Chapter 8

DRAFT EIS COMMENTS AND RESPONSES

8.1 INTRODUCTION

The BLM and Western published an NOA for the Draft EIS/RMPA in the Federal Register on April 11, 2014. The NOA announced the release of the Draft EIS and the beginning of a 90-day comment period. This chapter provides public comments received by the BLM and Western in response to publication of the Draft EIS, and the BLM's and Western's responses to those comments. The information in this chapter did not exist in the Draft EIS.

A total of 89 comment submittals (letters, emails, commenters at hearings) was provided to the BLM and Western during the 90-day comment period. All comments on the Draft EIS were given careful consideration with necessary changes incorporated into this Final EIS. Comments are transcribed below in table 8-1 as they were received. The comments are sorted by resource category (see "Document Abbreviations") in the order in which they occur in the EIS.

As noted in section 5.2.4, the BLM and Western sent outreach letters to property owners within ½ mile of route variation alignments east of Willcox Playa in Cochise County and south of Tucson International Airport along Old Vail Connection Road in Pima County. The purpose of the outreach letters was to notify the property owners of the new route variations (see sections 1.12.2 and 2.7) that were added to the EIS analysis. A total of 35 comment submittals and inquiries (letters, emails, phone calls) was provided to the BLM and Western. As with comments during the 90-day comment period, these comments are transcribed below in table 8-1 as they were received and are addressed in the Final EIS (see comments starting with number 799).

8.2 RESPONSE TO COMMENTS

In responding to comments, every effort was made to address all questions, concerns, and other points presented by the commenter. Table 8-1 presents all of the comments that were received on the Draft EIS. It includes the comment letter number, commenter name, the specific comment, and the BLM's and Western's response to the comment. Comments have been recorded verbatim as they were received.

Not all comments in table 8-1 resulted in text changes that appear in the Final EIS. The "Agency Response to Comments" provided by BLM and Western, in many cases, refers to information that was already contained in the Draft EIS, or provides an explanation and/or clarification regarding why a text change to the document was not required. If a response indicates that information was presented in the Draft EIS, please note that the information is also included in the Final EIS. If a section of the Draft EIS is referenced in table 8-1, the information can be found in the Final EIS in the same section unless otherwise noted. Where the "Agency Response to Comments" warranted revising text in the EIS, the agency response refers to a corresponding section, figure or table, and unless otherwise noted, revisions were made as suggested by the commenter or comment. Please note that page numbers in the Final EIS are likely different from those in the Draft EIS.

The following is a list of comment type codes that were used to indicate each comment's associated resource or concern.

Order in Table 8-1	Document Abbreviations	Comment ID
1	1-AIR	Air Quality
2	15-NOISE	Noise and Vibration
3	4-GEO	Geology and Minerals
4	14-SOIL	Soil Resources
5	10-PALEO	Paleontological Resources
6	20-WATER	Water Resources
7	2-BIO	Biological Resources (Vegetation and Wildlife)
8	3-CUL	Cultural Resources
9	19-VIS	Visual Resources
10	7-LAND	Land Use (Farm/Range/Military)
11	12-SD	Special Designations
12	21-WILD	Wilderness Characteristics
13	11-REC	Recreation
14	13-SOCI	Socioeconomics and EJ
15	16-PHS	Public Health and Safety
16 (no comments received)	5-HAZ	Hazardous Materials
17	17-TRANS	Transportation
18 (no comments received)	6-IDA	Intentional Acts of Destruction
19	18-TRAIL	National Scenic and Historic Trails Assessment
20	9-NEPA	NEPA/Process
21	8-MISC	Miscellaneous (support/non-support)

Table 8-1. Comments on the Draft EIS and Agency Response

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
31	14	14	New Mexico Department of Environmental Quality	Nelson	1-AIR	AQB concurs with the statements in the draft EIS regarding air quality impacts, regulatory requirements and the use of best management practices (BMPs) during construction. The AQB appreciates the opportunity to participate in this review process and anticipates commenting on the Final EIS and RMP Amendment	Thank you for your comment.
166	32	32.12	EPA	Jansky/Weeks	1-AIR	Additional mitigation measures; page 606. This section notes that emissions related to construction impacts will be minimized through best management practices (bmp's) and other mitigation measures. Recommendation: EPA recommends that a Construction Emissions Mitigation Plan (CEMP) be developed for the project, and in addition to all applicable local, state, or federal requirements, the following mitigation measures be included in the CEMP in order to reduce air quality impacts associated with emissions of NOx, CO, PM, S02, and other pollutants from construction-related activities: Fugitive Dust Source Controls: Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions; • Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and • Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to I 0 mph. Mobile and Stationary Source Controls: • Plan construction scheduling to minimize vehicle trips; • Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections; • Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed; • If practicable, utilize new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible; • Lacking availability of non-road construction equipment that meets Tier 4 engine standards, the responsible agency should commit to using EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and • Consider alternative fuels and energy sources such as natural gas and electricity (plug-in or battery). Administrative controls: • Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking; • Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips; and • Identify sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).	A Construction Emissions Mitigation Plan (CEMP) would be part of the Erosion, Dust Control, and Air Quality Plan within the POD. See table 2-8 of the EIS for reference to the CEMP and appendix N of the EIS for the draft NEPA POD. The suggested mitigation measures would be considered in the CEMP.
174	34	34.1	ADEQ	Arnst	1-AIR	The part of your project in Pima County is located in a maintenance are for carbon monoxide (CO) and a nonattainment area for I O-micron particulate matter (PM10). As described, it may have a de minimis impact on air quality.	This information was stated and acknowledged in sections 3.2 and 4.2 (Air Quality) of the Draft EIS.
175	34	34.2	ADEQ	Arnst	1-AIR	Disturbance of particulate matter is anticipated during construction. Considering prevailing winds, to comply with other applicable air pollution control requirements and minimize adverse impacts on public health and welfare, the following information is provided for consideration	Particulate matter disturbance and prevailing winds were discussed and acknowledged in sections 3.2 and 4.2 (Air Quality) of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
176	34	34.3	ADEQ	Arnst	1-AIR	REDUCE DISTURBANCE of PARTICULATE MATTER during CONSTRUCTION. This action, plan or activity may temporarily increase ambient particulate matter (dust) levels. Particulate matter 10 microns in size and smaller can penetrate the lungs of human beings and animals and is subject to a National Ambient Air Quality Standard (NAAQS) to protect public health and welfare . Particulate matter 2.5 microns in size and smaller is difficult for lungs to expel and has been linked to increases in death rates; heart attacks by disturbing heart rhythms and increasing plaque and clotting; respiratory infections; asthma attacks and cardiopulmonary obstructive disease (COPD) aggravation. It is also subject to a NAAQS. The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site: I. Site Preparation and Construction A. Minimize land disturbance ; B. Suppress dust on traveled paths which are not paved through wetting , use of watering trucks, chemical dust suppressants , or other reasonable precautions to prevent dust entering ambient air; C. Cover trucks when hauling soil; D. Minimize soil track-out by washing or cleaning truck wheels before leaving construction site; E. Stabilize the surface of soil piles; and F. Create windbreaks. II. Site Restoration A. Revegetate any disturbed land not used; B. Remove unused material; and C. Remove soil piles via covered trucks.	These measures are included in table 2-7 in chapter 2 of the Draft EIS (now table 2-8 in the Final EIS). Sections 3.2 and 4.2 (Air Quality) have been revised in the EIS to include this information.
