certainly sit unused for several more decades. Further, the Project will create hundreds of jobs during construction and trigger significant local spending and secondary benefits to the local economy. Finally, this project will help further Pinal County’s growing reputation as a national leader in the new and expanding clean energy economy and goes hand in hand with the County’s significant positioning as a leader in electric vehicle manufacturing and clean energy generation and infrastructure.

The Project site is approximately 2,329 acres within unincorporated Pinal County, on Arizona State Trust Lands managed by ASLD. The site is approximately 4.6 miles east of the Salt River Project Abel Substation, 9 miles north of Florence, 5.6 miles south of State Route (SR) 60, and directly adjacent to and west of SR 79. The parcels are directly accessible via SR 79. The southern boundary of the site is approximately 1 mile north of Arizona Farms Road and 1 mile east of Helseth Road. Access to Interstate 10 is about 35 miles east of the Project site via SR 287/87.

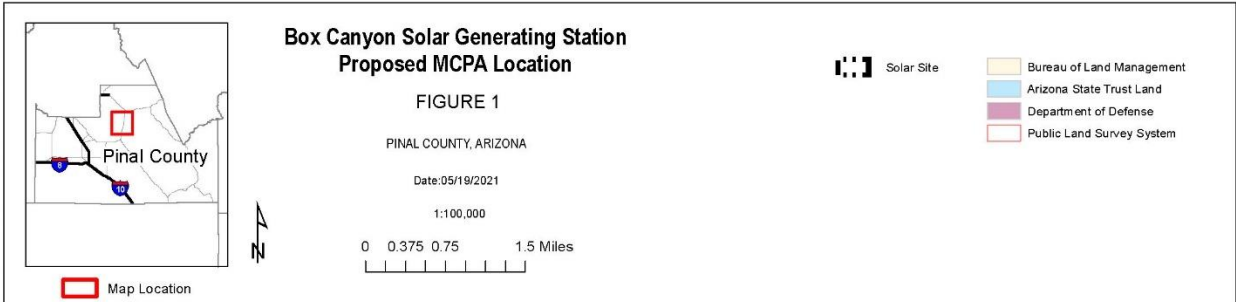
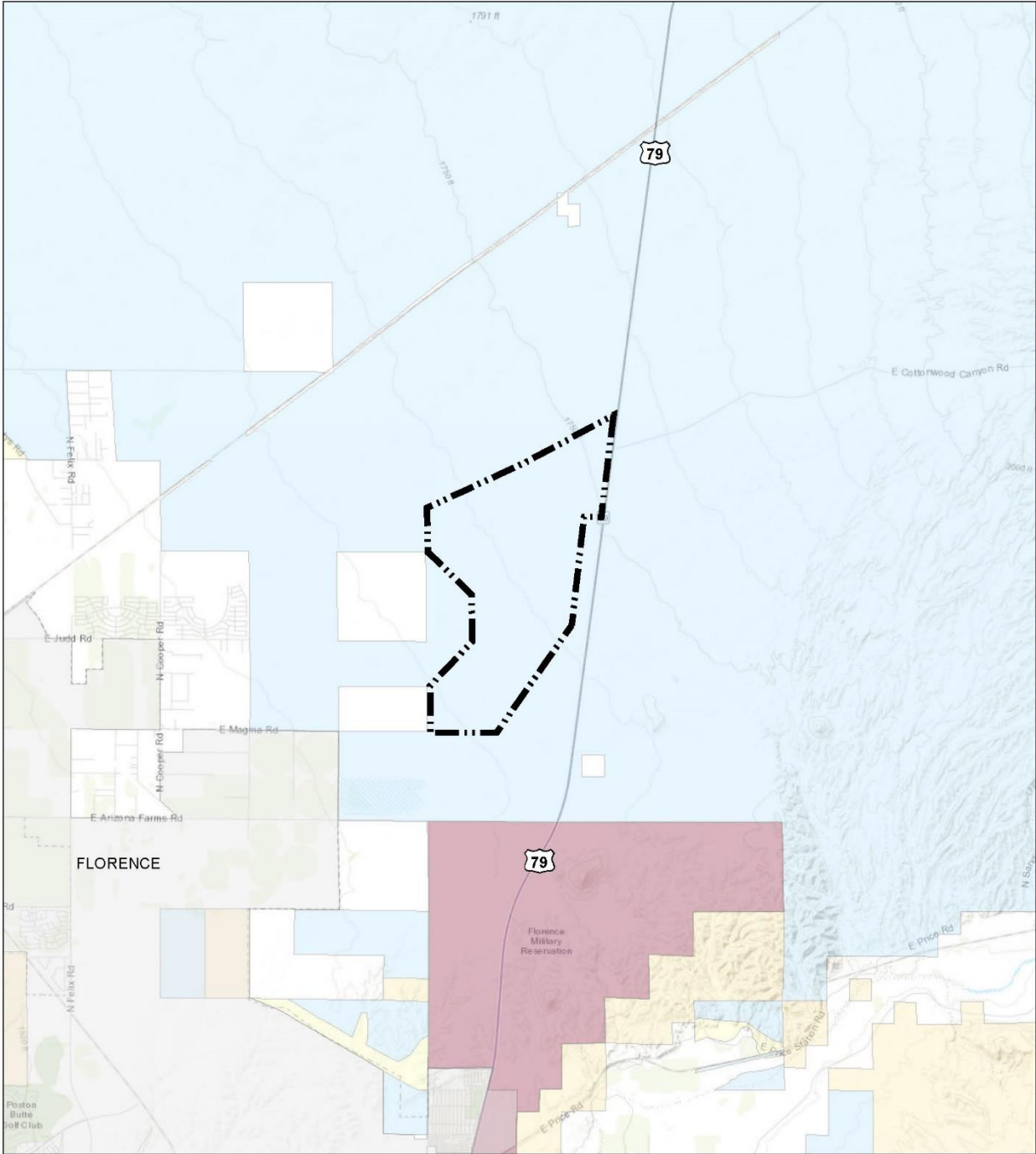
The site is currently undeveloped vacant state land and is surrounded by the following uses:

- **North:** vacant state land
- **East:** SR 79
- **South:** vacant state land
- **West:** vacant state land and a 2004 Planned Area Development that was never developed

The proposed use will allow development of up to 300-megawatt (MW) photovoltaic (PV) solar energy facility with battery energy storage to be located on approximately 2,329 acres of State Trust Land adjacent to SR 79 (Figure 1).

¹**Existing Comprehensive Plan:** Moderate Low Density Residential (MDLR 1-3.5 dwelling units per acre [du/a]) and High Intensity Activity Center

Proposed Comprehensive Plan: Green Energy Production and High Intensity Activity Center



To support the development of the Project, BOCA requests Pinal County amend the Comprehensive Plan to change the land use designation on the site from Moderate Low Density Residential (1-3.5 du/ac) and High Intensity Activity Center to Green Energy Production. Pinal County designates Green Energy Production areas specifically for the location of large scale PV solar generation facilities similar to this request.

The Applicant will be submitting a rezoning request to amend the zoning district on the property from existing General Rural (GR) to Industrial (I-3) with a Planned Area Development (PAD) overlay. This will allow the proposed solar energy facility with battery energy storage to operate.

It is estimated this Project will bring approximately 250 new construction jobs to Pinal County. The anticipated timing for construction of the Project is to meet a commercial operation date starting as early as May 31, 2023.

PROPERTY DESCRIPTION

The Project site is located within unincorporated Pinal County and is currently undeveloped vacant land characterized by typical Sonoran Desert vegetation. The subject parcels are owned by Arizona State Trust Land, and the Applicant will be leasing the lands from ASLD.

Pinal County Assessor identifies the property as follows:

- Portions of Parcel #s 210-33-7000 and 201-01-7000; specifically, portions of Sections 7, 8, 17, 18, 19, and 30 in T3S R10E and Sections 13, 24, and 25 in T3S R9E

A Commercial Lease Application for the subject parcels has been filed with ASLD (No. 03-121564), and ASLD has issued a letter of authorization to the Applicant to begin the entitlement process and perform any and all necessary studies on the property, including surveys on the site.

As previously mentioned, the Comprehensive Plan currently designates the property as Moderate Low Density Residential (1-3.5 du/acre) and High Intensity Activity Center along SR 79. The Applicant intends to design the solar energy facility to maintain the key portions of the activity center along the transportation corridors. This plan will enable high intensity uses to be developed along the highway while recognizing that any type of “high intensity” activity in this area is decades away.

