



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

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June 4, 2013

Mr. Richard Searle  
Cochise County Board of Supervisors  
1415 Melody Lane, Bldg G  
Bisbee, AZ 85603

**Re: Red Horse Wind 2, LLC.**

Dear Mr. Searle:

The Arizona Game and Fish Department (Department) reviewed the Special Use Permit that was being requested by Red Horse Wind 2, LLC, Torch Renewable Energy, Inc. The applicant was proposing to develop a 51 MW wind facility consisting of 28 turbines with accessory uses, including underground and overhead transmission lines, a substation, and operation facility. The permit was approved on April 10<sup>th</sup> by the Cochise County Planning and Zoning Commission but was appealed by the Arizona Audubon Society.

The Department would like to request once again that you consider adding conditions to the permit. We have worked with other counties (Coconino, Navajo, Maricopa, etc.) to include conditions to permits to ensure wildlife issues are addressed. We have also worked with Coconino and Navajo County to develop policies for wind energy which are readily available on-line. Below are the conditions we would like you to consider. We have also included the original letter for reference.

*Summary of Department Recommendations*

1. Site evaluation and pre-construction biological monitoring: Preliminary Screening and Pre-Construction Study Plan should be submitted to the Arizona Game and Fish Department for review and concurrence.
2. Bats: After all the data are analyzed, the Department may recommend a radio telemetry or radar study to better assess bat movement in and around the project area. In addition, the Department may ask for more extensive roost/colony searches in order to determine why bats are moving through the Red Horse project area.
3. Eagles: Work closely with the Arizona Game and Fish Department and U.S. Fish and Wildlife Service to develop an Eagle Conservation Plan (ECP) for the project to help mitigate any unanticipated negative effects of the proposed wind farm on eagles.

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4. Avian and Bat Protection Plan (ABPP): Work closely with the Arizona Game and Fish Department and U.S. Fish and Wildlife Service to develop an ABPP for the project to help mitigate any unanticipated negative effects of the proposed wind farm on birds and bats.
5. Post-construction study plan: Work with the Department and the U.S. Fish and Wildlife Service to develop an appropriate post-construction monitoring plan to assess potential wildlife impacts of the wind farm consistent with and supportive of the objectives of the ABPP.
6. Hunter access: Discussions between the applicant and Arizona Game and Fish Department need to occur to develop a mutually agreeable approach to hunter access for Red Horse Wind project for both the construction and operational phases of the project.
7. Overhead transmission line: Consult the Avian Power Line Interaction Committee's guidance to ensure that transmission line supports and other transmission infrastructure minimize the potential for avian electrocution.
8. Invasive weed control: Develop a noxious weed management plan which covers both the construction and operational phases, and which encompasses all areas of the project site where significant ground disturbance has occurred or where weed invasion is possible.
9. Turbine lighting: As recommended by the U.S. Fish and Wildlife Service, use the minimum number and intensity of lights and the longest duration between flashes permitted by the Federal Aviation Administration for this project. If permitted by the FAA use white lights instead of red to minimize the attraction of night-migrating birds.

We appreciate the opportunity to comment on the application for the Red Horse Wind Proposal. If you have any questions or desire any further information, please do not hesitate to contact me at (623) 236-7606.

Sincerely,



Ginger Ritter

Project Evaluation Program Specialist, Habitat Branch

Attachments

cc: Laura Canaca, Project Evaluation Program Supervisor, Habiata Branch  
John Windes, Habitat Program Manager, Region V  
Bill Werner, Renewable Energy Coordinator, USFWS

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