177	34	34.4	ADEQ	Arnst	1-AIR	The following rules applicable to reducing dust from open areas, dry washes or riverbeds , roadways and streets are enclosed. Arizona Administrative Code R 18-2-604 and R 18-2-605 and Arizona Administrative Code R18-2-804.	Table 2-8 in chapter 2, as well as section 3.2 (Air Quality), has been revised in the EIS to include this information.
389	68	68.66	Pima County	Bernal/Connolly	1-AIR	Item 2. Section – Executive Summary: ES. 7 Affected Environment, Issues, and Environmental Impacts: ES. 7.1 Air Quality. Page, Line – xx, 7, 16. Comment: Potential air quality impacts from ground-disturbing activities should be minimized. Resolution: In accordance with Pima County Code Title 17 fugitive dust emissions from construction activities should be controlled.	The executive summary of the EIS includes additional information on Pima County's air quality permitting requirements. Pima County requirements were discussed in section 3.2, table 3.2-4, and appendix B of the Draft EIS.
390	68	68.67	Pima County	Bernal/Connolly	1-AIR	Item 3. Section – Chapter 1: Section 1.13.1 Resource Issues. Page, Line – 29, Table 1-8. Comment: Additional impacts on non-attainment from carbon monoxide and smaller particulate matter in the air such as particulate matter 10 (PM10). Resolution: This would need to be rewritten to specify that mitigation measures would need to be used to minimize the potential additional impacts on non-attainment of any of the criteria pollutants. Or that there are “possible increases in certain criteria pollutants associated with the project.”	Section 1.13.1 of the Draft EIS only summarized those issues identified during scoping for the purpose of analysis; revisions to these issues are not appropriate to clarify here. Impacts such as possible increases to criteria pollutants are addressed in section 4.2 of the Draft EIS.
391	68	68.68	Pima County	Bernal/Connolly	1-AIR	Item 4. Section – Chapter 2: Section 2.4.1 Site Preparation and Preconstruction Activities: Framework Plans. Page, Line – 42, 24-41. Comment: PDEQ would like a copy of the Erosion, Dust Control, and Air Quality Plan to verify that the project is including the applicable Pima County Air Quality rules and regulations. Resolution: PDEQ would like a copy of the Erosion, Dust Control, and Air Quality Plan to verify that the project is including the applicable Air Quality rules and regulations.	Section 2.4.1 of the EIS has been revised to clarify that agencies like Pima County would be incorporated into the development of Framework Plans, as appropriate.
392	68	68.69	Pima County	Bernal/Connolly	1-AIR	Item 5. Section – Chapter 2: Section 2.4.1 Site Preparation and Preconstruction Activities: Framework Plans: Erosion, Dust Control, and Air Quality Plan. Page, Line – 45, 4-10. Comment: The Erosion, Dust Control, and Air Quality Plan should contain the appropriate references to Pima County Code Title 17. Resolution: The Erosion, Dust Control, and Air Quality Plan should contain the appropriate references to Pima County Code Title 17. Pima County Code Title 17 includes rules regarding the control of fugitive dust emissions from construction activities, as well as from portable stationary sources, including concrete batch plants.	Section 2.4.1 of the EIS has been revised to clarify that agencies like Pima County would be incorporated into the development of Framework Plans, as appropriate. Applicable County Plans, Laws, Ordinances, Regulations, and Standards Related to Air Quality, including Pima County, were discussed in chapter 3 of the Draft EIS (see table 3.2-4).
393	68	68.70	Pima County	Bernal/Connolly	1-AIR	Item 6. Section – Chapter 3: Section 3.2.2 Laws, Ordinances, Regulations, and Standards: Federal: Clean Air Act and National Ambient Air Quality Standards. Page, Line – 190, 10-13. Comment: The sentence for criteria pollutants needs to be revised for Particulate Matter 2.5 microns. Resolution: The PM standard for PM 2.5 is for particulate matter equal to or less than 2.5 microns in diameter.	Section 3.2.2 of the EIS has been revised based on this comment.
394	68	68.71	Pima County	Bernal/Connolly	1-AIR	Item 7. Section – Chapter 3: Section 3.2.2 Laws, Ordinances, Regulations, and Standards: Federal: Clean Air Act and National Ambient Air Quality Standards. Page, Line – 193, 10-11. Comment: HAPS are regulated by the National Emissions Standards for Hazardous Air Pollutants not because they did not meet specific criteria for the development of the National Ambient Air Quality Standards (NAAQS), but because the Clean Air Act authorizes the regulations of airborne toxic air pollutants and developing risk-based standards for each HAP is a difficult task. Instead EPA approaches HAPs with control technologies rather than set standards. Resolution: This sentence should be revised to include specific reference to the Clean Air Act and the NESHAP program.	Section 3.2.2 of the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
395	68	68.72	Pima County	Bernal/Connolly	1-AIR	Item 8. Section – Chapter 3: Section 3.2.2 Laws, Ordinances, Regulations, and Standards: State and Local Regulations. Page, Line – 194, 10-11. Comment: Arizona does not have additional ambient air quality standards. Pima County incorporates the NAAQS by reference and has statutory authority to operate the air quality programs. Resolution: This sentence needs to be revised.	Section 3.2.2 of the EIS has been revised based on this comment.
396	68	68.73	Pima County	Bernal/Connolly	1-AIR	Item 9. Section – Chapter 3: Section 3.2.2: State and Local Regulations, Arizona. Page, Line – 197, 13-35. Comment: This section is completely inaccurate and needs to be rewritten. Pima County does not have an agreement with the Arizona Department of Environmental Quality (ADEQ) for air quality regulations. Pima County has statutory authority pursuant to Arizona Revised Statute 49-402 (A.R.S. 49-112). Also, Pima County incorporates the NAAQS by reference. Resolution: This section needs to be rewritten to accurately depict State and Local authority. Including, but not limited to, statutory authority of the Pima County Air Pollution Control District.	Section 3.2.2 of the EIS has been revised based on this comment.
