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(TEMPORARY FORM)**

CONTROL NO: 7052

FILE: Enviro

FROM: The Maricopa Audubon Society Phoenix, Az Robert A. Witzeman		DATE OF DOC 6-27-75	DATE REC'D 7-2-75	LTR xxx	TWX	RPT	OTHER
TO: Wm. H. Regan Jr		ORIG 1-signed	CC	OTHER	SENT NRC PDR <u>XXXXXXXX</u>		SENT LOCAL PDR <u>XXXX</u>
CLASS	UNCLASS XXXXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: <u>STN- 50-528</u> 529, and 530		
DESCRIPTION: Ltr furn comments on the DES concerning Palo Verde Nuclear Generating Station trans the following: * Denotes Photographs				ENCLOSURES: Photographs -2 With Descriptions ACKNOWLEDGED DO NOT REMOVE			
PLANT NAME: Palo Verde 1 thru 3							

FOR ACTION/INFORMATION 7-8-75 JGB

BUTLER (L) W/ Copies	SCHWENGER (L) W/ Copies	ZIEMANN (L) W/ Copies	REGAN (E) W/ Copies	<i>Enviro Ltr Hot's photos</i>
CLARK (L) W/ Copies	STOLZ (L) W/ Copies	DICKER (E) W/ Copies	LEAR (L) W/ Copies	
PARR (L) W/ Copies	VASSALLO (L) W/ Copies	KNIGHTON (E) W/ Copies	SPIES W/ Copies	
KNIEL (L) W/ Copies	PURPLE (L) W/ Copies	YOUNGBLOOD (E) W/ Copies	LPM W/ Copies	

INTERNAL DISTRIBUTION

* <u>REG FILE</u>	TECH REVIEW	DENTON	LIC ASST	A/T IND.
* <u>NRC PDR</u>	SCHROEDER	GRIMES	R. DIGGS (L)	BRAITMAN
<u>OGC, ROOM P-506A</u>	MACCARY	GAMMILL	H. GEARIN (L)	SALTZMAN
<u>GOSSICK/STAFF</u>	KNIGHT	KASTNER	E. GOULBOURNE (L)	MELTZ
CASE	PAWLICKI	BALLARD	P. KREUTZER (E)	PLANS
GIAMBUSSO	SHAO	SPANGLER	J. LEE (L)	MCDONALD
BOYD	STELLO		M. MAIGRET (L)	CHAPMAN
MOORE (L)	HOUSTON	ENVIRO	S. REED (E)	DUBE (Ltr)
DEYOUNG (L)	NOVAK	MULLER	M. SERVICE (L)	E. COUPE
SKOVHOLT (L)	ROSS	DICKER	S. SHEPPARD (L)	PETERSON
GOLLER (L) (Ltr)	IPPOLITO	KNIGHTON	M. SLATER (E)	HARTFIELD (2)
P. COLLINS	TEDESCO	YOUNGBLOOD	H. SMITH (L)	KLECKER
DENISE	LONG	REGAN	S. TEETS (L)	EISENHUT
<u>REG OPR</u>	LAINAS	PROJECT LDR	G. WILLIAMS (E)	WIGGINTON
<u>FILE & REGION (2)</u>	BENAROYA	<u>BEVANS</u>	V. WILSON (L)	
MIPC	VOLLMER	MARLESS	R. WIGRAM (L)	
	<i>U.J. Collins</i>		<i>J. DUNCAN</i>	<i>Enviro</i>

EXTERNAL DISTRIBUTION

* <u>LOCAL PDR Phoenix, Arizona</u>	NATIONAL LABS <u>ANL*</u>	1 - PDR-SAN/LA/NY
<u>TIC (ABERNATHY) (12)(10)</u>	1 - W. PENNINGTON, Rm E-201 GT	1 - BROOKHAVEN NAT LAB
1 - NSIC (BUCHANAN)	1 - CONSULTANTS	1 - G. ULRIKSON ORNL
1 - ASLB	NEWMARK/BLUME/AGBABIAN	
1 - Newton Anderson		
- ACRS HOLDING/SENT		

