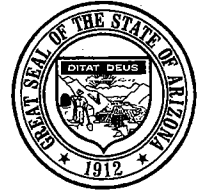




THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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November 23, 2005

Office of Electricity Delivery and Energy Reliability
 Room 8H-033
 U.S. Department of Energy
 1000 Independence Avenue, S.W.
 Washington, DC 20585

Re: Public Scoping for the Preparation of a Programmatic Environmental Impact Statement
 Entitled "Designation of Energy Corridors on Federal Land in the 11 Western States".

Dear Planning Team:

The Arizona Game and Fish Department (Department) has reviewed the above referenced Federal Register Notice [FR Doc. 05-19375] dated Wednesday, September 28, 2005, along with other information made available by the Department of Energy (DOE), the Bureau of Land Management (BLM), and the U.S. Forest Service (FS) in regards to the preparation of a Programmatic Environmental Impact Statement (PEIS) for the designation of energy corridors on federal land in 11 Western states. The Department appreciates this opportunity to provide preliminary comments for consideration prior to the development of the PEIS.

The Arizona Game and Fish Commission, by and through the Department, is the state agency responsible for the management of fish and wildlife in the state of Arizona. The Department works closely with the BLM and FS to manage fish and wildlife populations, as well as the habitats that sustain the wildlife species. Our agency is concerned not just with the conservation and recovery of federally listed, threatened and endangered species, but the conservation of all native species of wildlife in Arizona. Subsequently, we request that the PEIS also consider the impacts to all wildlife species across the Western states, many of which, are declining across their range, and may soon be in danger of listing under the Endangered Species Act.

We understand that Arizona's increasing human population has necessitated more roads, wider highways, urban development, and other related structures and activities, including the expansion or addition to utility and energy corridors across the state. If not planned correctly, the associated infrastructure can create barriers and prevent the movement of terrestrial animals. These barriers isolate wildlife and their habitat, increase the likelihood of species mortality, and restrict the ability of animals to move between important undeveloped regions of the state.

To proactively address issues pertaining to increasing development, highway construction, and urbanization, the Department, and other interested stakeholders began identifying important wildlife movement corridors across the state. This effort, called the Arizona Wildlife Linkages Workgroup is an important collaboration between public and private sector organizations working to address habitat fragmentation in a cohesive, systematic approach in order to maintain and improve wildlife biodiversity in Arizona. Comprised of representatives from the Department, the Arizona Department of Transportation, the Federal Highway Administration, FS, BLM, U.S. Fish and Wildlife Service, Northern Arizona University, the Wildlands Project, and the Sky Island Alliance, the Workgroup is developing a statewide map identifying wildlife movement corridors to provide a visual tool to guide future planning, engineering, and mitigation efforts.

Arizona Wildlife Linkages Workgroup intends to release a statewide map of existing and potential linkages by early 2006. This map and accompanying report can help Arizona's future planning, construction, and maintenance activities support the state's wildlife management goals. As part of the report, the linkages will be prioritized based on biological importance, threats, and opportunities to each potential linkage. The report will provide details with respect to ecoregion type, land ownership, and a general list of species it supports. It will also include how the linkages are being prioritized. The Wildlife Linkages report can be used by DOE, FS, and BLM as part of the PEIS to identify areas of importance for wildlife when identifying potential energy corridors across the state, thereby minimizing further fragmentation of habitat while still providing for the energy needs of the Western states.

Under the Optimization Criteria alternative, "the Agencies will assess the impacts of **new energy corridors** that will be identified through a combination of new and existing corridors based on a set of **criteria and strategies** that incorporate environmental concerns, projected supply and demand, network efficiencies, landscape features, the availability of new technologies, and costs." The Department believes this to be the soundest alternative, relative to the others (No Action, Increased Utilization, or New Corridor), dependant upon the development of the specific criteria and strategies. Any alternative selected must include a basis for corridor selection that includes consideration of all the factors mentioned above, including opportunities for adaptive management when new information becomes available.

Because the proposed action may involve actions in a floodplain or wetland, the Department understands that the draft PEIS will include floodplain and wetlands assessment and the final PEIS or Record of Decision will include a floodplain statement of findings. In Arizona, riparian areas and wetlands are small relative to other community types, and face ongoing declines, fragmentation, and degradation. Perennial streams constitute <0.4% of the total land area of the state, however, they possess a disproportionate importance and biological value compared to their area. It has been estimated that >75% or more of Arizona's wildlife species depend on riparian communities during some portion of their life cycle. In addition, riparian areas are critical to the persistence of approximately 60% of the fish and wildlife species currently in jeopardy of extirpation from the state. In a broader context, riverine systems also serve as major

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pathways for genetic exchange, movement, and important resources for shelter, stop-over habitat for migratory species, food and water.

The Department recommends that riparian and wetland habitats be carefully considered during PEIS alternative development and placement of energy corridors, considering the future development of infrastructure necessary to transmit oil, gas, or electricity. These areas are vital to the protection and conservation of both federally listed species, as well as all native species of wildlife in Arizona. Additionally, they serve as an important and unique resource for the people of Arizona, offering a reprieve from the urban environment, a place for recreation and family, and a connection with the history of the state.

The Department appreciates the opportunity to provide comments on both large and small-scale projects across Arizona. In this regard, we would be interested in reviewing the draft PEIS when it becomes available for review. We would also be willing to provide additional information during the development of the alternatives on aspects related to wildlife corridors, linkages, key wildlife habitats, populations, and other wildlife-related environmental issues. If you have any questions, or would like to contact us to discuss these issues further, please contact Rebecca Davidson, Project Evaluation Program Supervisor at 602-789-3602.

Sincerely,



Bob Broscheid
Habitat Branch Chief

BB:rd

cc: Rebecca Davidson, Project Evaluation Program Supervisor, Habitat Branch
Dave Weedman, Aquatic Habitat Specialist
Regional Supervisors