397	68	68.74	Pima County	Bernal/Connolly	1-AIR	Item 10. Section – Chapter 3: Section 3.2.2: State and Local Regulations, Arizona. Page, Line – 198, 1-6. Comment: This paragraph is out of context and needs to have explanation. Will the project be using a local concrete batch plant with an existing permit that would only operate within Pima County, a portable concrete batch plant with an existing permit through ADEQ, or will a new concrete batch plant be constructed that would necessitate application for the appropriate air quality permit? Resolution: PDEQ is the Air Quality permitting authority for sources of air pollution within Pima County. Concrete batch plants can obtain an Authorization to Operate under an ADEQ General permit within Pima County. If a portable plant from outside Pima County (that is permitted through the State of Arizona) will be used for the project permitting of the plant should be verified with PDEQ before construction/operation, and proper notification should be given for the location of the plant within Pima County.	Section 3.2.2 of the EIS has been revised based on this comment.
398	68	68.75	Pima County	Bernal/Connolly	1-AIR	Item 11. Section – Chapter 3: Section 3.2.2: State and Local Regulations, County. Page, Line – 198, 14-15. Comment: Table 3.2-4 will need to be updated. Pima County incorporates the NAAQS by reference. Resolution: Pima County does not have the same Ambient Air Quality Standards as ADEQ because Pima County incorporates the NAAQS by reference. Also, PDEQ is the Air Quality permitting authority for stationary sources of air pollution within Pima County, including concrete batch plants.	Section 3.2.2 of the EIS has been revised based on this comment.
399	68	68.76	Pima County	Bernal/Connolly	1-AIR	Item 12. Section – Chapter 3: Section 3.2.3 Issues to be Analyzed: Pima County Arizona. Page, Line – 203, 4. Comment: Summerhaven does not have a current maintenance plan, per the EPA SIP. Resolution: This sentence needs to be removed.	Section 3.2.3 of the EIS has been revised based on this comment.
400	68	68.77	Pima County	Bernal/Connolly	1-AIR	Item 13. Section – Chapter 3: Section 3.2.4 Analysis Area Conditions: Background Air Quality. Page, Line – 204, 10. Comment: The project should also identify air quality monitors operated by the Pima County Department of Environmental Quality that are within or near the vicinity of the air quality analysis area. Resolution: This section should state that PDEQ operates air quality monitors within Pima County including monitors which collected data presented in Appendix B.	Section 3.2.4 of the EIS has been revised based on this comment.
401	68	68.78	Pima County	Bernal/Connolly	1-AIR	Item 14. Section – Chapter 3: Section 3.2.4 Analysis Area Conditions: Regional Air Emissions Sources. Page, Line – 204, 16-25. Comment: Regional Air Emission Sources section needs to be rewritten as the sources listed in Table 3.2-5 are not PSD sources. Existing sources in Pima County that are Major Sources that have potential PSD emissions should be listed. Table 3.2-5 needs to be revised because the sources listed are Major sources, not PSD sources. Resolution: In Pima County "Major" means emitting or having the potential to emit 100 tons per year (tpy) or more of any criteria pollutant for the specific source categories listed in the PSD regulations. There are 28 listed source categories, which include power plants that use steam to generate electricity, petroleum refineries and glass fiber processing plants. If a plant does not fall into one of the listed source categories, then a threshold of 250tpy applies. The author should consult with the PDEQ Air Quality Permitting Section to determine the correct Major sources to list. The CalPortland Rillito Cement Plan is permitted through the Arizona Department of Environmental Quality and the author should contact ADEQ to determine if the CalPortland Rillito Cement Plant is a PSD source, or a Major source.	Section 3.2.4 of the EIS has been revised based on this comment.
402	68	68.79	Pima County	Bernal/Connolly	1-AIR	Item 15. Section – Chapter 3: Section 3.2.4 Analysis Area Conditions. Page, Line – 205, 5. Comment: This section should include a discussion regarding the CO2 equivalence of the SF6 emissions from the proposed substations. Resolution: Sulfur hexafluoride (SF6) is considered a potent greenhouse gas and as such the emissions of the SF6 from the substations should be discussed.	Section 3.2.4 of the EIS has been revised based on this comment.
403	68	68.80	Pima County	Bernal/Connolly	1-AIR	Item 16. Section – Chapter 4: Section 4.1.2 Cumulative Effects. Page, Line – 578, 24-25. Comment: Cumulative Impacts are discussed in detail in section 4.21, not 4.20 as stated. Resolution: This section needs to be rewritten to accurately depict applicable rules and regulations.	Section 2.2 of the EIS has been revised to indicate that section 4.21 is the discussion of cumulative effects.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
404	68	68.81	Pima County	Bernal/Connolly	1-AIR	Item 17. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 580, 21-25. Comment: This is inaccurate; the predicted emissions should be compared to the NAAQS. The standards the Draft EIS attributes to the State are inaccurate because Pima County incorporates the NAAQS by reference into Pima County Code Title 17. Resolution: This section needs to be rewritten to accurately depict applicable rules and regulations.	The proposed Project is also located in New Mexico, which has additional ambient air quality standards. The NMAAQS are additional ambient air quality standards applicable in the analysis area, as discussed in section 4.2.1 of the Draft EIS.
405	68	68.82	Pima County	Bernal/Connolly	1-AIR	Item 18. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 580, 32-41. Comment: Fugitive dust emissions should be minimized and controlled to meet requirements of Pima County Code Title 17. Resolution: This section should be revised so that fugitive dust emissions are minimized by control measures and controlled to meet requirements of Pima County Code Title 17.	Section 4.2.1 of the EIS has been revised based on this comment.
406	68	68.83	Pima County	Bernal/Connolly	1-AIR	Item 19. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 580, 35-36. Comment: Fugitive dust emissions should be minimized and controlled to meet requirements of Pima County Code Title 17. Resolution: Unpaved roads, unpaved haul/access roads, and staging areas affected by the project should be stabilized when in use and following use until the area becomes permanently stabilized by paving, landscaping or otherwise in order to control fugitive dust emissions, including windblown dust, or dust caused by vehicular traffic on the area pursuant to (sentence left incomplete)	Section 4.2.1 of the EIS has been revised based on this comment.
407	68	68.84	Pima County	Bernal/Connolly	1-AIR	Item 20. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 580, 40-41. Comment: Emissions from concrete batch plants would need to be controlled according to air quality permit conditions. Resolution: The project will need to verify that the proper air quality permit is in place for any concrete batch plants to be used within Pima County. Emissions from concrete batch plants would need to be controlled according to air quality permit conditions.	Section 4.2.1 of the EIS has been revised based on this comment.
408	68	68.85	Pima County	Bernal/Connolly	1-AIR	Item 21. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 581, 9-12. Comment: Pima County Code Title 17 covers fugitive dust emissions from construction activity in Pima County. Resolution: This section should include references to local air quality control. Pima County Code Title 17 covers fugitive dust emissions from construction activity in Pima County.	Section 4.2.1 of the EIS has been revised based on this comment.
409	68	68.86	Pima County	Bernal/Connolly	1-AIR	Item 22. Section – Chapter 4: Section 4.2.1 Introduction. Page, Line – 581, 11-12. Comment: Fugitive dust emissions should be minimized and controlled to meet requirements of Pima County Code Title 17. Resolution: Unpaved roads, unpaved haul/access roads, and staging areas affected by the project should be stabilized when in use and following use until the area becomes permanently stabilized by paving, landscaping or otherwise in order to control fugitive dust emissions, including windblown dust, or dust caused by vehicular traffic on the area pursuant to (sentence left incomplete)	Section 4.2.1 of the EIS has been revised based on this comment.
