



United States Department of the Interior

U.S. Fish and Wildlife Service
Arizona Ecological Services Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 Fax: (602) 242-2513



In reply refer to:
AESO/SE

02EAAZ00-2012-CPA-0104

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BUREAU OF LAND MANAGEMENT
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Memorandum

To: Field Manager, Bureau of Land Management, Phoenix, Arizona
(Attn. Joe Incardine)

From: Field Supervisor

Subject: Comments-Draft Environmental Impact Statement, APS Sun Valley to Morgan
500/230 kV Transmission Line Project, Dated October 2012

This memorandum documents our review of the "Draft Environmental Impact Statement, APS Sun Valley to Morgan 500/230 kV Transmission Line Project," dated October 2012, developed by the Bureau of Land Management (BLM) in accordance with the National Environmental Policy Act of 1969 (NEPA, 42 U.S.C. §4321 *et seq.*). The proposed project is the construction of a 500/230 kV transmission line approximately 38 miles from the Sun Valley Substation, in the northwest portion of the Town of Buckeye, to the Morgan Substation in the City of Peoria, in Maricopa County, Arizona. The route would cross and parallel State Route (SR) 74 to the north on Bureau of Land Management (BLM)-managed public land for approximately five miles before crossing to the south side of SR 74 and continuing to the Morgan Substation. The BLM Bradshaw-Harquahala Resource Management Plan (RMP) would be amended to establish the needed 200-foot wide Right of-Way (ROW) as a single-use utility corridor on BLM-managed public lands along SR 74. The RMP would also be amended to change the Visual Resource Management (VRM) Class from VRM Class III to VRM Class IV within the transportation corridor on public lands north of SR 74 and within a block of BLM-managed public lands south of SR 74. BLM would approve, deny, or approve with modifications the APS ROW application for BLM-managed public lands crossed by the Project. We provide these comments under the authority of NEPA (40 CFR part 1503).

Comments by Page

P. 2-13, last ¶ In order to protect the Sonoran desert tortoise (*Gopherus morafki*) and other species, we recommend that contained washout areas be designated for cleanout of concrete trucks and that those areas be cleaned up following completion of concrete work. Pounded water can be attractive to desert tortoise and may increase tortoise use of construction areas, increasing potential for crushing.

P. 2-21, 4th ¶ While a “lush and stable shrub/grass/forb community” may be desirable from a transmission line right-of-way (ROW) perspective it may not be a realistic goal for some project segments supporting Sonoran Desert vegetation. We recommend that the Integrated Vegetation Management (IVM) plan be tailored to the area and type conversion be avoided. Short stature shrubs provide some stability in areas of poor soil development.

P. 3-187, 4th ¶ Critical habitat for southwestern willow flycatcher was designated January 3, 2013. We recommend that the related text be updated. A copy is available on our website at <http://www.fws.gov/southwest/es/arizona>.

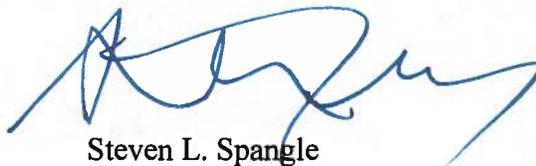
P. 4-187, 1st ¶ We recommend that the sentence “Desert washes are mainly present west of the Action Alternative routes (i.e., Hieroglyphic Mountain area), so any disturbance to these areas would be the same under all alternatives.” be reviewed for accuracy and clarity. The preferred alternative traverses a portion of the Hieroglyphic Mountains (see U.S.G.S. 7.5’ topographic sheet Baldy Mountain Quadrangle, Arizona – Maricopa County) and the route crosses several washes.

P. 4-191, 1st ¶ The paragraph heading is “Electrocution Risk” but the 1st sentence discusses a potential for both electrocutions and collisions of raptors and other migratory birds following construction of the line. We recommend that collision risk along the length of the preferred alternative be reviewed and discussed in a separate paragraph. We recommend that the analysis consider guidance in “Reducing Avian Collisions with Power Lines” dated October 2012 prepared by the Avian Power Line Interaction Committee (APLIC). We also recommend that static wires on the transmission line crossing of the Agua Fria River on the eastern end of the project and adjacent to open water in the Central Arizona Project canal and the Hassayampa River at the western end of the project be marked with bird diverters to reduce the risk of avian collisions in those areas.

P. 4-195, 7th ¶ and P. 4- 235 8th ¶ We recommend addition of text incorporating APLIC collision guidance (cited above) following discussion of APLIC electrocution guidance.

Thank you for the opportunity to provide comments on this draft environmental impact statement. In all future correspondence on this project, please refer to project number 02EAAZ00-2012-CPA-0104. We also encourage you to continue to coordinate this project with the Arizona Game and Fish Department.

Should you require further assistance or if you have any questions, please contact Bill Werner (x217) or Debra Bills (x239).



Steven L. Spangle

cc: Chief, Habitat Branch, Arizona Game and Fish Department, Phoenix, AZ
Assistant Field Supervisor, Fish and Wildlife Service, Phoenix, AZ
(Attn: Dave Smith)