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The Maricopa Audubon Society

4619 East Arcadia Lane • Phoenix, Arizona 85018

June 27, 1975

Wm. H. Regan, Jr., Chief
Environmental Projects Branch 4
Division of Reactor Licensing
Nuclear Regulatory Commission
Washington, D.C. 20555

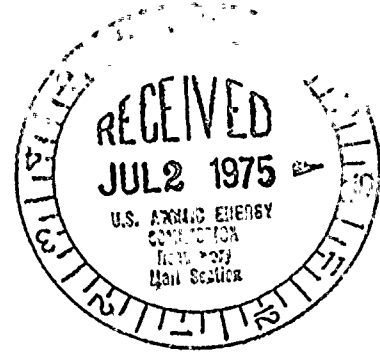
Dear Mr. Regan;

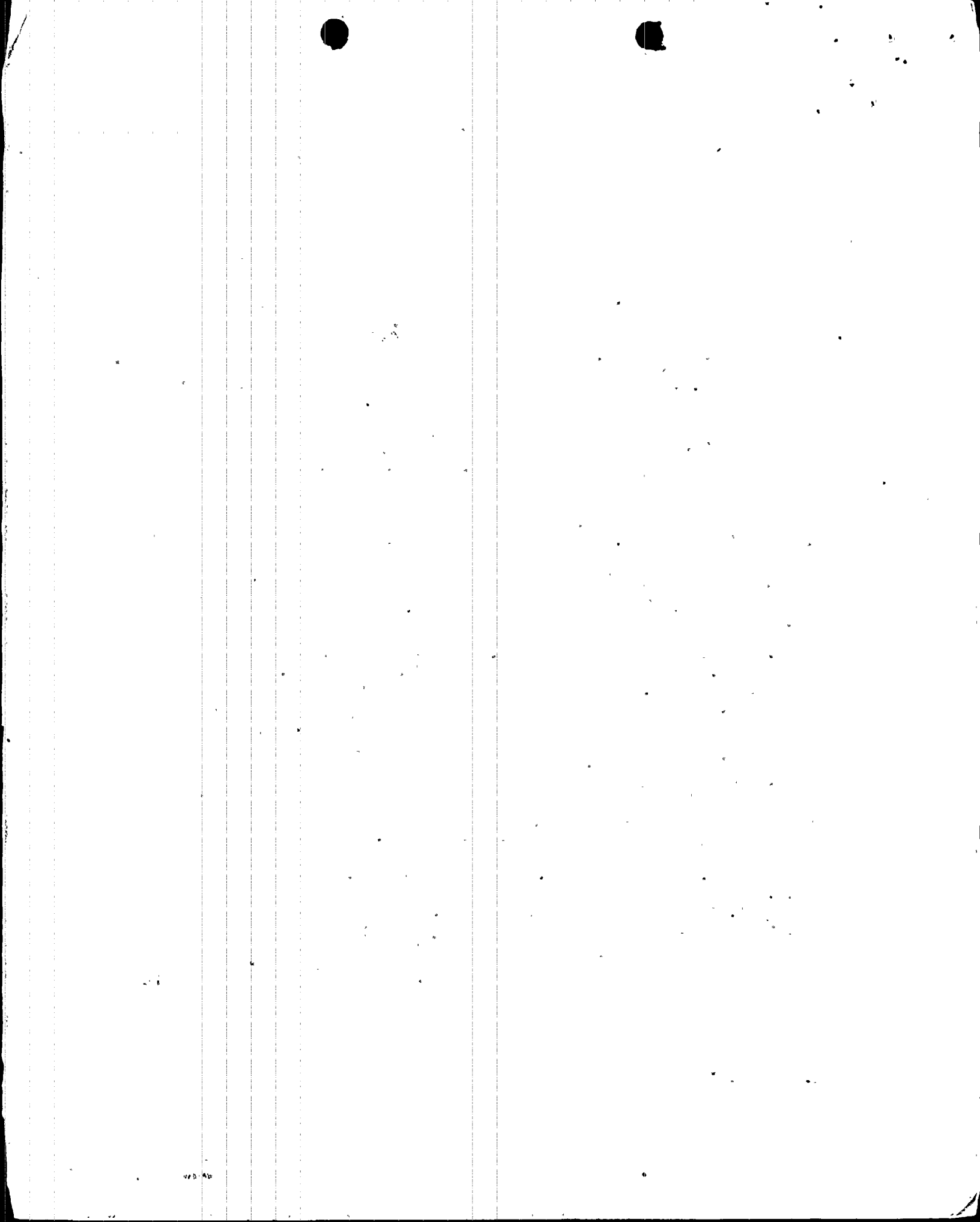
Thank you for the June 30th deadline extension for our commentary to the DES of the Palo Verde Nuclear Generating Station, Units 1,2,3 (STN 50-528, 529, 530).