410	68	68.87	Pima County	Bernal/Connolly	1-AIR	Item 23. Section – Chapter 4: Section 4.2.2 Methodology and Assumptions: Analysis Assumptions. Page, Line – 581, 30-39. Comment: Assumptions for fugitive dust emissions should also list what control measures were assumed for any fugitive dust generating activities. Also, estimates for emissions from concrete batch plants would need to include a list of control measures assumed. Resolution: Emissions estimates for the emissions inventory should also list what control measures were assumed.	Appendix B in the Draft EIS contains assumptions used in the analysis and has been updated based on this comment.
411	68	68.88	Pima County	Bernal/Connolly	1-AIR	Item 24. Section – Chapter 4: Section 4.2.3 Impacts Analysis Results: Impacts Common to All Action Alternatives: Construction. Page, Line – 586, 15-18. Comment: If fugitive dust emissions are included in off-site visibility impacts at Saguaro National Park Class I area, the Project should reevaluate the impacts with control measures for fugitive emissions. Pima County Code Title 17 states that "No person shall cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter." Resolution: The Project will need to comply with Pima County Code Title 17 fugitive dust provisions. Visible fugitive dust emissions should not cross property boundary. There should be no impact at Saguaro National Park East due to visible fugitive dust emissions from the Project.	Section 4.2.3 of the EIS has been revised based on this comment.
412	68	68.89	Pima County	Bernal/Connolly	1-AIR	Item 25. Section – Chapter 4: Section 4.2.3 Impacts Analysis Results: Route Group 3 – Apache Substation to Pantano Substation. Page, Line – 597, 32-36. Comment: Will the project be using a local concrete batch plant with an existing permit that would only operate within Pima County, a portable concrete batch plant with an existing permit through ADEQ, or will a new concrete batch plant be constructed that would necessitate application for the appropriate air quality permit? Resolution: PDEQ is the Air Quality permitting authority for sources of air pollution within Pima County. Concrete batch plants can obtain an Authorization to Operate under an ADEQ General permit within Pima County. If a portable plant from outside Pima County (that is permitted through the State of Arizona) will be used for the project permitting of the plant should be verified with PDEQ before construction/operation, and proper notification should be given for the location of the plant within Pima County.	Section 4.2.2 of the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
413	68	68.90	Pima County	Bernal/Connolly	1-AIR	Item 26. Section – Chapter 4: Section 4.2.3 Impacts Analysis Results: Route Group 3 Impacts to Ambient Air Quality. Page, Line – 600, 1-2 & 10-11. Comment: This Table is inaccurate, only the NAAQS should be listed, not Arizona Ambient Air Quality Standards. Pima County incorporates the NAAQS by reference. Resolution: The air quality authorities in Arizona, including for example the State and Pima County incorporate the NAAQS by reference. The more stringent NAAQS apply to these areas despite the lag in updating the State rules or Local Code (Pima County Code Title 17).	Section 4.2.3 of the EIS has been revised based on this comment.
414	68	68.91	Pima County	Bernal/Connolly	1-AIR	Item 27. Section – Chapter 4: Section 4.2.3 Impacts Analysis Results: Route Group 4 – Pantano to Saguaro. Page, Line – 602, 3-5 & 603, 1-2. Comment: Will the project be using a local concrete batch plant with an existing permit that would only operate within Pima County, a portable concrete batch plant with an existing permit through ADEQ, or will a new concrete batch plant be constructed that would necessitate application for the appropriate air quality permit? Resolution: PDEQ is the Air Quality permitting authority for sources of air pollution within Pima County. Concrete batch plants can obtain an Authorization to Operate under an ADEQ General permit within Pima County. If a portable plant from outside Pima County (that is permitted through the State of Arizona) will be used for the project permitting of the plant should be verified with PDEQ before construction/operation, and proper notification should be given for the location of the plant within Pima County.	Section 3.2.2 of the EIS has been revised based on this comment.
415	68	68.92	Pima County	Bernal/Connolly	1-AIR	Item 28. Section – Chapter 4: Section 4.2.3 Impacts Analysis Results: Route Group 4 Impacts to Ambient Air Quality. Page, Line – 604, 7-8 & 14-15. Comment: This Table is inaccurate, on the NAAQS should be listed, not Arizona Ambient Air Quality Standards. Pima County incorporates the NAAQS by reference. Resolution: The air quality authorities in Arizona, including for example the State and Pima County incorporate the NAAQS by reference. The more stringent NAAQS apply to these areas despite the lag in updating the State rules or Local Code (Pima County Code Title 17).	Section 4.2.3 of the EIS has been revised based on this comment.
416	68	68.93	Pima County	Bernal/Connolly	1-AIR	Item 29. Section – Chapter 4: Section 4.21.4 Cumulative Effects by Resource: Air Quality and Climate Change: Construction. Page, Line – 1072, 1-6. Comment: Fugitive dust emissions should be minimized and controlled to meet requirements of Pima County Code Title 17. Resolution: Fugitive dust from earth moving associated with the Project and other construction activities should be controlled in accordance with Pima County Code Title 17. Unpaved roads, unpaved haul/access roads, and staging areas affected by the project should be stabilized when in use and following use until the area becomes permanently stabilized by paving, landscaping or otherwise in order to control fugitive dust emissions, including windblown dust, or dust caused by vehicular traffic on the area pursuant to (sentence left incomplete)	Applicable county rules were addressed in section 3.2.2 of the Draft EIS.
417	68	68.94	Pima County	Bernal/Connolly	1-AIR	Item 30. Section – Appendix B: Section Supplemental Air Quality Information: State and Local Regulations: Pima County. Page, Line – B-4, 22-33. Comment: This section is inaccurate. Pima County has statutory authority pursuant to Arizona Revised Statute 49-402 (A.R.S. 49-112), as well as delegation from the US EPA for certain portions of the air quality program. Resolution: This section needs to be rewritten to accurately depict applicable rules and regulations.	Appendix B of the EIS has been revised based on this comment.
418	68	68.95	Pima County	Bernal/Connolly	1-AIR	Item 31. Section – Appendix B: Section Supplemental Air Quality Information: State and Local Regulations: Pima County. Page, Line – B-4, 28-33. Comment: This section is inaccurate. A fugitive dust activity permit is also required for blasting activities. Resolution: This section needs to be rewritten to accurately depict applicable rules and regulations.	Appendix B of the EIS has been revised based on this comment.
