



October 28, 2019

VIA ELECTRONIC FILING

Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Salt Trail Canyon Pumped Storage Project

Project No: 14992-000

Dear Secretary Bose:

Enclosed for electronic filing in the above-captioned proceeding, please find the Notice of Intervention of the Arizona Game and Fish Department on behalf of the Arizona Game and Fish Commission.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ty E. Gray", is written over a horizontal line.

Ty E. Gray
Director, Arizona Game and Fish Department and
Secretary, Arizona Game and Fish Commission

Enclosures

cc: All Parties on Service List

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Salt Trail Canyon Pumped Storage Project

Project No: 14992-000

**NOTICE OF INTERVENTION OF THE ARIZONA GAME AND FISH
DEPARTMENT**

Pursuant to 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission” or “FERC”), 18 C.F.R. §§ 385.214(a)(2), the Arizona Game and Fish Department (“Department”) respectfully requests intervention as of right in the application by Pumped Hydro Storage, LLC for a Preliminary Permit for the Salt Trail Canyon Pumped Storage Project, Navajo County, Arizona. In support of this Notice, the Department states:

I. COMMUNICATIONS

All correspondence, communications, pleadings and other documents relating to this proceeding should be served upon the following person:

David A. Weedman, Aquatic Habitat Program Supervisor
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, AZ 85086
Email: dweedman@azgfd.gov

II. IDENTIFICATION OF PARTY

The Arizona Game and Fish Department (Department) is a state fish and wildlife agency with statutory management authority for fish and wildlife resources (Title 17, Arizona Revised Statutes). The Arizona Game and Fish Commission (Commission) establishes broad policies and programs for the management, preservation and harvest of wildlife and is responsible for the enforcement of laws for the protection of wildlife.

III. INTEREST OF THE DEPARTMENT

This proceeding involves a proposed pumped water storage project in the Little Colorado River in Navajo County, near Cameron, Arizona. The project is an open-loop pumped hydropower facility due to the ~228 cfs flowing through the Little Colorado River at the proposed lower dam site. Project facilities may include: (1) A new 140-foot-high, 1,000-foot-long lower dam and reservoir with water storage of 6,750 ac-ft; (2) a new 240- foot-high, 500-foot-long upper dam and reservoir with water storage of 6,000 ac-ft; (3) six 250-megawatt, turbine-generator units, for a total installed capacity of 1,500 megawatts; (4) a powerhouse with 2 penstocks 8,000 feet long and 25' diameter; (5) a new 20 mile-long 500-kilovolt transmission line from the powerhouse to the Moenkopi switchyard; and (6) appurtenant facilities. The proposed project would have an average annual generation of 3,300 gigawatt- hours. Water will be conveyed from the upper reservoir with a water surface elevation of 5,360' above mean sea level (amsl) to the lower reservoir with a water surface elevation of 3,050' amsl.

As the state's wildlife management agency, the Department has both sovereign and proprietary interests in determining the impacts, direct, indirect, and cumulative, to

federally-listed and state trust wildlife species as a result of the proposed project. The Department has a unique interest in the protection and conservation of land and water resources for all wildlife species in the state, including federally-endangered species endemic to the Little Colorado River.

The Little Colorado River supports the only remaining population of the endangered Humpback Chub in the lower Colorado River Basin through spawning and recruitment, with young dispersing throughout the Colorado River in the Grand Canyon. The Department has invested substantial public funds to conserve and protect the Humpback Chub in the lower Colorado River Basin.

The Department's interests cannot be represented by any other party in this matter and its involvement in this proceeding will promote the public interest.

V. CONCLUSION

WHEREFORE, the Arizona Game and Fish Department requests that the Commission grant it intervention as of right in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ty E. Gray", is written over a horizontal line.

Ty E. Gray
Director, Arizona Game and Fish Department and
Secretary, Arizona Game and Fish Commission
5000 West Carefree Highway
Phoenix, Arizona 85086
(602) 942-3000

Dated: October 28, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Notice of Intervention upon each person designated on the official service list in this proceeding as compiled by the Secretary of the Federal Energy Regulatory Commission.

Dated at Phoenix, Arizona this 6th day of November, 2019.



David Weedman