Section 5.5.1.1., Water Diversion Effects: The DES has not given consideration to the environmentally more acceptable alternative of drawing off effluent from a point on the Gila River closer to the plantsite rather than constructing a very lengthy and expensive conduit originating at the 91st ave. plant. A draw-off point closer to the plant would assure a permanent stretch of riparian vegetation along the Fred J. Weiler Green Belt for the duration of the life of the PVNGS. A PVNGS conduit heading (draw-off point) situated in the Gillespie Dam area utilizing Gila River flow and/or agricultural return drainage waters could yield a sufficient quantity of water (75,000 AF) to maintain the plant cooling system. It is true that such an action would oblige the ANPP to pay higher water rates because of transit losses from percolation etc. But these higher costs for water would be offset by the decreased cost of not being obliged to construct such a long and costly conduit all the way to 91st Ave.

PVNGS should design its water-cooling technology as efficiently as the Sun Desert Nuclear Power Plant which is now being designed on the Lower Colorado near Blythe. At the Sun Desert plant only 17,000 AF of agricultural drain water are required per unit. Considering the agricultural, municipal, industrial, and fish and wildlife benefits which water provides to our Arizona economy and environment, it would behoove the PVNGS engineers to adopt the Sun Desert Nuclear Plant technology.

The impact statement does not present any documents from water law authorities to prove that there truly are legal constraints in using the Gila River bottom as the conveyance vehicle for transporting the effluent. The Buckeye Irrigation District uses this river bottom for its conveyance system and shares this same river bottom along with the Arizona Beagle Club, the U.S. Water Conservation Laboratory, and the Arizona Game and Fish Commission who also have contracts for sewage effluent. Any party who would obstruct the conveyance of this effluent could be defying the water rights of those contractual effluent users.





Diverting 75,000 AF of effluent from the Salt-Gila Channel at 91st Ave. instead of at some point farther downstream will have a major impact on the quality and quantity of the Gila River riparian habitat and on the prevalence of certain nesting avifauna. Many of these riparian and marsh-nesting avifauna are found in only a few other areas in the county or state. This riparian habitat, flowing through the Sonoran Desert, is truly endangered habitat in this state as a result of past reclamation projects (damming, diversion, channelization, and ground water pumping). The Maricopa Audubon Society feels a genuine concern for our almost extinct central Arizona wetlands. We believe the DES has ignored any presentation of this impact.