Additionally, the Applicant will be requesting to change the existing zoning district from GR to I-3 with a PAD to permit the proposed operation as a solar generation facility with battery storage.

As discussed with the Pinal County planning and zoning department, the ALTA survey for the project will be provided following the completion of the Class III cultural resources survey, which commenced in April 2021. The Class III survey results will be used to determine the final ALTA survey boundaries, to be able to exclude any culturally sensitive areas. Completion of the ALTA survey is expected within 4 to 8 weeks of this application’s filing date and will be provided at that time.

CURRENT LAND USE / SITE CONDITIONS

The site has ideal topography for the proposed use as a solar farm. The terrain is mostly flat topography (Figure 2) with a gradual slope; specifically, the northeast portions of site have higher elevation than the southwest portions. The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer web viewer was accessed on April 27, 2021. The site is within FEMA-designated flood zones A and X. Most of the site is within Zone X, an area of minimal flood hazard determined to be outside the 500-year flood zone. Several washes traverse and drain the site from the northeast to southwest and are designated Zone A. Zone A areas are defined as subject to inundation by the 1-percent-annual-chance flood event, or 100-year flood zone. A floodplain use permit would be required for any development within the Zone A areas; however, at this time no development is being considered in these areas. The proposed solar fields will be designed to avoid these washes entirely, and the Applicant's team will work closely with the Pinal County Flood Control Section to ensure there are no issues.

Primary access to the Project site would be at SR 79 along the eastern boundary of the site. The Plan identifies the SR 79 Corridor as an area that requires specific design and development strategies to preserve its character. The corridor is known for its Sonoran Desert environment, which will be protected as much as possible with this project. As required by Pinal County, the solar farm will be accessed by a paved, all-weather drive that connects to SR 79. The plan also protects the future corridor for Bella Vista Road by preserving the right-of-way and setting back from this corridor. While the Project will create very low traffic volume once constructed, the Applicant will work with the County and Arizona Department of Transportation to implement whatever improvements may be needed to SR 79 as a result of the Project.

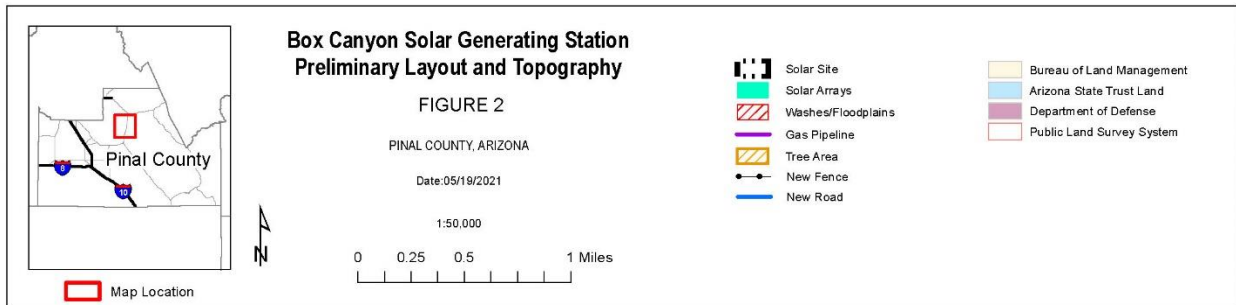
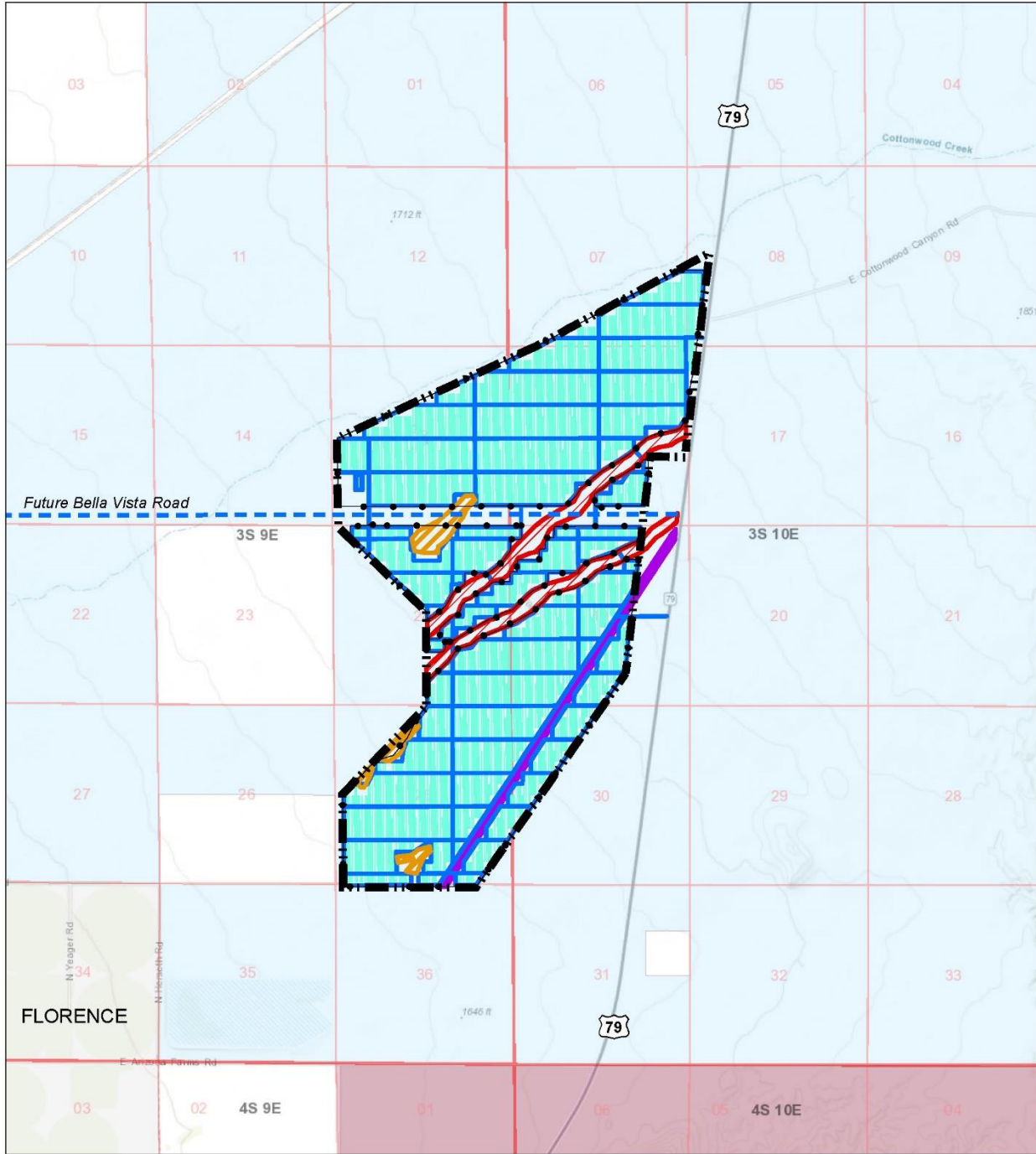
A natural gas pipeline bisects the Project site diagonally through sections 19 and 30 in Township 3 North Range 10 East and section 25 in Township 3 North Range 9 East. There are no other existing roads or utility easements crossing the site.

PROJECT DETAILS

The proposed use of the site is the construction and long-term operation (approximately 30 years) of a 300 MW solar PV generation plant with up to 300 MW of battery storage. The Project will operate year-round harvesting Arizona's plentiful sun rays that will be utilized as an organic energy source. The Applicant anticipates the Project will generate more than 350,000 annual MW hours of renewable energy, which is equivalent to the amount of energy consumed by more than 50,000 homes in Pinal County each year.

The primary components of the Project include:

- Weather monitoring equipment
- Solar PV modules mounted on a single-axis tracking system
- Electrical collection systems, including PV-combining switchgear, power conversion stations, inverters, transformers, and collection lines
- Substation
- Battery Energy Storage System (BESS)
- A possible operation and maintenance (O&M) building
- Associated civil infrastructure including fencing, access driveways and gates, on-site parking, stormwater management systems, and signage.



The main project components are described in the sections below, and Figure 2 shows a conceptual layout for the Project.

Solar Field and Generation System

The PV modules will convert sunlight directly into electricity. Much of the site would be covered by anti-reflective PV modules mounted on single-axis tracking systems. These systems move the panels to track the sun across the sky.