167	32	32.13	EPA	Jansky/Weeks	15-NOISE	Noise and Vibration. Chapter 4; page 627. All 4 route groups have noise sensitive receptors (nsr's) that will experience short-term construction noise as high as 83 a-weighted decibels (dBA). BMP's discussed in the DEIS, and in the Programmatic EIS developed for Western States Energy Corridors, are expected to reduce the noise levels below the maximum level. The DEIS also states that the project will comply with all local noise ordinances. There is not a quantitative or qualitative discussion of how much noise levels will be reduced, and if this reduction will comply with local ordinances or the Noise Pollution Control Act of 1972. Recommendation: The FEIS should include a quantitative or qualitative discussion of how much noise levels will be reduced by project bmp's.	Section 4.3 in chapter 4 in the EIS has been revised to clarify how noise levels would be reduced by project PCEMs.
170	32	32.16	EPA	Jansky/Weeks	4-GEO	Geology and Mineral Resources. Chapter 3; page 220. Line 24 of the DEIS states no earth fissures are documented in route group 1. Line 27 says route group 1 crosses approximately 227 fissures. Recommendation: For the FEIS, please clarify which information regarding fissures and route group 1 is correct.	Section 3.4 in in the EIS has been revised to clarify the number of fissures intersected by the proposed Project.
713	82	82.132	SunZia	Wray	14-SOIL	Geology and Soils The affected environment and environmental consequences for earth resources do not include analyses of impacts resulting from the construction and operation of the Southline Project, with regard to floodplain hazards, subsidence, future oil and gas leases, or future extraction of mineral resources. The absence of these studies indicates that the range of impacts was not fully analyzed and is therefore deficient. We request that this deficiency be corrected.	Data on, and impacts to, geologic hazards, including subsidence, future oil and gas leases, and future extraction of mineral resources (mining claims), was included in the Draft EIS in sections 3.4 and 4.4 (Geology and Minerals). Sections 3.7 and 4.7 (Water Resources) of the Draft EIS included information on floodplain hazards.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
706	82	82.125	SunZia	Wray	10-PALEO	Fossil localities are not discussed as part of impacts from the Southline Project. The Potential Fossil Yield Classification is the best way to assess impacts to paleontological resources, but the presence or absence of previously recorded fossil localities can help determine if classifications of 2 or 3 need to be assessed, or help in determining mitigation requirements. For example, having previously recorded fossil localities in an area mapped as Qa might suggest a further look in those sediments within the Southline Project area. Please include Fossil localities in the impact analysis. The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Available data on the Potential Fossil Yield Classification (PFYC) and known localities were used in the Draft EIS in sections 3.6 and 4.6. The PFYC maps used were shown as figures 3-6.1a and 3-6.1b in the Draft EIS (now figures 3-6.1a–d in the Final EIS). Section 4.6 of the Draft EIS described potential impacts to fossil localities. The actual location of any particular fossil site is protected from public disclosure so as to protect the site. And in no way is the PFYC system meant to imply that further research, including field surveys, would be required where proposed projects are in Category 2 or 3 areas, where the fossil potential is low to moderate or unknown, and thus finds are not expected to be made. For this proposed Project, mitigation for Category 1, 2, or 3 areas is the stipulation that all work in the vicinity of a find shall stop immediately and the local BLM office will be contacted (see table 2-8 in the Final EIS).
32	14	14	New Mexico Department of Environmental Quality	Nelson	20-WATER	The U.S. Environmental Protection Agency (USEPA) requires National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) coverage for storm water discharges from construction projects (including common plans of development) that will result in the disturbance (or re-disturbance) of one or more acres, including expansions, of total land area. Since this project will exceed one acre (including staging areas, etc.), it will require appropriate NPDES permit coverage prior to beginning construction. Among other things, this permit requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared for the site and that appropriate Best Management Practices (BMPs) be installed and maintained both during and after construction to prevent, to the extent practicable, pollutants (primarily sediment, oil & grease and construction materials from construction sites) in storm water runoff from entering waters of the U.S. This permit also requires that permanent stabilization measures (revegetation, paving, etc.), and permanent storm water management measures (storm water detention/retention structures, velocity dissipation devices, etc.) be implemented post construction to minimize, in the long term, pollutants in storm water runoff from entering these waters. In addition, permittees must ensure that there is no increase in sediment yield and flow velocity from the construction site (both during and after construction) compared to pre-construction, undisturbed conditions (see Subpart 9.4.1.1).	The comment accurately reflects the permitting requirements per NPDES as stated and acknowledged throughout the Draft EIS (see chapters 2, 3, and 4).
159	32	32.5	EPA	Jansky/Weeks	20-WATER	Wetlands/Waters of the U.S. Executive Summary; page xxii. The DEIS states "Potential impacts to water resources include the potential for discharge of pollutants, including sediment, to groundwater or surface water, the placement of larger structures within floodplains, and potential disturbance of waters of the U.S. (WUS) or wetlands." Recommendation: Change the word "or" to "including" as wetlands are considered WUS under the Clean Water Act (CWA). If there is a need to differentiate between jurisdictional wetlands and isolated wetlands or "non-jurisdictional" wetlands; then that distinction should be made.	The executive summary in the EIS has been revised based on this comment.
160	32	32.6	EPA	Jansky/Weeks	20-WATER	Chapter 2; page 46. The DEIS states "General water quality is protected under the Federal Clean Water Act (CWA), and a permit may be required if a project would result in discharges to regulated WUS. The purpose of a Stream, Wetland, Well, and Spring Protection Plan (SWWSPP) would be to describe measures to protect those resources from potential impacts during construction, operation, and maintenance activities. The plan would describe avoidance, minimization, and mitigation measures and would be intended for use as a guide to determine the appropriate site specific measures to be implemented during construction activities. Also, page 42 of the DEIS states the final Plan of Development (POD) for the SWWSPP will not be completed until after the FEIS. Recommendation: A draft POD should be made a part of the FEIS so measures for avoiding, minimizing, and mitigating impacts to aquatic resources can be reviewed and commented on. Without knowing the finalized route, having a field verified delineation of WUS, or the mitigation required to offset project impacts; it is difficult to adequately assess the environmental impacts of the proposed project.	A draft NEPA POD is available with the EIS (see appendix N).