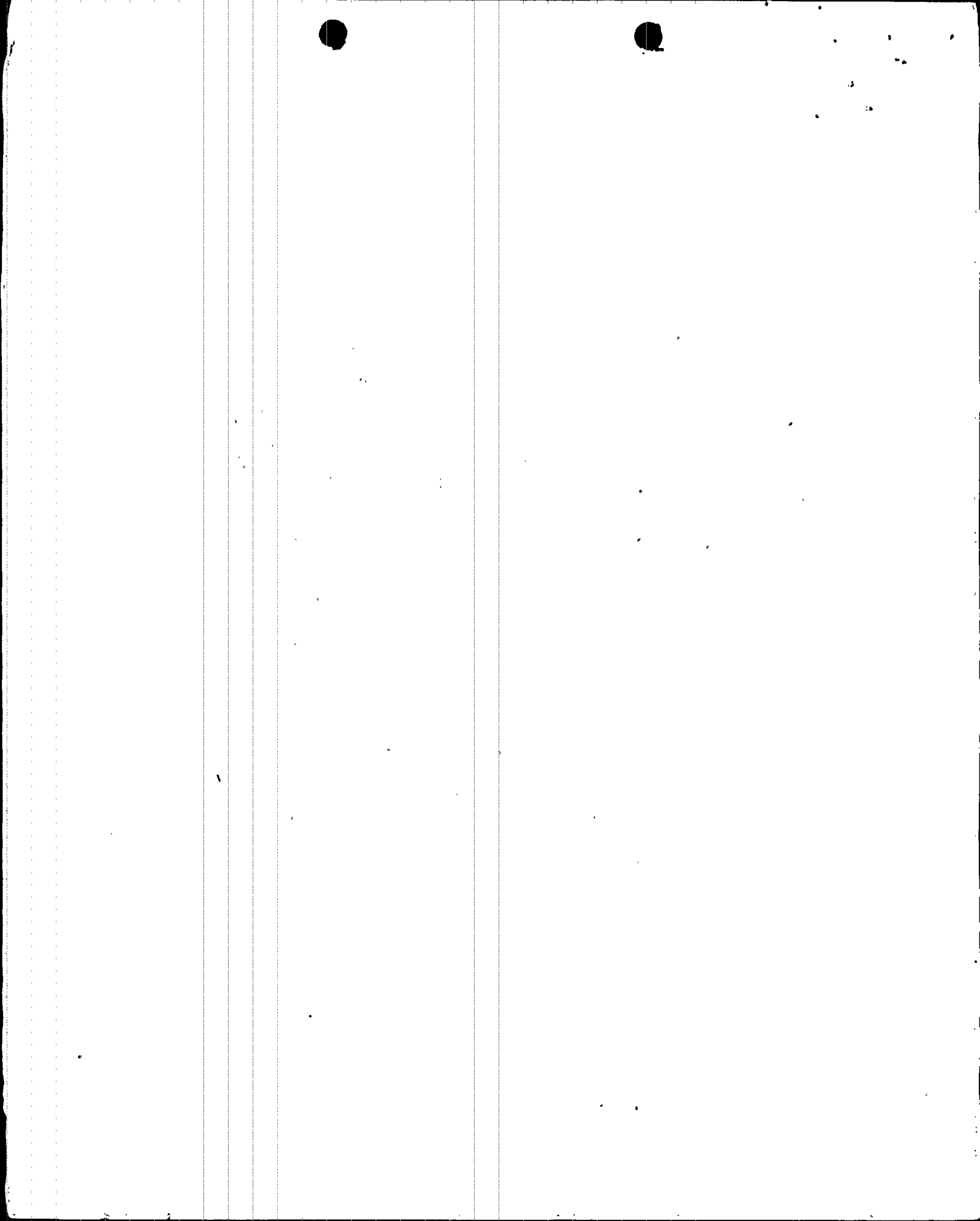
A study of Drs. Roy Johnson and Steven Carothers showed that these riparian strips of vegetation in the arid southwest desert possess the largest densities of non-colonial nesting species of any habitat type presently known in the U.S.

