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Ms. Rochelle Robles
Public Utility Commission
P.O. Box 13326
Austin, TX 78711-3326

RE: PUC Docket No. 52485: Application of Southwestern Public Service Company to Amend its Certificate of Convenience and Necessity to Convert Harrington Generating Station from Coal to Natural Gas, Potter County, Texas

Dear Ms. Robles:

The Texas Parks and Wildlife Department (TPWD) has received and reviewed the Environmental Assessment (EA) regarding the above-referenced proposed natural gas pipeline project. TPWD offers the following comments and recommendations concerning this project.

Please be aware that a written response to a TPWD recommendation or informational comment received by a state governmental agency may be required by state law. For further guidance, see the Texas Parks and Wildlife Code, Section 12.0011. For tracking purposes, please refer to TPWD project number 47298 in any return correspondence regarding this project.

Project Description

Southwestern Public Service Company (SPS) is proposing to construct approximately 22 miles of new 20-inch diameter natural gas pipeline and associated ancillary facilities in Potter County, Texas. Construction of the pipeline will require a 100-foot-wide construction right-of-way (ROW) over the entire length of the pipeline consisting of a 50-foot-wide permanent easement/ROW and a 50-foot-wide temporary workspace. The proposed pipeline is intended to serve the 1,018-megawatt Harrington Generating Station in support of the plant's conversion from coal to natural gas. SPS contracted with POWER Engineers, Inc. (POWER) to prepare an EA to support SPS' application to amend its Certificate of Convenience and Necessity (CCN).

Recommendation: TPWD provided information and recommendations regarding the preliminary study area for this project to POWER on June 1, 2021. This letter is included in Appendix B of the EA. Please review the TPWD correspondence in Appendix B and consider the recommendations provided, as they remain applicable to the project as proposed.

Potential Pipeline Routes

SPS and POWER identified four potential pipeline routes. Information used to identify the potential pipeline routes included:

- Input received from correspondence with local officials, regulatory agencies, and others
- Aerial photography
- Findings of various data collection activities
- Environmental and land use constraints data
- Apparent property boundaries
- Existing compatible linear land use opportunities
- Location of existing development

The total length of the potential pipeline routes varies from approximately 19.01 to 21.81 miles. None of the potential pipeline routes are proposed to collocate with existing pipeline ROW. A recommended pipeline route was not selected by SPS and POWER in the CCN application or the EA.

TPWD's Recommended Route

The EA did not include information based on field surveys to determine which pipeline route would best minimize impacts to important, rare, and protected species. Therefore, TPWD's routing recommendation is based solely on the natural resource information provided in the CCN application and the EA, as well as publicly available information examined in a Geographic Information System (GIS).

In addition to the review of the EA and publicly available GIS data, TPWD evaluated potential impacts to fish and wildlife resources using the following criteria from Table 4-1 in the EA:

- Total length
- Upland grassland/savannah crossed
- Upland bushland or shrubland crossed
- Bottomland/riparian brushland or shrubland crossed
- Pasture/rangeland crossed
- Wetlands crossed
- Streams crossed
- Highly erodible soils crossed
- Poor revegetation potential soils crossed

Recommendation: After evaluation of the four routes filed with the CCN, **Route 2** appears to be the route that causes the least adverse impacts to natural resources based primarily on the following factors that **Route 2**:

- Is the shortest route, 19.01 miles (All routes 19.01 to 21.81 miles)
- Has the shortest length across pasture/rangeland, 11.8 miles (All routes 11.8 to 15.1 miles)
- Has the shortest length across bottomland/riparian brushland or shrubland, 11.8 miles (All routes 11.8 to 15.1 miles)

- Crosses the least amount of highly erodible soils, 0.2 acres (All routes 0.2 to 1.2 acres)
- Crosses the least amount of poor revegetation potential soils, 4.0 acres (All routes 4.0 to 24.6 acres)

Implementation of Beneficial Management Practices (BMPs)

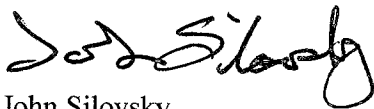
A review of the EA indicates that a portion of the information and recommendations provided in TPWD's June 1, 2021, scoping letter were acknowledged; however, the EA did not address several of the beneficial management practices (BMP) recommended to avoid or minimize potential impacts to fish and wildlife resources.

Recommendation: TPWD recommends SPS and the PUC utilize the following BMP, which are more fully described in TPWD's June 1, 2021 letter, when specifically applicable to the project:

- Use sediment control fence to exclude wildlife from the construction area
- Use wildlife escape ramps in trenches and excavation areas and inspect for trapped wildlife prior to backfilling
- Avoid the use of erosion control blankets containing polypropylene fixed-intersection mesh
- Utilize a biological monitor during construction
- Survey for active bird nests and avoid disturbance until fledged
- Survey for black-tailed prairie dog colonies
- Allow wildlife to safely leave the site on their own, without harassment or harm
- Use a TPWD-permitted individual to translocate state-listed threatened species that will not readily leave the site on their own
- Revegetate and maintain ROW with native vegetation for the benefit of wildlife, including pollinators

TPWD appreciates the opportunity to review and comment on this EA. If you have any questions, please do not hesitate to contact Habitat Assessment Biologist Mr. Rick Hanson by email at richard.hanson@tpwd.texas.gov or by phone at (806) 761-4936. Thank you for your favorable consideration.

Sincerely,



John Silovsky
Wildlife Division Director

JS:RH:bdk

cc: Mr. Jeremiah Cunningham, SPS