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AUTH. NAME AUTHOR AFFILIATION
 WERNER, W.E. Arizona, State of
 RECIP. NAME RECIPIENT AFFILIATION
 Division of Licensing

SUBJECT: Comments on facility DES, NUREG-0841, on behalf of State of AZ
 Game & Fish Dept. DES grossly inadequate in description of
 impact to wildlife & wildlife habitat.

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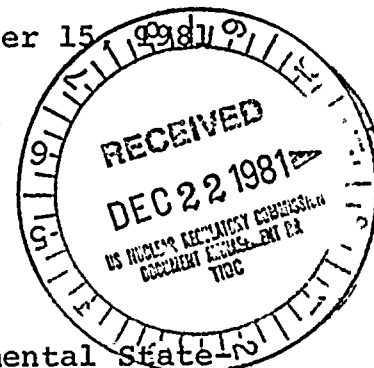
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ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

December 15, 1981



Director, Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Draft Environmental State-
ment - Operation of Palo
Verde Nuclear Generating
Station; NUREG-0841

Dear Sir:

Our Department has reviewed the "Draft Environmental State-
ment related to the operation of Palo Verde Nuclear Generating
Station Units 1, 2, and 3" and we submit the following comments.

On page 5-3 the following statement appears in a discussion
of commitments on the sewage effluent:

At the present time, however, only the
BID is utilizing its commitment. The AGFD has
abandoned its wildlife project, and the WCL
facilities were washed out by flood waters in
1978"

The Arizona Game and Fish Department commitment of 7300
acre/feet of sewage effluent ensures the survival of a diverse
riparian plant community downstream from the 91st Avenue treat-
ment plant. Therefore, our Department is utilizing this
commitment and we intend to continue to do so.

The Arizona Game and Fish Department has not abandoned any
wildlife project along the Gila River. Furthermore, our
Department has no intentions of abandoning any wildlife project
in this area.

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December 15, 1981

On page 5-10 the following statement appears:

"The staff concludes, based on the estimates given in Section 5.3.1 that diversion of wastewater for PVNGS and Buckeye Irrigation District could result in a reduction of high quality wildlife habitat in Segment B in 1986, and anticipates that most of the riparian habitat would recover by the year 2000 when water flow will achieve nearly 100 percent of 1980 levels."

Our Department believes that any significant reduction in the riparian plant communities along this stretch of the Gila River will create substantial adverse impacts to the wildlife which depend on this habitat. We further believe that the Draft Environmental Statement is grossly inadequate in its description of impacts to wildlife and wildlife habitat.

Thank you for the opportunity to submit comments on this document.

Sincerely,

Bud Bristow, Director

William E. Werner

William E. Werner
Habitat Specialist
Region IV, Yuma

WEW:kh

cc: Planning and Evaluation Branch, Phoenix