161	32	32.7	EPA	Jansky/Weeks	20-WATER	Chapter 3; page 258. Portions of the wetlands and WUS section state that wetlands, ephemeral arroyos, special aquatic sites, and drainages exist within the analysis area, and would require protection or compensatory mitigation if permanently impacted. Recommendation: Jurisdictional wetlands and other special aquatic sites are protected under the CWA. The nature of the impact, permanent or otherwise, has no bearing on that determination. Both permanent and temporary impacts to jurisdictional waters would be addressed under Section 404 of the CWA, which requires that all practicable alternatives for avoiding and minimizing impact to WUS be made, and that all unavoidable impacts be mitigated. Please make clear in the FEIS that any impacts to wetlands will require protection or mitigation.	Section 3.7 in the EIS has been revised to make clear that a jurisdictional delineation would be completed for the selected alternative, if the ROW is approved, and that all practicable methods of avoidance to WUS would be accomplished through micro-siting. Any potential impacts would require protection or mitigation through the CWA permit process.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
162	32	32.8	EPA	Jansky/Weeks	20-WATER	Chapter 3; page 258: The DEIS states "An inventory of all wetlands within analysis area boundary from National Wetlands Inventory (NWI) maps indicates that approximately 7,639 acres of wetlands occur within the analysis area, consisting of 20 freshwater ponds (typically stock tanks), 6 lakes, 1 freshwater forested/shrub wetland, and 3 other wetland areas." Recommendation: It is evident that the NWI maps serve as the bases for determining the presence or absence of aquatic features for this document. The NWI maps provide a good starting point, however, it should be noted that NWI maps are not intended to delineate or certify the presence or absence of jurisdictional WUS. Also, NWI maps are not 100% accurate in identifying aquatic features. Prior to commencement of dredge or fill activities a field verification along the alignment should be made to accurately delineate WUS, including wetlands, should be made. This field verification should be conducted in conjunction with the Clean Water Act Section 404 permitting process.	Section 3.7 in the EIS has been revised to clarify that a WUS delineation would be completed for the selected alternative in conjunction with a Section 404 CWA permit.
168	32	32.14	EPA	Jansky/Weeks	20-WATER	Chapter 4; page 685. The new build and upgrade sections of the proposed project have unavoidable impacts to floodplains associated with placing structures in floodplains. This requires consultation with the FEMA designated floodplain administrator for the area. Recommendation: Please consult the local FEMA floodplain administrator to determine if project impacts to floodplains will remain within allowable levels. Include this consultation in the FEIS.	FEMA floodplains and local requirements were discussed in section 3.7.3 of the Draft EIS; section 4.7 in the EIS has been revised to include reference to local FEMA floodplain administrator based on this comment.
229	42	42.3	U.S. International Boundary and Water Commission	Anaya	20-WATER	The USIBWC requests that proposed construction activities be accomplished in a manner that does not change historic surface runoff characteristics at the international border. The USIBWC will not approve any construction near the international boundary in the United States that increases, concentrates, or relocates overland drainage flows into either country. This requirement is intended to ensure that developments in one country will not cause damage to lands or resources in the other country. The USIBWC will need copies of any hydrological or hydraulic studies and site specific drawings for work proposed in the vicinity of the international boundary, particularly if culverts or other structures are proposed to be constructed in any drainage courses that cross the boundary. We will also require that you assure that structures constructed along the United States/Mexico border are maintained in an adequate manner and that liability issues created by these structures are addressed.	Chapter 2 (see table 2-8), as well as sections 3.7 (Water Resources) and 3.11 (Land Use) in chapter 3 in the EIS, has been revised based on this comment.
280	57	57.1	ADEQ–Water Quality	LeStarge/Taunt	20-WATER	On behalf of Linda Taunt, Deputy Division Director of the Water Quality Division, Arizona Department of Environmental Quality (ADEQ), ADEQ does not see any impacts related to water quality that have not been addressed already in the Draft Environmental Impact Statement.	Thank you for your comment.
330	68	68.7	Pima County	Bernal/Connolly	20-WATER	Also, as the Federal Emergency Management Agency (FEMA} considers electrical transmission as a critical facility, access to such facilities for maintenance and repair during times of flooding is a very significant issue. As well as the need to protect any substation from a 500-year floor event, as per FEMA guidelines (please see attached comments from Pima County Regional Flood Control Department).	Sections 3.7 and 4.7 of the EIS have been revised to include additional information on FEMA's guidelines for 500-year floodplains.
419	68	68.96	Pima County	Bernal/Connolly	20-WATER	We commented that electrical transmission is considered a critical facility by FEMA and as such accessibility for maintenance and repair during times of flooding is a significant issue which should be evaluated during the NEPA process and that substations should be protected from the 500-year flood event per FEMA guidelines. This issue does not appear to have been explicitly addressed. Adding discussion of Critical Facility designations and requirements to ES.7.16 Public Health and safety is recommended. Protection from 500 year flood should be identified in the substation descriptions and identified in the floodplain section beginning on page 258.	The executive summary and section 3.7 in the EIS has been revised based on this comment.
420	68	68.97	Pima County	Bernal/Connolly	20-WATER	The routes, maintenance access roads and fencing will cross numerous watercourses regulated by Pima County. Although Pima County Regional Flood Control District (PCRFCD) authority with regard to federal floodplains, local floodplains and Regulated Riparian Habitat (RRH) has been acknowledged on page 251 and 252, RRH is notably excluded from DEIS decision space and operational elements. This appears to be in part due to the incomplete understanding of RRH as it relates to the Pima County Conservation Lands System (CLS). While Important Riparian Area (IRA) incudes RRH, not all RRH is IRA under the CLS. While inclusion of IRA in the DEIS is significant, RRH should be identified here as well.	Sections 3.7 and 4.7 in the EIS have been revised based on this comment.
421	68	68.98	Pima County	Bernal/Connolly	20-WATER	The federal definition of wetlands is too narrow for the affected environment and PCRRH should be assessed and mitigated as the best available local information. It is notable that Pima County CLS IRA has been quantified and that RRH mapping is not available across the entire project and therefore cannot be used for route comparison purposes.	Sections 3.7 and 4.7 in the EIS have been revised to include available RRH for the relevant portions of the proposed Project in Pima County, based on this comment.
422	68	68.99	Pima County	Bernal/Connolly	20-WATER	RRH should be added to line 27 on page 252 of section 3.7.4 Issues to be Analyzed.	Section 3.7 in the EIS has been revised for the relevant portions of the proposed Project in Pima County, based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
423	68	68.100	Pima County	Bernal/Connolly	20-WATER	RRH should be called out in the "Framework" management and mitigation plans described in Chapter Two. Specifically RRH should be added to ES7 Affected Environment, Issues and Environmental Impacts and the appropriate mitigation plans including the: Plant and Wildlife Species Conservation Measures Plan; Stream, Wetland, Well, and Spring Protection Plan; and Reclamation, Vegetation, and Monitoring Plans.	Section 2.4.1, as well as sections 3.7 and 4.7 in the EIS, has been revised for the relevant portions of the proposed Project in Pima County, based on this comment.
424	68	68.101	Pima County	Bernal/Connolly	20-WATER	Non-xeric PCRRH should be added to the maps of surface water and wetlands contained in Chapter 3.	Maps found in section 3.7 of the EIS have been revised to include the relevant portions of the proposed Project in Pima County, based on this comment.
425	68	68.102	Pima County	Bernal/Connolly	20-WATER	Although RRH application will be limited to determining local impact and required mitigation it should be acknowledged. To that end we further recommend that RRH and IRA be added to the acronym/glossary list and that footnotes be added wherever the term riparian is used to reduce confusion with the other vegetation inventories used including the National Wetland Inventory and SWReGap.	The acronym and glossary list have been revised in the EIS. When appropriate, RRH has been used instead of "riparian" so that the difference is clear to the reader. No footnotes have been added.