The tallest part of the solar array is expected to be approximately 12 feet high. The solar farm will be located on vacant, undeveloped ASLD land within the County and is surrounded by other vacant unimproved land. There will be absolutely no negative impact from the proposed use on the surrounding properties. The solar farm generates extremely low traffic and does not create any noise or odor. The tallest part of the solar array is expected to be approximately 12 feet high, which will have no significant impact on the surrounding properties.

The energy generated by the solar arrays is routed to power conversion stations via a direct current (DC) collection system of underground DC cabling and combiner boxes. From the power conversion station locations, the generated power will flow through a medium voltage (34.5-kilovolt [kV]) collection system to the Project Substation that will include a voltage step-up transformer, breakers, other associated substation equipment, meteorological stations, and telecommunications equipment. At the Project Substation, the voltage will be increased to 230 kV that will be transmitted to the electrical grid where it can ultimately be consumed by residents of Pinal County.

In addition to the structures associated with the solar field, the Project could include an O&M building and control house adjacent to the Project Substation. The O&M building would house maintenance staff workspace, equipment, and documents, and the control house would store protective relay and communications equipment. The O&M building and control house are currently planned to be approximately 1,200 square feet each. During operations, the O&M building would have potable water and possibly a septic system. The design and construction of the buildings and solar arrays will be consistent with County building standards.

As required by Pinal County, the Project will be designed with the appropriate setbacks and or wall/fencing from any adjacent residential zoning. Fencing and/or walls will be installed along project boundaries in accordance with federal regulations for energy facilities, and any County setback requirements.

Battery Energy Storage System

The BESS would be designed to supply energy each day after the solar field stops generating power. The BESS will allow the Project to take the large amount of solar energy generated during the middle of the day and discharge it in the evening to meet the highest energy demand of local and nearby Pinal County residents.

The BESS would be housed in a series of buildings or storage containers composed of batteries and inverters (battery modules in trays that fit into racks). The batteries would be controlled by a battery management system, which both monitors their condition and performance and allows for their control. They would be monitored 24 hours a day, 7 days a week.

The BESS will meet all applicable codes, and will include an electronic security system, smoke detectors, emergency pressure relief system, thermal management system, and other critical safety infrastructure for safe operation of the batteries. Equipment, such as transformers, shall have a containment lip around the foundation to contain any accidental spills. The climate control system will keep the batteries running at optimal and safe temperatures to maximize performance and longevity. Should the air conditioning units fail, the batteries and their control systems have redundant mechanisms to shut down the batteries and isolate them from the electrical grid. The BESS will be designed to meet and exceed all applicable life safety codes.

Grading and Drainage

As previously mentioned, the proposed site is located on level land that would require little to no grading for the construction of the Project. The soil surface will be smoothed and compacted to prepare the site for installation of the solar panels using earth-moving equipment. The Applicant will provide Pinal County with the necessary drainage statements and/or reports.

Temporary erosion and sediment control measures will be utilized during construction, and permanent stormwater management features will be used during operation of the facility. Temporary facilities could include sediment traps or basins, geotextile silt fences, and straw bale check dams in ditches.

The site drainage plan shall be in accordance with the current Pinal County Drainage Ordinance and Manual as well as the requirements of the stormwater regulations administered by Arizona Department of Environmental Quality.

Site Access/Traffic and Circulation

Primary access to the Project site will be provided directly from SR 79. Once constructed, the site will generate very low volume traffic.

A paved, all-weather public access road is required and will be installed to connect the Box Canyon Solar site to SR 79. The access road will be designed to accommodate two-way traffic.

A Traffic Impact Assessment will be conducted per the current Pinal County Traffic Impact Assessment Guidelines & Procedures. The preparer of the Traffic Impact Assessment will contact the Pinal County Traffic Engineering Section to discuss the scope of the assessment, methodology, level of detail required for the specific project and the study limits prior to beginning the analysis.

Water Use

The solar and battery energy storage uses require very little water. The Project will use water during construction and only a relatively small amount of water during the ongoing operations. During construction, it is anticipated a non-potable well will be drilled on-site to provide water that will be used to facilitate soil compaction and as needed to control fugitive dust on exposed soils. Potable water during construction would be brought on-site by operational personnel. Portable toilets, a temporary septic system, and/or holding tanks will be used to provide needed sanitary facilities.

During operation, the primary source of water use will be for occasional washing of the solar panels. The O&M building could utilize a septic system. Water for ongoing operational needs could be provided by a well pending water rights availability and local permitting requirements. Alternatively, water could be brought to the site and stored in water tanks.

Fire Protection System

The Project applicant/engineer will obtain the appropriate Fire District's or State Fire Marshal's approval of the water plans prior to County approval. The Project will incorporate the necessary fire protection systems for the solar project and the battery storage systems required by the County. Furthermore, the solar fields will be routinely maintained and kept clear of any vegetation. This will also deter any type of wild brush fire from occurring on the site.

Employment

We estimate the Project will bring approximately 250 jobs to Pinal County by generating employment opportunities both during construction and continued operation of the Project. During construction, the number of workers on the site will vary over the construction period but will average up to approximately 200 each month with a peak of up to 250. After construction, the site will have employees daily and weekly to monitor the solar farm and perform routine maintenance on the panels and related infrastructure.

Lighting System

Because the Project generates power during daylight hours, some routine maintenance could be performed during the night. The Project's lighting system will provide O&M personnel with the minimal amount of illumination necessary for both normal and emergency conditions. Lighting and security could include motion-activated or infrared security lighting and cameras at the Project's perimeter, at O&M buildings, at substations, and at each power conversion station and PV-combing switchgear. Lighting will be designed to provide the minimum illumination needed to achieve safety and security objectives and will be downward facing and shielded to focus illumination on the desired areas only. There will be no lighting in the solar field, so there will be no light spillage onto surrounding properties. If lighting at individual solar panels or other equipment is needed for night maintenance, portable lighting will be used. The Project is surrounded by additional vacant land and SR 79 so there is no illumination impact anticipated.

CONSIDERATION OF COMPREHENSIVE PLAN COMPLIANCE FACTORS

The proposed Project is consistent with many of the goals and objectives of the Plan. The Renewable Energy Sources section of the Plan indicates that Pinal County supports the development of renewable sources to meet energy needs and to reduce the dependence on non-renewable sources. The Plan states: "One very exciting viable renewable energy source in Arizona is solar." The following reviews just some of the goals, policies, and objectives that this project meets and achieves:

- Goal 7.1 – Environmental Stewardship.
- Objective 7.1.1 – Promotion of ecologically responsible development in Pinal.
- Objective 7.1.2 – Improve the County's air quality.
- Goal 7.2 – Protect the long-term water supply for Pinal County.
- Goal 7.3 – Improve the energy efficiency of Pinal County.
- Goal 7.6 – Expand renewable energy in Pinal County.
- Policy 7.6.1.6 – Support the transmission of renewable energy from sources within and outside of Pinal County.
- Objective 7.6.2 – Support the growth of the renewable energy in Pinal County.
- Policy 7.7.2.2 – Support innovative designs for new generating facilities that minimize water use.

Appendix A in the Plan is the Comprehensive Plan Compliance Checklist that ensures conformity of development with the Plan (see Appendix A of this document). Part One of the checklist address consistency with the County's Vision components. Part Two address consistency with Key Concepts.

The Proposed Amendment complies with PART ONE of Pinal County's Vision components as outlined below.

Sense of Community. The proposed Project is consistent with the Sense of Community vision. While the Project will be built in a rural part of the County, the Plan indicates it will be proximate to a Mixed Use, High Intensity Activity Center. As such, there is an opportunity to balance and merge emerging urban centers, rural character, and locally produced clean energy. High Intensity Activity Centers are a mix of professional offices, business parks, and industrial use often in a campus-like setting and may also include high and medium-density residential development.

Mobility and Connectivity. Ensuring Pinal County has adequate transportation corridors and multimodal transportation options is essential. There will be a temporary, minimal increase in traffic volumes on SR 79 due to the work force and materials and equipment delivery during construction, but there will be no significant increase in traffic during the operational life of the Project. The Project will, therefore, have no material impact on mobility and connectivity for the transportation corridors within Pinal County, or the State.

Pinal County is planning for a future extension of Bella Vista Road, east to SR 79, bisecting the proposed Box Canyon Solar site. A 150-foot easement for Bella Vista Road will be reserved of sufficient width to allow for road construction and an intersection at SR 79 in the future.

