



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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August 1, 2017

Ms. Melissa Pauley
Office of Electricity Delivery and Energy Reliability
(Mail Stop: OE-20)
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Re: Nogales Interconnection Project draft EA Comments

Dear. Ms. Pauley,

The Arizona Game and Fish Department (Department) has reviewed the Draft Environmental Assessment (EA) for the Nogales Interconnection Project with regard to potential impacts to wildlife and wildlife habitat. As presented in the Draft EA, the Department of Energy's (DOE) proposed federal action is the decision for issuance of a Presidential permit to authorize the construction, connection, operation, and maintenance of the proposed 320-kV AC transmission line at the proposed international border crossing location approximately 0.6 miles west of SR 189/Mariposa Road.

We understand the project is located on privately owned lands, the bulk of which are previously-disturbed possessing minimal wildlife value. However, some portions of the project, especially along the western edge, contain relatively un-altered native wildlife habitat. The preferred alternative (Alternative 3) would result in an estimated loss of nearly 40 acres of undeveloped land (wildlife habitat).

The Department largely supports the Applicant Proposed Measures for impacts to vegetation. Regarding seeding of disturbed areas, and depending upon what month construction is completed, it may be more prudent to seed just prior to, or during, the summer monsoon season to ensure greatest germination and revegetation success. An acceptable seeding period could extend from mid-June to mid-November. To best mimic the natural condition, ensure restoration seed mixes include a diversity of annual and perennial plants that represent both the spring and late summer/monsoon/fall growing seasons. The Department is available to assist in identifying local practitioners experienced with seed collection, propagation, and restoration in southern Arizona habitats.

The Applicant Proposed Measures for impacts to wildlife should be expanded beyond just "selective vegetation removal". The Department recognizes that in the development and

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implementation of a project, some loss of wildlife and habitat is inevitable. The first step in addressing the potential loss of wildlife and wildlife habitat is to avoid the impact(s). If avoidance is not feasible, then minimizing and mitigating potential negative impacts should be evaluated. The general recommendations described below begin to address avoidance and minimization strategies. For wildlife and habitat losses that cannot be avoided, it is the policy of the Arizona Game and Fish Commission that the Department shall seek compensation at a 100% level, where feasible, for actual or potential habitat losses resulting from land and water projects.

- The Department requests DOE include as a condition of this permit that habitat losses be mitigated. The Department is available to DOE and the applicant to discuss mitigation options.
- 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 May 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.
- Establish a construction area speed limit of 15 miles per hour to avoid vehicle/wildlife collisions (slow vehicle speeds should allow even very small animals to move out of harm's way).

The Department thanks the Department of Energy for consideration of these comments. Please contact me directly at kterpening@azgfd.gov or 520-388-4447 if you have any questions regarding this letter.

Sincerely,



Kristin Terpening

Habitat, Evaluation and Lands Program Specialist, Region V

cc: Laura Canaca, AGFD Project Evaluation Program Supervisor
Gabriela Canales, Hunt Power