426	68	68.103	Pima County	Bernal/Connolly	20-WATER	Line 17 and 18 on page 69 describe that access roads will be located to avoid "riparian vegetation". A reference to required permitting shall be added to comply with regulating PCRRH.	Section 2.4.2 in chapter 2 of the EIS has been revised to clarify that an Access Road Plan would be prepared, which would comply with appropriate Federal, State, and local agency requirements. These requirements would include regulated PCRRH.
427	68	68.104	Pima County	Bernal/Connolly	20-WATER	Recently maintenance of transmission lines within Pima County has been conducted which unnecessarily destroy RRH which contribute to erosion and local flooding. Mechanical and chemical means have been used to control vegetation growth along power lines to prevent fires from damaging transmission facilities. The NEPA process should include evaluation of alternative maintenance plans which minimize destruction of riparian habitat. This issue is not included in those to be analyzed listed in Section 3.16.3 on page 544 of Chapter 3.	As discussed in section 2.4.1 of the Draft EIS, vegetation management practices along the ROW would be in accordance with NESC ANSI A300 Part 7, "American Operations Integrated Vegetation Management" (BLM's Integrated Vegetation Management Handbook – H 1740-02, March 25, (BLM 2008a)), Western operation and maintenance clearing practices and construction specifications, electric utility ROWs, and International Society of Arboriculture BMPs. The Vegetation Management Plan would be part of the POD as one of the Framework Plans and would be based on NERC Reliability Standard FAC-003-1. Table 2-8 of the Draft EIS also describes design features and mitigation to minimize impacts to riparian vegetation, which is important to the BLM and Western in considering this proposed Project.
428	68	68.105	Pima County	Bernal/Connolly	20-WATER	In order to mitigate impacts to RRH on linear projects the use of Best Management Practices to control erosion and to replace habitat damaged during construction is appropriate. These impacts are site specific and should be considered in tower placement and design, access road routing, and maintenance practices. Still total impacts may best be addressed on a County wide basis by submitting a Conservation Plan. Such plans are an option under PCRFCD Regulated Riparian Habitat Mitigation Standards and Implementation Guidelines which allow large development including utility projects where the special needs of large scale projects are met while supporting the onsite preservation and mitigation of RRH.	Section 2.4.1 and sections 3.7 and 4.7 in the EIS have been revised to clarify how Pima County requirements would be incorporated into the development of Framework Plans and be used to minimize potential impacts from the proposed Project.
429	68	68.106	Pima County	Bernal/Connolly	20-WATER	Per the DEIS the new towers may be of the lattice type. During scoping we commented that consideration should be given to monopoles if placement is within floodways or riparian habitat to minimize the footprint and potential to become clogged with debris during floods. It is not clear if this item has been addressed.	Chapter 2 of the Draft EIS stated that lattice towers and monopoles are being considered for the New Build portion of the Project, while monopoles are proposed for the Upgrade portion of the Project.
430	68	68.107	Pima County	Bernal/Connolly	20-WATER	In conclusion the footprint, placement and accessibility of the lattice towers and access roads will impact the exposure of these facilities to flood damages. Minimization and mitigation of the impacts on flood hazards and riparian habitat will require site specific design and consideration of county wide cumulative effects. Final consideration of these issues will occur during permitting.	The comment accurately reflects the discussion provided in section 2.4.2 of the Draft EIS: "Structure selection and individual structure placement would be determined during the final design phase of the Project."
525	76	76.45	Arizona State Land Department	Ojeda	20-WATER	In POD, Page 8-2, Table 8-1; With regards to the Wetland delineation and permit, please note that the ASLD as land manager must be consulted prior to filing any documentation with the U.S. Army Corps of Engineers.	Comment on the POD noted and shared with Southline Transmission Line, LLC, for incorporation into the final POD. A draft NEPA POD is included as an appendix to this EIS (see appendix N). Additionally, section 3.7 in the EIS has been revised to include a similar statement.
9	5	5.5	Town of Marana	Spencer	2-BIO	Willcox Playa is an ACEC and an Audubon Important Bird Area. Migrating sandhill cranes and other bird species face innumerable threats twice per year during migration. Please do not add another serious peril to bird migration and to the daily movements of the sandhill cranes.	The potential impact of the proposed transmission line on wildlife, along with a description of mitigation measures and other measures proposed to reduce potential impacts, was analyzed in section 4.8.2 of the Draft EIS. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives for their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included in the Agency Preferred Alternative.
41	15	16	BIA		2-BIO	Page 270, line 12: The Nation has a Tribally Sensitive Species list which should have been referenced or discussed, even if the Nation d id not want to share it. Appendix D, Table D-1 should have made reference to the list (if shared).	BLM and Western coordinated with the Tohono O'odham Nation to ensure that tribally sensitive species for the tribe were considered in the EIS. Sections 3.8 and 4.8 (Biological Resources) and appendix D have been revised in the EIS to indicate that the species of tribal concern for the Nation were considered in the analysis; however, based on coordination with the Nation, the actual list and analyses of species are not included in the document.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
42	15	15.10	BIA		2-BIO	Page 271: The Nation has a sensitive species list. The Nation should have received equal treatment in this section.	Sections 3.8 and 4.8 (Biological Resources) and appendix D have been revised in the EIS to indicate that the species of tribal concern for the Tohono O'odham Nation were considered in the analysis. Based on coordination with the Nation, the actual list and analyses of species are not included in the document.
43	15	15	BIA		2-BIO	Page 323: The Nation's sensitive species list should have been mentioned/incorporated in this section.	Sections 3.8 and 4.8 (Biological Resources) and appendix D have been revised in the EIS to indicate that the species of tribal concern for the Tohono O'odham Nation were considered in the analysis. Based on coordination with the Nation, the actual list and analyses of species are not included in the document.
44	15	15.12	BIA		2-BIO	Page 692, line 404: Impacts to sensitive species on the Nation should have been addressed. If the Nation did not or would not provide a list, that fact should have been stated so in Chapter 3. As written, it appears the document ignored or left out the Nation's sensitive species. Whether the omission was because of lack of cooperation by the Nation or an oversight by the document preparers is not clear.	Sections 3.8 and 4.8 (Biological Resources) and appendix D have been revised in the EIS to indicate that the species of tribal concern for the Tohono O'odham Nation were considered in the analysis. Based on coordination with the Nation, the actual list and analyses of species are not included in the document.
45	15	15.13	BIA		2-BIO	Page 722: Pima pineapple is known to be present on the San Xavier Reservation. Surveys will need to be conducted.	Western completed surveys for the Pima pineapple cactus across the San Xavier Reservation in the summer of 2014. Table 2-8, which includes project design features and mitigation, in chapter 2 of the EIS has been revised to indicate that additional species specific surveys for the Pima pineapple cactus on the San Xavier Reservation would be conducted, if needed.