Economic Sustainability. The Project will expand opportunities for residents to work in the County. We estimate the Project will provide approximately 250 jobs during construction and employ several permanent O&M employees over the roughly 30-year estimated life of the Project. The Project will create quality jobs that provide residents career opportunities.

Further, the Project fits perfectly within Pinal County's growing clean technology space that includes electric vehicle testing and manufacturing and other clean energy generators.

Open Spaces and Places. The Plan states: "Residents value the large connected open spaces and unique places of Pinal County, not only as part of their quality of life, but as an important resource to sustain the region's immense wildlife habitat and their corridors." The proposed Project will be constructed to minimize the loss of open space, avoid natural desert washes and wildlife corridors, and avoid protected cultural resources on the Project site.

Environmental Stewardship. The development of clean renewable energy projects is a benefit to all residents in Pinal County as they replace polluting forms of generation with cleaner options that do not pollute. Adding renewable energy to meet the County's growing energy needs is the perfect way to ensure a clean environment for the future.

Pinal County is a leader in environmental stewardship and rewards and encourages sustainable practices, including water conservation and renewable energy sources. During operation, the Project will use very little water while producing sustainable renewable clean energy for decades.

Healthy, Happy Residents. The proposed Project is consistent with the Healthy, Happy Residents vision. Clean energy helps remove pollution that helps all residents remain healthy, while the jobs and economic development opportunities provided will help increase resources in the County and bring opportunities for greater happiness.

Quality Educational Opportunities. This Project can be made available from time to time to educate residents and local K-12 schools on renewable energy and sustainability. BOCA will work with the local schools to facilitate site visits and provide information that supports the development of curriculum to help expose students to the field of renewable energy, as well as provide information on careers in the field. The Proposed Amendment is consistent with PART TWO of the Comprehensive Plan's Key Concepts as follows:

Land Use Designations. The proposed Project requires an MCPA to change the land use designation of the Project area from Moderate Low Density Residential (1-3.5 du/ac) and High Intensity Activity Center to Green Energy Production. The Green Energy designation indicates areas specifically designated for the "location of large scale photovoltaic solar panel power generation facilities" according to the Plan. The proposed Project complies with the Green Energy land use designation.

Mixed Use Activity Center. While the Project would occur in a rural part of the County, the Plan indicates it will be proximate to a future Mixed Use, High Intensity Activity Center. As such, there is an opportunity to balance and merge emerging urban centers, rural character, and locally produced clean energy. High Intensity Activity Centers are in concept a mix of professional office, business parks, and industrial use often in a campus-like setting, with high and medium density residential to be developed according to future plans. It is highly unlikely that high intense activity uses will develop in this area for many years; however, the Applicant is thoughtfully considering the balance of proposed and future land uses during the design of this Project. The solar facility is being designed around the future activity center to allow for future development.

According to the Plan, one of the Activity Center cores would be centered on the intersection of SR 79 and the future extension of Bella Vista Road. The core of a typical high-intensity activity center is planned for 150 to 200 acres, within a total area of approximately 1,000 acres.² Conceptually, the core would include mostly vertical mixed-use development (ranging up to high-rise with structured parking) with 50 percent basic employment, 20 percent service employment, and 30 percent residential. The core periphery would have a similar mix with a lower density with more service employment, and the outer ring Transition Zone would be limited to mostly horizontal mixed-use development and surface parking.

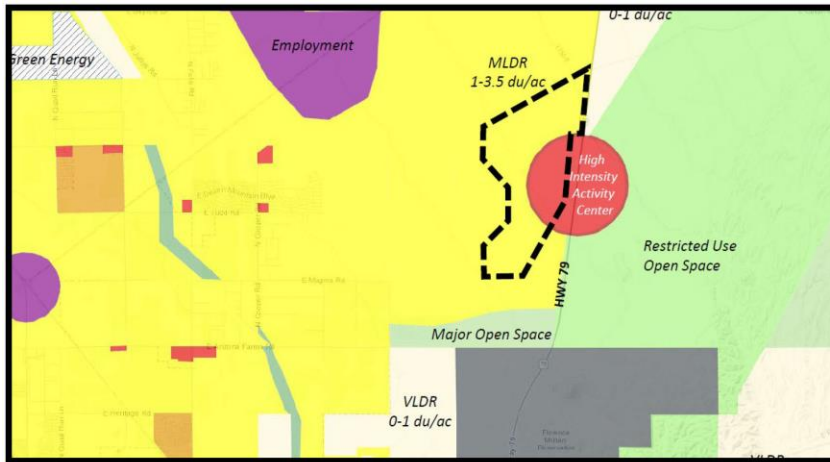
The Box Canyon Solar Project site would be designed to allow a 1,000-foot wide strip of land located along the west side of the highway reserved for future mixed-use development, comprising up to 600 acres to be consistent with the planned Activity Center (Figure 3). The Activity Center Core would accommodate high-density mixed-use development within a ¼-mile zone on the east and west sides of the highway, including a future intersection with the Bella Vista Road extension at SR 79. This allocation of premium road-front property, combined with a comparable allocation on the other (east) side of the highway, would allow an area of more than 1,000 acres for future development within the Activity Center Periphery and Transition zones. Taken together, these areas could accommodate a minimum of 10 million square feet of floor area in single-story buildings along the highway. If it is assumed that about 50 percent of the Core area could be developed, reserving the remainder for infrastructure and open space, more than 4 million square feet of floor area could be accommodated in single-story buildings within the Activity Center Core. Depending on the type of commercial or industrial employment, 4 million square feet could accommodate between 1,600 and 8,000 jobs.³

²Pinal County Comprehensive Plan 2020, p.75

³U.S. Energy Information Administration, Commercial Buildings Energy Consumption Survey, December 2016
<https://www.eia.gov/consumption/commercial/data/2012/bc/pdf/b1-b2.pdf>

Pinal County Major Comprehensive Plan Amendment

Existing Land Use Designations



Proposed Land Use Designation

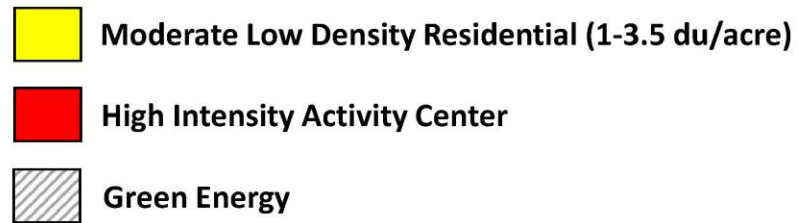
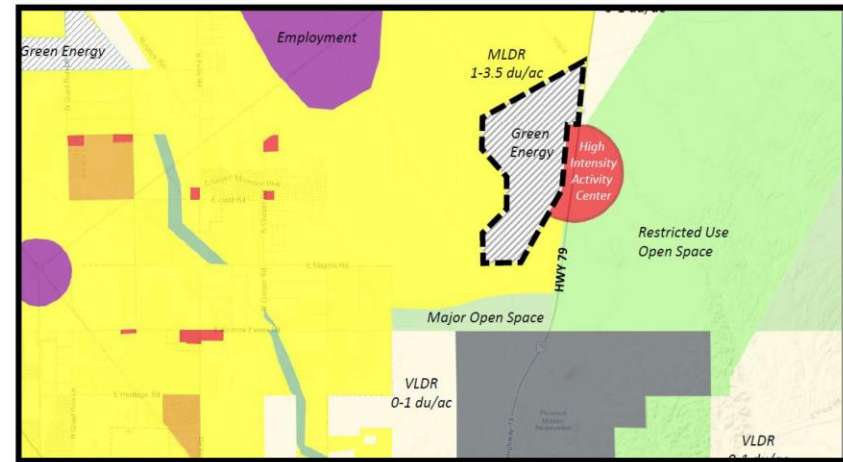


Figure 3 Location of Project in Relation to Comprehensive Plan Amendment

Consistency with the Planning Guidelines described in the Land Use Element. The proposed Project requires an MCPA to change the land use designation of the Project area from Moderate Low Density Residential (1-3.5 du/ac) and High Intense Activity Center to Green Energy Production.

Quality Employment Opportunities County-wide. The Project is expected to provide 250 jobs during construction along with additional jobs for management and maintenance of the completed project.

Viable Agriculture, Equestrian and Rural Lifestyle. The Project will have no negative impact on viable Agriculture, Equestrian, and Rural Lifestyles in this area of the County.

System of Connected Trails and Preservation of Open Space. The Project will preserve natural washes that flow through the land and is consistent with the Pinal County Open Space and Trails Master Plan.

Natural and Cultural Resource Conservation. The Plan strives to protect natural/cultural resources, wildlife corridors and environmentally sensitive areas. Likewise, the Applicant has carefully designed the Project to protect critical wildlife habitat and significant cultural resources in and around the area.

To determine the potential for sensitive biological resources to be present, the Arizona Game and Fish Department Environmental Online Review Tool was accessed on May 18, 2021, to obtain a species report (Appendix B). One federal species of concern, *Athene cunicularia hypugaea* (Western burrowing owl), and one candidate species, *Gopherus morafkai* (Sonoran Desert tortoise), are known to occur within 5 miles of the project vicinity. Field surveys for biological resources will be performed prior to construction, and best management practices will be implemented during construction and operation to minimize disturbance of natural vegetation and wildlife corridors.

A Class III cultural resource survey was conducted within the Project site in the spring of 2021. The results of the survey will be reported to the appropriate agencies prior to construction. If any important archaeological or historic sites are identified that would be potentially impacted by construction, mitigation measures will be implemented as directed by the State Historic Preservation Officer, ASLD, Tribal consultation, and other responsible authorities.

Water Resources, Public Facilities/Services, and Infrastructure Support. The Project would use a minimal amount of water during operation and will not require new public facilities or infrastructure. Water for dust control during construction would be supplied by an on-site well and tank trucks.

Ingress and egress to the Project site for construction and operations will be at SR 79. The access road will be designed and constructed in cooperation with Arizona Department of Transportation and Pinal County engineers to comply with county and state standards, based on vehicle requirements and the results of the traffic study.

APPENDIX A

Comprehensive Plan Compliance Checklist

Appendix A: Comprehensive Plan Compliance Checklist

Purpose:

Provide guidance to ensure conformity of development proposals with the Pinal County Comprehensive Plan.

Intent:

1. Explain how to determine if development proposals are compatible with the Comprehensive Plan.
2. Explain why unique conditions exist to deviate from the Plan.

The Pinal County Comprehensive Plan graphics, Land Use, Circulation (two graphics), and Economic Development, are not intended to be zoning maps that outlines specific locations and parcel-by-parcel determination for land uses and facilities. The Comprehensive Plan's intent is to provide policy direction and a framework for how the Pinal County "development form" or layout should occur over time. It is not the intent to predetermine specifically where land uses must occur. Guidelines within the Land Use element provide direction on development and how it relates to transportation corridors, surrounding land uses, public facilities, and natural environment.

Determination:

Comprehensive Plan Compliance is determined by the development's conformity with the Comprehensive Plan's land use designations (Land Use graphic and Land Use element text) and activity centers (Land Use and Economic Development graphics and Economic Development element text) as well as the goals, objectives, policies and guidelines outlined in the Pinal County Comprehensive Plan. Planning guidelines for each of the land use designations and Activity Centers are also included in the Land Use element. It is important to note that all components and concepts may not apply to every potential proposal.

Organization:

The Compliance Checklist focuses on two major components:

1. Consistency with Pinal County's Vision Components
2. Consistency with the Plan's Key Concepts illustrated on Land Use, Circulation, and Economic Development graphics.

How Is the Checklist Used?

Various concepts are discussed and a "YES" checkbox is provided to indicate if the proposal complies with the key concepts of the Plan.

- If a project complies, it receives a ✓ in the appropriate box.
- If it does not comply, the checkbox will remain blank, and additional information would need to be provided to explain the unique circumstance, if applicable.

- If a project has no relation to a particular check list item, a “non applicable” response is acceptable with a brief explanation.

Who Should Use the Checklist?

Developers, staff, and decision-makers should use the Comprehensive Plan Compliance Checklist.

- ✓ Developers should use this checklist as a guide to the Plan’s policies in the early stages of a development proposal and when submitting an application for review.
- ✓ Staff should use it to review development proposals and to make recommendations to decision-makers. The checklist can assist in developing the staff report.
- ✓ Decision-makers can use the checklist to better understand how well a proposal does or does not comply with the Pinal County Comprehensive Plan.

PART ONE

Consistency with Pinal County’s Vision Components

The Pinal County Comprehensive Plan is a vision-based plan that provides the framework that all decisions related to growth and development are measured against. The following is intended to describe how the proposal meets the various vision components.

Pinal County Vision The County recognizes the importance of the region’s strategic location between the Phoenix and Tucson Metropolitan Areas and its relationship to the overall well-being of the state of Arizona. What happens in Pinal County does not stay in Pinal County; the decisions made here will impact the entire state on many levels: business development, mobility, land management, air quality, water, and overall quality of life. People choose Pinal County for the diverse opportunities it offers; this diversity is what makes Pinal County unique but also represents a challenge as Pinal County continues to grow and change.

Pinal County is a place where history, culture and heritage are the foundation for its future. Pinal County will be seen as a leader in environmental stewardship and conservation practices by ensuring that the natural environment is preserved, yet still available to be discovered. Pinal County provides quality educational and training opportunities placing residents in cutting edge, environmentally-compatible jobs within the County. While communities within Pinal County retain and celebrate their unique qualities, governments and agencies share a collaborative spirit to ensure successes across Pinal County and remain responsive and accountable to their constituents.

Sense of Community—Pinal County is a collection of unique communities, each of which has something special to offer residents and visitors. Balancing emerging urban centers and Pinal County’s rural character is important to residents; ensuring that the threads of Pinal County’s history, heritage, and culture are woven into its future is what makes Pinal County unique from other regions. Ensuring places exist for people to gather and for communities to showcase the diversity of places, people, lifestyles, cultures, and opportunities will help to define Pinal County’s identity.

The proposal:

Is consistent with the **Sense of Community** vision component

Please explain:

Refer to the project narrative

Mobility and Connectivity—Ensuring Pinal County has adequate transportation corridors and a variety of multimodal transportation options addressing all populations is essential for moving goods and people throughout the County and State with minimal affect on Pinal County’s native wildlife. Offering multiple mobility and communication options, to effectively connect communities and activity centers throughout the County, will reduce congestion and improve air quality while enhancing the area’s quality of life.

The proposal:

Is consistent with the **Mobility and Connectivity** vision component

Please explain:

Refer to the project narrative

Economic Sustainability—Expanding opportunities for residents to live, work, learn, and play in close proximity promotes long-term economic viability. Pinal County desires activity centers that serve the current and future residents’ needs offering services, businesses and employment opportunities, including high-tech and environmentally-friendly employers who champion Pinal County’s conservation philosophy. The creation of the full range of quality jobs that allow residents to start their career, raise a family, and move up instead of out of Pinal County for career advancement is essential. (This may not apply to all projects)

The proposal:

Is consistent with the **Economic Sustainability** vision component

Please explain:

Refer to the project narrative

Open Spaces and Places—Residents value the large connected open spaces and unique places of Pinal County, not only as part of their quality of life, but as an important resource to sustain the region's immense wildlife habitat and their corridors. From the majestic mountains rising from the desert floor in the west to the high desert and rugged mountain terrain to the east, enjoyment of and respect for the natural surroundings is a big part of why people choose Pinal County to live and visit.

The proposal:

Is consistent with the **Open Spaces and Places** vision component

Please explain:

Refer to the project narrative

Environmental Stewardship—People value the views of the mountains and open vistas during the day and the stars at night. These values have translated to a strong conservation ethic that stresses the importance of maintaining the quality of Pinal County's natural resources for future generations. Pinal County is the leader in environmental stewardship, and rewards and encourages sustainable practices such as innovative land use planning, sustainable agriculture, water conservation, green building development, and the use of renewable and alternative energy sources.

The proposal:

Is consistent with the **Environmental Stewardship** vision component

Refer to the project narrative

Healthy, Happy Residents—Access to quality healthcare and healthy lifestyle choices is a priority. Pinal County is a healthy, safe place where residents can walk or ride to activity centers and where interaction in Pinal County’s clean, natural environment is encouraged. Ensuring residents are healthy, safe and happy in their community is a priority for Pinal County.

