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GAME AND FISH DEPARTMENT

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JUN - 8 2005

June 3, 2005

Ms. Laurie A. Woodall, Chairman
Power Plant and Transmission Line Siting Committee
Office of the Attorney General
1275 West Washington
Phoenix, Arizona 85007

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Re: Certificate of Environmental Compatibility for the Palo Verde Hub to TS-5 500 kV
Transmission Project (Docket No. L00000D-05-0128)

Dear Chairman Woodall:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced Certificate of Environmental Compatibility (CEC) and the associated Environmental Assessment (EA) for potential impacts to fish and wildlife resources. The Department understands that the proposed project consists of construction and operation of a single-circuit 500kV electric transmission line and up to two new 500kV switchyards. The proposed transmission line route covers approximately 42 to 44 miles, and would be constructed to support the increased development and growth occurring and anticipated in the western Phoenix metropolitan area.

Based on information within the CEC application and the EA, it appears that the majority of the proposed routes will parallel portions of existing transmission lines as well as the Central Arizona Project (CAP) canal, and would be located within Bureau of Land Management (BLM)-designated utility corridors on BLM lands. The remaining portions of the line would cross Bureau of Reclamation, Arizona State Trust, or private lands. The Department supports the proposed route (vs. the alternative route), locating power lines within previously disturbed corridors to minimize direct, indirect and cumulative impacts to wildlife and associated habitats. In this regard, the southern portion of the proposed route, which lies between Saddle Mountain and Palo Verde Hills, parallels existing transmission lines within the existing BLM utility corridor. As the EA indicates, bighorn sheep utilize Saddle Mountain and the Palo Verde Hills, passing back and forth under the existing transmission line, when suitable forage or conditions exist. The Department is concerned that creation of new roads associated with additional power line facilities may encourage additional public use of minimally developed areas, causing increased disturbance to bighorn sheep and other wildlife as well as further fragmenting the landscape. Therefore, when construction activities occur, we recommend that any areas cleared of vegetation, including roads, staging areas, or tower locations be recontoured and rehabilitated, to the extent practicable.

Ms. Laurie A. Woodall

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Additionally, the Department recommends that towers placed parallel to the CAP canal minimize to the extent practicable, vegetation disturbance to green-up areas along the north side of the canal, where substantial forage exists for native wildlife.

Exhibit A-4 indicates that much of the adjacent lands are planned for future development for rural residential and planned communities. Impacts to wildlife, including bighorn sheep, will likely be heightened by ongoing and increasing development activities, further warranting the need to identify and protect key wildlife movement corridors and by ensuring that project activities fall within previously disturbed corridors and routes.

The Department supports the standard construction and operating procedures and mitigation measures as presented in Appendix A of the EA, including that new structures will conform to the Suggested Practices for Raptor Protection on Power Lines (Avian Power Line Interaction Committee 1996). The Department also supports that the Plan of Development (POD) will identify avoidance measures to address any potential impacts to Sonoran desert tortoise, burrowing owl, and desert bighorn sheep. In this regard, we would appreciate additional opportunities to coordinate with APS at the point when the POD is drafted, or when activities commence, to ensure that impacts to wildlife or wildlife habitat can be avoided, minimized, and/or mitigated; seasonally, spatially, or otherwise.

The Department appreciates the opportunity to review this CEC application prior to consideration by the Power Plant and Transmission Line Siting Committee. We look forward to working closely with the Committee in the future to develop potential alternatives and appropriate mitigation to avoid or minimize impacts to fish and wildlife resources as a result of proposed powerplant and transmission line projects. As an attachment to this letter, we have included an updated list of sensitive species within the proposed project area. If you have any questions or require any additional information regarding this letter, please contact me at (602) 789-3605.

Sincerely,



Bob Broscheid
Habitat Branch Chief

BB:rd

cc: Rebecca Davidson, Project Evaluation Program Supervisor
Russ Haughey, Habitat Program Manager, Region VI
Russ Engel, Habitat Program Manager, Region IV
Paul Herndon, APS Project Manager

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Special Status Species Within 3 Miles of Palo Verde hub to TS-5 500 kV Transmission Project

NAME	COMMON NAME	ESA	USFS	BLM	STATE
<i>Gopherus agassizii</i> (Sonoran Population)	Sonoran Desert Tortoise	SC			WSC

No Critical Habitats in project area. AGFD # 05-12-05(06). Proposed Palo Verde hub to TS-5 500 kV Transmission Project.

Arizona Game and Fish Department, Heritage Data Management System, May 27, 2005.

The Department's HDMS data are 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. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity.