



# GAME AND FISH DEPARTMENT

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December 14, 2001

L-00000AA-01-0116  
Arizona Corporation Commission  
**DOCKETED**

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ATTY GEN'L'S OFFICE

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

**DEC 18 2001**

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Re: Allegheny Energy Supply Company- La Paz Generating Facility

Dear Ms. Woodall:

The purpose of this letter is to provide additional management recommendations for evaporative ponds associated with the La Paz Generating Facility and natural gas-fired generating facilities in Arizona.

At your request, the Arizona Game and Fish Department (Department) reviewed Dr. Terrill's testimony regarding an evaluation of potential impacts to wildlife resources as a result of power plants in Arizona. The Department stated in our letter, dated December 10, 2001, that we do not disagree with that review, and that we believe evaporative ponds have the potential to adversely impact wildlife resources. For that reason, we believe monitoring water quality and wildlife use should be an important aspect of avoiding potential adverse impacts to wildlife. Monitoring should be designed to identify potential impacts, and then develop appropriate contingency actions or long-term mitigation measures. Since migratory birds are protected under the Migratory Bird Treaty Act, the Department and U.S. Fish and Wildlife Service should be included in the design and implementation of monitoring, research and contingency plans. If monitoring identifies any potential negative impacts, we recommend that the following contingency plans be established to address these problems.

Avoidance

Preventing wildlife from utilizing the evaporation ponds could be accomplished through measures such as fencing, netting, enclosing, harassing, or removing the water.

Improving Conditions

Improving water quality in the evaporation ponds can be accomplished through adding fresh water, removing toxins, or removing contaminated food sources (e.g., aquatic plants and brine shrimp)

The Department has been working with Allegheny Energy Supply Company to identify potential measures (fencing and vegetation control) that we believe will reduce wildlife use of the ponds.

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Ms. Laurie A. Woodall  
December 14, 2001  
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In addition, the applicant has proposed to monitor water quality and wildlife use. The Department will continue to work with Allegheny Energy Supply Company to develop contingency plans that minimize potential adverse impacts to wildlife. Please contact me at (602) 789-3602 if you have any questions regarding this letter or the Department's involvement in this project.

Sincerely,



John Kennedy  
Habitat Branch Chief

JK:BDB:bb

cc: Bob Broscheid, Project Evaluation Program Supervisor  
Russ Engel, Habitat Program Manager, Region IV, Yuma