The proposal:

Is consistent with the **Healthy, Happy Residents** vision component

Refer to the project narrative

Quality Educational Opportunities—Quality, community-based Pre k-12 programs that provide youth with a competitive edge along with a wide variety of post-secondary educational opportunities and technical or specialized workforce training are necessities. Pinal County residents seek out life-long opportunities that help to expand their minds and diversify their experiences. (This may not apply to all projects)

The proposal:

Is consistent with the **Quality Educational Opportunities** vision component

Please explain:

Refer to the project narrative

PART TWO

Consistency with the Plan's Key Concepts illustrated on Land Use, Economic, and Circulation graphics

Consistency with the Land Use Designation shown on the graphics

The project land uses:

- Are shown as indicated on the Land Use and Economic Development graphic
- Are not shown as indicated on the Land Use and Economic Development graphic

Refer to the project narrative

Consistency with the Mixed Use Activity Center Concept

The project land uses:

- Meet the Mixed Use Activity Center requirements
- Are not shown within a Mixed Use Activity Center

If shown within a Mixed Use Activity Center, explain how it meets the planning guidelines outlined in the Land Use element.

Refer to the project narrative

The land use proposal includes a Mixed Use project, not shown in a Mixed Use Activity Center; explain how it meets the planning guidelines and intent of the Plan.

Refer to the project narrative

Consistency with the Planning Guidelines described in the Land Use element

The project land uses:

- Are consistent with the applicable Planning Guidelines described in the Land Use element

Refer to the project narrative

Quality Employment Opportunities County-wide

The Comprehensive Plan stresses the importance of increasing the number of opportunities to locate quality jobs County-wide in order to increase the jobs-to-population ratio.

The proposal:

- Is consistent with the Economic Development element
- Includes additional information about how the development addresses the Economic Development Vision embodied in the Comprehensive Plan.

Please explain:

Refer to the project narrative

Viability Agriculture, Equestrian and Rural Lifestyle

Historically, agriculture has played an important role in Pinal County's economy and lifestyle. Encouraging the continuation of viable agriculture and protecting it is an important component of the Plan. Additionally, supporting an equestrian and rural lifestyle has a place in Pinal County as it continues to urbanize.

The proposal:

- Clusters development to protect open space and agriculture
- Includes additional information about how the development addresses Viable Agriculture, Equestrian, and Rural Lifestyle.

Please explain:

Refer to the project narrative

System of Connected Trails and Preservation of Open Space

Pinal County is committed to the preservation of large swaths of open space and the development of a connected system of trails. This applies to all projects/proposals/actions.

The proposal:

- Is consistent with *Pinal County Trails and Open Space Master Plan* and Comprehensive Plan Open Space and Places Chapter
- Includes additional information about how the development addresses the open space Vision and goals

Please explain:

Refer to the project narrative

Natural and Cultural Resource Conservation

The Comprehensive Plan strives to protect natural/cultural resources, wildlife corridors and environmentally-sensitive areas such as mountains and foothills, major washes, and vistas. These areas are predominantly undeveloped and contain sensitive resources or natural hazard areas.

The proposal:

- Address environmentally sensitive areas it may impact.
- Includes additional information about how the development addresses the natural and cultural resource conservation.

Please explain:

Refer to the project narrative

Water Resources, Public Facilities/Services, and Infrastructure Support

All developments must bring adequate water resources and the necessary infrastructure to support the intensity of development in order to minimize the impact on the County's ability to provide public services. All development and growth, public and private, must acknowledge its impacts and pay its own way.

The proposal:

- Ensures that adequate public facilities are in place or planned for within a reasonable time of the start of the new development

Please explain:

Refer to the project narrative

APPENDIX B

ARIZONA GAME AND FISH DEPARTMENT

Environmental Online Review Tool Report

May 18, 2021

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:

Box Canyon Solar Project

Project Description:

Solar PV project

Project Type:

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

Contact Person:

Paul Szewczykowski

Organization:

EPG Terracon

On Behalf Of:

PRIVATE

Project ID:

HGIS-13528

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.

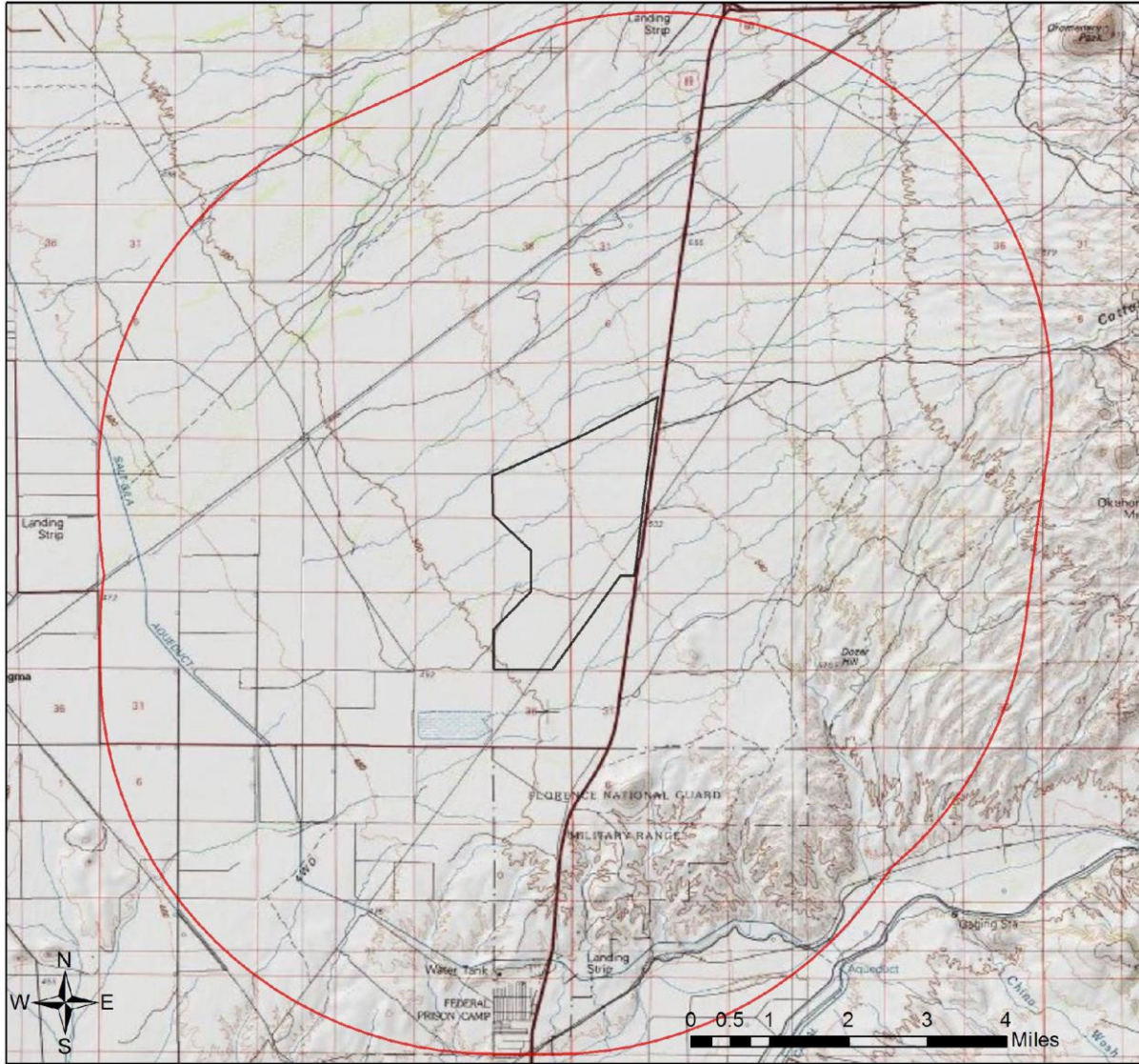
Locations Accuracy Disclaimer:


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

Box Canyon Solar Project USA Topo Basemap With Locator Map



-  Project Boundary
-  Buffered Project Boundary

Project Size (acres): 2,791.08

Lat/Long (DD): 33.1583 / -111.3704

County(s): Pinal

AGFD Region(s): Mesa

Township/Range(s): T3S, R10E; T3S, R9E

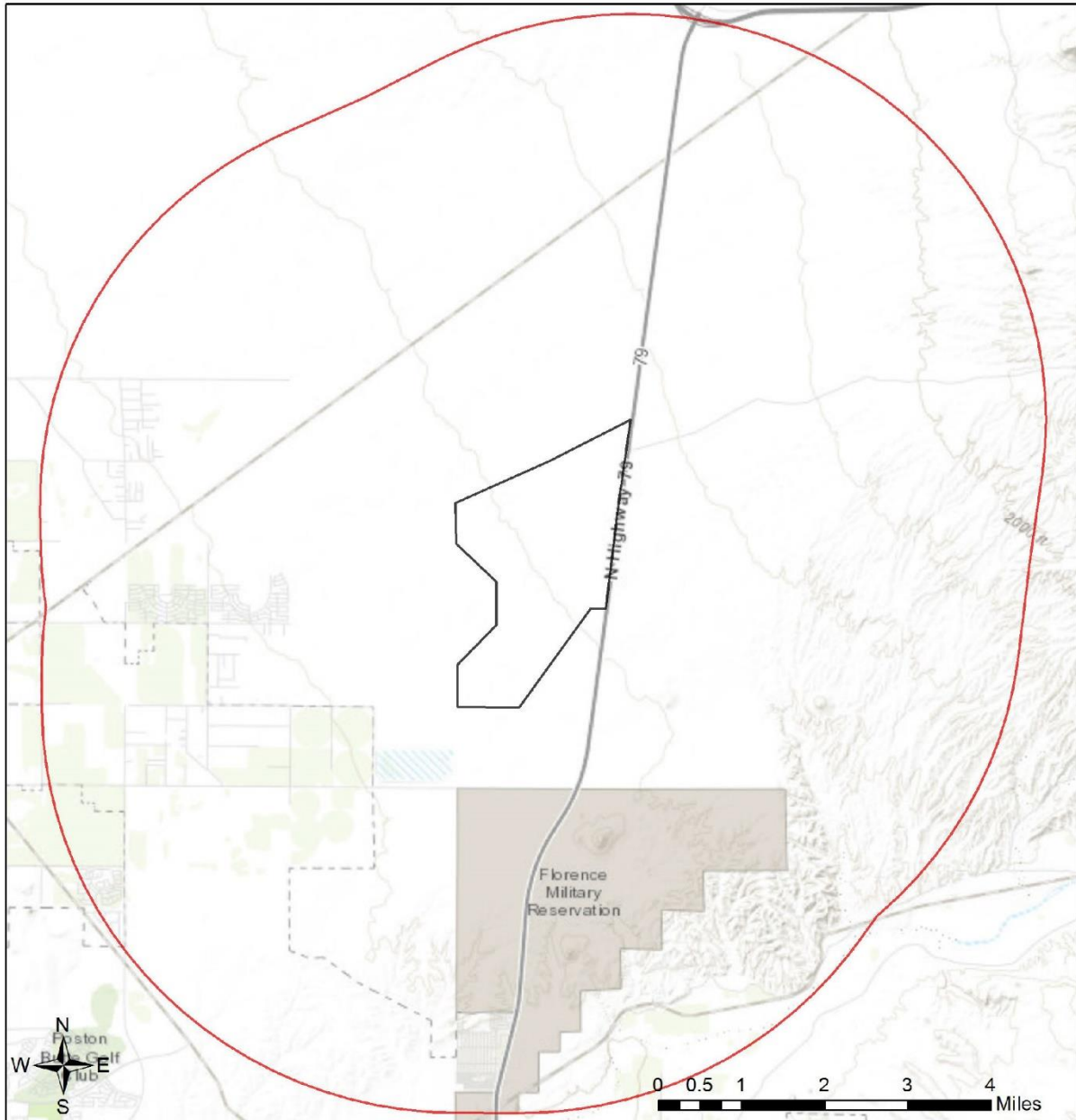
USGS Quad(s): FLORENCE NE; MAGMA

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



Box Canyon Solar Project

Web Map As Submitted By User

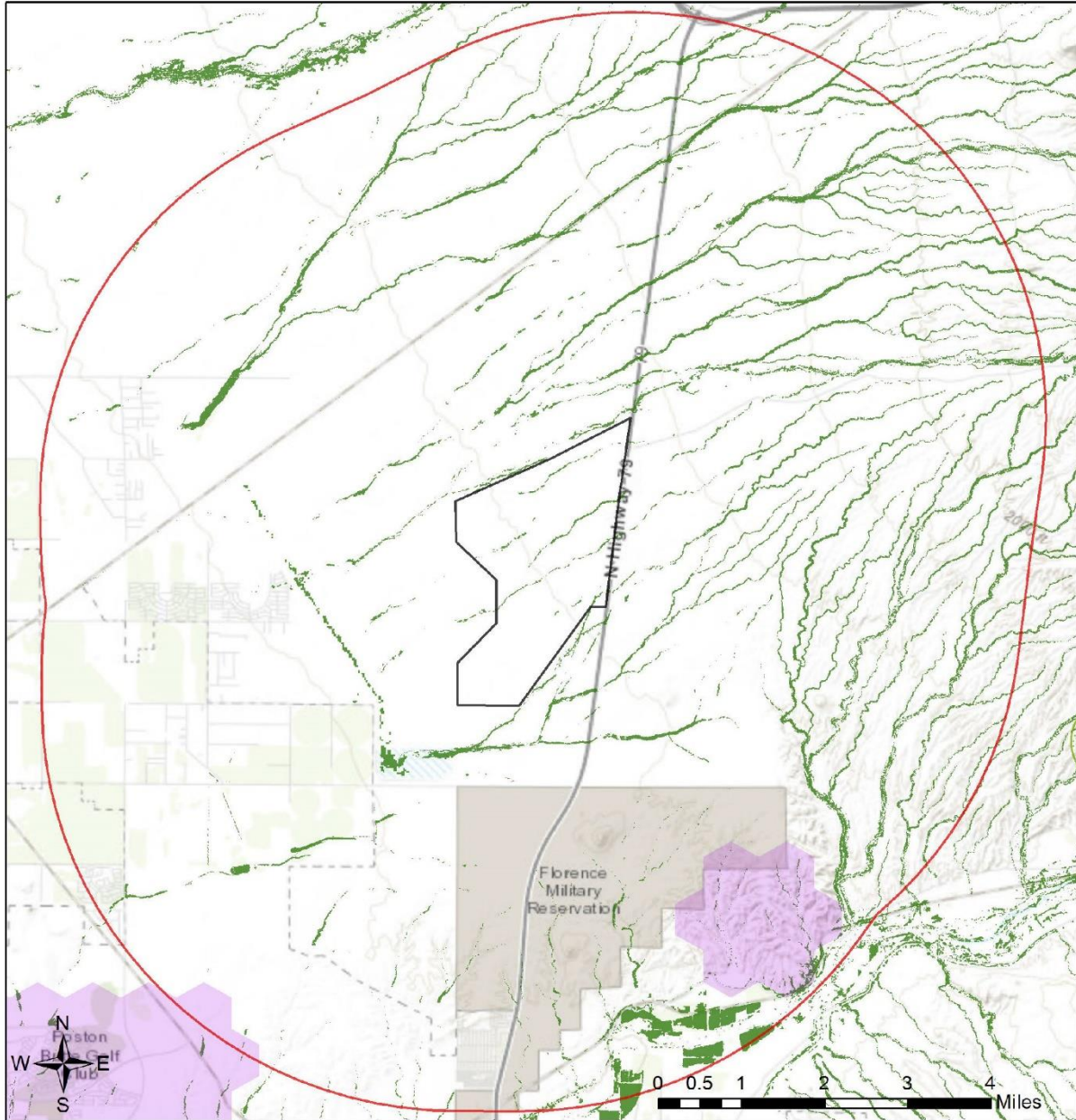


- Project Boundary
- Buffered Project Boundary

Project Size (acres): 2,791.08
Lat/Long (DD): 33.1583 / -111.3704
County(s): Pinal
AGFD Region(s): Mesa
Township/Range(s): T3S, R10E; T3S, R9E
USGS Quad(s): FLORENCE NE; MAGMA