In the area downstream from the 91st Ave. sewage treatment plant vigorous tall stands of cottonwood and willow have sprung up since the '65-66 flood (photo encl.). This area is so highly esteemed by the state of Arizona that it has been proposed as one of the outstanding natural areas of this state: to be designated as the so-called Salt River Natural Area. Areas of cattails (photo encl.) provide a valuable diversity to the habitat along with mesquite, salt cedar and seep willow. Some nesting species which the Arizona birdwatcher hopes to encounter in this scarce wetlands habitat are the following: *Great Blue Heron (historical), *Green Heron, *Black-crowned Night Heron, *Least Bittern, Cinnamon Teal, *Ruddy Duck, *Yuma Clapper Rail (endangered), Common Gallinule, *American Avocet, *Black-necked Stilt, Willow Flycatcher, *Long-billed Marsh Wren, Bell's Vireo, Lucy's Warbler, Yellow-breasted Chat, Summer Tanager, Blue Grosbeak, *Song Sparrow. Mention should be made of the excellent nesting and cover which this type of habitat provides for dove and quail.

Only the about-to-be-flooded Orme Damsite possesses similar quality wetlands habitat in central Arizona or Maricopa County. For example, the Yellow-billed Cuckoo has almost been eradicated from California as a result of the loss of river bottom habitat: the same type of habitat which PVNGS will be suppressing. Yuma Clapper Rails have already moved into this area of the Salt-Gila though not regularly. If suitable stretches of effluent-watered river bottom wetlands and marshy areas were permitted to flourish, its occurrence would be optimized.

In the winter these same riparian areas of the Gila provide cover for a large variety of migratory water birds and passerine species. This is borne out by the fact that the Phoenix annual Christmas bird count, for the past three years, has led the nation with more species of birds identified in its 15 mile diameter circle than any other inland Christmas count area in the U.S. The heart of this circle is the superb riparian

*nesting only sparingly elsewhere in central Arizona.



June 26, 1975

habitat on the Salt-Gila which has resulted from the copious releases of metropolitan sewage effluent.

The DES is not providing any meaningful information by listing the species of birds which are currently found on the site where the plant is to be situated. These are for the most part very common birds found throughout this state in the Sonoran desertscrub vegetative community.

On the other hand the DES does ignore the significant ecological avifaunal impacts which will result from the diversion of effluent waters which would otherwise have been discharged into the Gila. There should be an evaluation of those species encountered in the riparian reach of the Gila between 91st Ave. and Gillespie Dam and the impact of PVNGS upon each of those species.

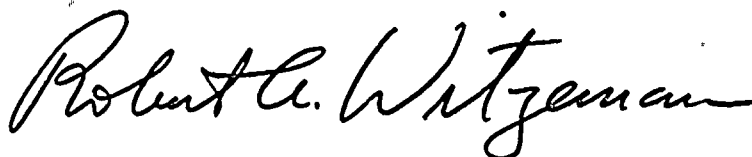
If the Buckey Irrigation District were to tie-in with the PVNGS conduit, abandoning their Bullard Rd canal heading, the PVNGS would pose a serious threat to the integrity of the riparian habitat from 91st Ave. to Bullard Rd. Should such a tie-in occur, there would no longer be any assurance that the riparian habitat would extend as far as Bullard Rd. The modest 7300 AF entitlement of the Arizona Game and Fish Commission the 1200 AF U.S. Water Conservation Laboratory entitlement, and the miniscule 200 AF commitment to the Arizona Beagle Club would hardly be likely to maintain quality vegetation in the present 91st Ave. to Bullard Rd. stretch. The DES should address itself to this possibility and it should discuss the profound ecological impact of such a tie-in.

The DES should also consider the impact of the contract by the Roosevelt Irrigation District for 20,000 AF of tertiary effluent from the 23rd Ave. sewage treatment plant. The reduced 23rd Ave. contributions to 91st Ave have not been incorporated into the figures and charts presented in section 5.5.1.1.

If this nuclear plant continues to devour additional increments of effluent as the city continues to grow, it will constitute a great loss for a unique wildlife resource. These increments of water could have made an outstanding contribution to the quality and viability of the Fred J. Weiler Green Belt.

Thank you for the opportunity to provide commentary on this nuclear project. We look forward to discussing these matters with you at any time.

Sincerely yours,



Robert A. Witzeman, M.D., President

Enclosed: Two photographs. Please reproduce these and their captions.

