

United States Department of the Interior

Fish and Wildlife Service

Arizona Ecological Services Office

9828 North 31st Avenue Phoenix, Arizona 85051

Telephone: (602) 242-0210 Fax: (602) 242-2513



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DEPARTMENT OF **ENVIRONMENTAL QUALITY**

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September 11, 2017

Mr. Rupesh Patel PDEQ Air Permit Engineering Manager Pima County Environmental Quality 33 N. Stone Ave., Suite700 Tucson, Arizona 85701-1429

Dear Mr. Patel,

Thank you for your correspondence of August 28, 2017 requesting our review and concurrence for the Section 7 Analysis in Support of Significant Deterioration (PSD) Authorization and Significant Revision to Class I Air Quality Permit for Irvington Generating Station. Tucson Electric Power is proposing to install ten reciprocating internal combustion engines at the existing Irvington Generating Station (the proposed action), located on private land in the City of Tucson, north of Interstate 10 and east of Alvernon. We have reviewed the materials you provided in your August 28th correspondence.

We found that the section 7 analysis was well done and included the appropriate identification of potentially affected species and critical habitats. The appropriate types of modeling were applied and explained in the document. The conclusions of the analysis appear reasonable based on the information presented in the section 7 analysis. Based on our review, we concur with the conclusion of the Section 7 analysis that the proposed action will not affect any species or critical habitats listed under the Endangered Species Act.

We appreciate the opportunity to review and provide input on the proposed action. Please contact me at (520) 670-6150 (x242) if you have any further questions or need any further assistance. Thank you for your consideration of endangered species.

Sincerely

Steven L. Spangle

Field Supervisor

cc (hard copies):

Field Supervisor, Fish and Wildlife Service, Phoenix, AZ (2 copies) Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ

cc (electronic copies):

Habitat Branch Chief, Arizona Game and Fish Department, Phoenix, AZ (pep@azgfd.gov) Regional Supervisor, Arizona Game and Fish Department, Tucson, AZ (Attn: John Windes)

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