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

Box Canyon Solar Project Important Areas



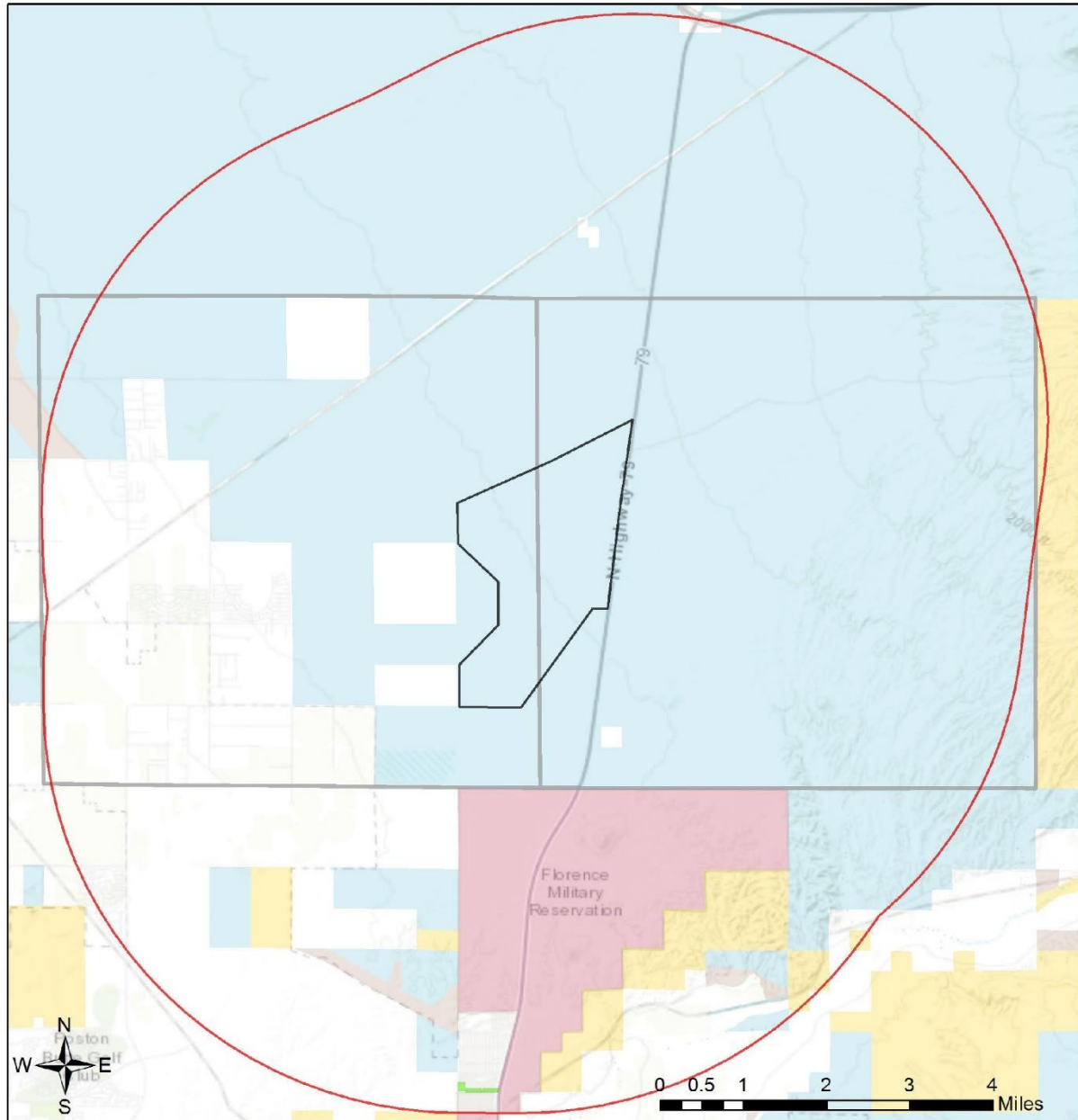
- Project Boundary
- Buffered Project Boundary
- Wildlife Connectivity
- Important Connectivity Zones
- Pinal County Riparian
- Critical Habitat
- Important Bird Areas

Project Size (acres): 2,791.08
 Lat/Long (DD): 33.1583 / -111.3704
 County(s): Pinal
 AGFD Region(s): Mesa
 Township/Range(s): T3S, R10E; T3S, R9E
 USGS Quad(s): FLORENCE NE; MAGMA

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

Box Canyon Solar Project

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): 2,791.08
 Lat/Long (DD): 33.1583 / -111.3704
 County(s): Pinal
 AGFD Region(s): Mesa
 Township/Range(s): T3S, R10E; T3S, R9E
 USGS Quad(s): FLORENCE NE; MAGMA

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

Special Status Species Documented within 5 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Chionactis annulata	Resplendent Shovel-nosed Snake					1C
Gopherus morafkai	Sonoran Desert Tortoise	C	S	S		1A
Phyllorhynchus browni	Saddled Leaf-nosed Snake					1B

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

Special Areas Documented that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Florence Military Reservation	Pinal County Wildlife Movement Area - Landscape					
Riparian Area	Riparian Area					
Valley north and east of the San Tan Mountains	Pinal County Wildlife Movement Area - Landscape					

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

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
Aix sponsa	Wood Duck					1B
Ammospermophilus harrisi	Harris' Antelope Squirrel					1B
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Botaurus lentiginosus	American Bittern					1B
Buteo regalis	Ferruginous Hawk	SC		S		1B
Calypte costae	Costa's Hummingbird					1C
Chilomeniscus stramineus	Variable Sandsnake					1B
Chionactis annulata	Resplendent Shovel-nosed Snake	SC				1C
Colaptes chrysoides	Gilded Flicker			S		1B
Coluber bilineatus	Sonoran Whipsnake					1B
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Crotalus tigris	Tiger Rattlesnake					1B
Cynanthus latirostris	Broad-billed Hummingbird		S			1B
Empidonax wrightii	Gray Flycatcher					1C
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
Gopherus morafkai	Sonoran Desert Tortoise	C	S	S		1A
Haliaeetus leucocephalus	Bald Eagle	SC, BGA	S	S		1A

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
Heloderma suspectum	Gila Monster					1A
Incilius alvarius	Sonoran Desert Toad					1B
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		1B
Lasiurus blossevillii	Western Red Bat		S			1B
Lasiurus xanthinus	Western Yellow Bat		S			1B
Leopardus pardalis	Ocelot	LE				1A
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC				1A
Lepus alleni	Antelope Jackrabbit					1B
Macrotus californicus	California Leaf-nosed Bat	SC		S		1B
Melanerpes uropygialis	Gila Woodpecker					1B
Melospiza lincolni	Lincoln's Sparrow					1B
Melospiza aberti	Abert's Towhee		S			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
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
Phrynosoma solare	Regal Horned Lizard					1B
Phyllorhynchus browni	Saddled Leaf-nosed Snake					1B
Progne subis hesperia	Desert Purple Martin			S		1B
Setophaga petechia	Yellow Warbler					1B
Spizella breweri	Brewer's Sparrow					1C
Tadarida brasiliensis	Brazilian Free-tailed Bat					1B
Toxostoma lecontei	LeConte's Thrasher			S		1B
Troglodytes pacificus	Pacific Wren					1B
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					
Odocoileus hemionus	Mule Deer					

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

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	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 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.naturereserve.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.

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:

Analysis indicates that your project is located in the vicinity of an identified **wildlife habitat connectivity feature**. The **County-level Stakeholder Assessments** contain five categories of data (Barrier/Development, Wildlife Crossing Area, Wildlife Movement Area- Diffuse, Wildlife movement Area- Landscape, Wildlife Movement Area- Riparian/Washes) that provide a context of select anthropogenic barriers, and potential connectivity. The reports provide recommendations for opportunities to preserve or enhance permeability. Project planning and implementation efforts should focus on maintaining and improving opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer to: <https://www.azgfd.com/wildlife/planning/habitatconnectivity/identifying-corridors/>. Please contact the Project Evaluation Program (pep@azgfd.gov) for specific project recommendations.

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

This review has identified **riparian areas** within the vicinity of your project. During the planning stage of your project, avoid, minimize, or mitigate any potential impacts to riparian areas identified in this report. Riparian areas play an important role in maintaining the functional integrity of the landscape, primarily by acting as natural drainages that convey water through an area, thereby reducing flood events. In addition, riparian areas provide important movement corridors and habitat for fish and wildlife. Riparian areas are channels that contain water year-round or at least part of the year. Riparian areas also include those channels which are dry most of the year, but may contain or convey water following rain events. All types of riparian areas offer vital habitats, resources, and movement corridors for wildlife. The Pinal County Comprehensive Plan (i.e. policies 6.1.2.1 and 7.1.2.4), Open Space and Trails Master Plan, Drainage Ordinance, and Drainage Design Manual all identify riparian area considerations, guidance, and policies. Guidelines to avoid, minimize, or mitigate impacts to riparian habitat can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>. Based on the project type entered, further consultation with the Arizona Game and Fish Department and Pinal County may be warranted.

HDMS records indicate that **Sonoran Desert Tortoise** have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at: <https://www.azgfd.com/wildlife/nongamemanagement/tortoise/>

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at: <https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.