50	16	16.3		Kestler	2-BIO	I am concnered about the impact on wildlife in the Wilcox Playa area - particulary on the birds. It is very important that there be minimal harm to wildlife. My experience with birds tells me that this is particularly important because of the increase in the power to be carried.	The potential effects of the proposed transmission line on wildlife, including migratory birds, along with a description of mitigation measure and other measures proposed to reduce potential impacts, were described in section 4.8.2 of the Draft EIS. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations at Willcox Playa (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives for their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as part of the Agency Preferred Alternative.
141	26	26.4		Hatch	2-BIO	I will be including my (previously submitted) list of 138 endangered flora & fauna in the local area East of Interstate 10, along with a link to an album of photos and videos I've personally taken near our residence at 3983 North Sheppard Road, Willcox, AZ – including many of the endangered species on that list – which you can download at your convenience and feel free to share with whomever or whatever entity. I will follow up by printing and sending this message and a flash drive with all of the above mentioned photos and videos	Thank you for sharing your research regarding special status species near the Willcox Playa and surrounding area. Impacts to biological resources, including vegetation, wildlife, and special status species, were considered in sections 3.8 and 4.8 (Biological Resources) of the Draft EIS.
164	32	32.10	EPA	Jansky/Weeks	2-BIO	Chapter 5; page 1130. The DEIS states there will be adverse effects to threatened and endangered species and migratory birds. According to the DEIS, BLM has consulted the U.S. Fish and Wildlife Service (FWS) to gather information on species occurrence, potential effects of the action on species, and species specific mitigation measures. At this time consultation is ongoing. Section 5.6 is titled "Formal Consultation", and Section 7 of the Endangered Species Act (ESA) is a sub-heading of this section. If formal consultation on Section 7 of the ESA was entered into between BLM and FWS, it is not apparent. Formal Section 7 consultation has strict time frames that must be adhered too, whereas, informal consultation does not. There is no correspondence between BLM and FWS to determine when formal consultation was initiated. There is not a biological assessment from BLM or a biological opinion from FWS to determine the effects of the project on special status species. Recommendation: The FEIS should include correspondence between BLM and FWS to determine if formal or informal consultation is occurring. Include the biological assessment from BLM if one was prepared. The FEIS should also contain a biological opinion from FWS	Section 5.5.2 (formerly section 5.6) of the EIS has been revised to include information on formal consultation with the FWS. Additionally, the BO and amendment have been included as an appendix (see appendix M in the EIS).
219	41	41.4	Hearing	No ID Speaker	2-BIO	I had a question about the potential wildlife considerations on this. Were there any factors in the design to try to minimize impacts from wildlife collisions with the Sandhill cranes you see on the playa a lot, golden eagles, things of that nature?	The potential impacts of the proposed transmission line on wildlife, along with a description of mitigation measures and other measures proposed to reduce potential impacts, was described in section 4.8 of the Draft EIS. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8. Chapter 2, as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional mitigation measures for wildlife. Therefore, P7 remains part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
234	44	44.1	Quantitative Programming Corporation	Santinello	2-BIO	As currently conceived, Southline could negatively impact an Important Bird Area, the Willcox Playa, as well as the San Pedro River Valley, Cienega Creek and Tumamoc Hill, and should be adjusted and constructed accordingly. I wanted to let the Bureau of Land Management know it would be much better for the future wellbeing of this area if these special habitats were avoided and protected to the greatest extent possible.	The potential environmental impacts of the proposed Project and alternatives on resources like Willcox Playa, the San Pedro River valley, Cienega Creek, and Tumamoc Hill were analyzed in chapter 4 of the Draft EIS. As noted in the Draft EIS, BLM and Western developed local alternatives around Tumamoc Hill, with various stakeholders, to minimize impacts to Tumamoc Hill. As discussed in section 3.8 of the Draft EIS, the existing Western line and ROW cross the San Pedro River and Cienega Creek; therefore, upgrading the transmission line in place, as proposed by this project, would minimize potential impacts to these sensitive special habitats. Additionally, the Agency Preferred Alternative in the EIS includes an alternative that would move the existing line away from crossing Tumamoc Hill proper. Even though the line would still be on Tumamoc Hill property, this move minimizes impacts to Tumamoc Hill (see chapter 2).
235.1	45	45.1		Foley	2-BIO	As currently conceived in its Draft EIS, the Southline project would be routed adjacent to an Important Bird Area, the Willcox Playa, and through or adjacent to important bird habitats such as the San Pedro River Valley, Cienega Creek and Tumamoc Hill	The potential environmental impacts of the proposed Project and alternatives on resources like Willcox Playa, the San Pedro River valley, Cienega Creek, and Tumamoc Hill were analyzed in chapter 4 of the Draft EIS. As discussed in section 3.8 of the Draft EIS, the existing Western line and ROW cross the San Pedro River and Cienega Creek; therefore, upgrading the transmission line in place, as proposed by this project, would minimize potential impacts to these sensitive special habitats. Additionally, the Agency Preferred Alternative in the EIS includes an alternative that would remove the existing line away from crossing Tumamoc Hill proper. Even though the line would still be on Tumamoc Hill property, this move minimizes impacts to Tumamoc Hill resources (see chapter 2). Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative.
236	45	45.2		Foley	2-BIO	Wherever possible, riparian, scrub mesquite, and upland Sonoran Desert vegetation shoul be preserved in place rather than allowing mass grading, especially with regard to sensitive areas such as those described above.	As discussed in chapter 2 of the Draft EIS, grading would only be conducted where necessary.
240	46	46.3		Hamel	2-BIO	The wildlife here and negative effects on them have me concerned. We have coatimundi, Harris hawks, Mexican Freetailed bat, AZ Big Brown bat, Gila monsters, 4 types of Orioles, multiple types of hummingbirds, Sand Hill Cranes, Herons, Bear, Deer, Bobcat, javelina, road runner, Blue Bgrosbeak, desert tortoise, Flycatchers – this is a beautiful unspoiled area and we don't want it ruined.	The potential impacts to biological resources, including wildlife, were considered in sections 3.8 and 4.8 (Biological Resources) of the Draft EIS.
266	49	49.17	Cascabel Working Group	Meader	2-BIO	San Pedro River Crossing. While the routing of the project will minimize impacts to the San Pedro River and its riparian area, the Environmental Impact Statement should stipulate that construction of the project will be done without the clear-cutting and removal of riparian vegetation. The riparian vegetation at the river crossing is remnant mesquite woodland and scrubland and is short enough to leave in place, as is the practice with the existing line. This should also be done with the crossing of Cienega Creek and Davidson Canyon.	Project design features and mitigation measures in table 2-7 in the Draft EIS (now table 2-8 in the Final EIS) indicated that removal of riparian scrubland would be avoided, where possible. This would apply to the San Pedro River, Cienega Creek, and Davidson Canyon crossings.
287	60	60.2		Wood	2-BIO	Destruction of property/vegetation (mine) during construction,	The potential impact of the proposed transmission line on property in terms of land use was described in section 4.11.1, property value in section 4.15, and vegetation in section 4.8 of the Draft EIS.
294	62	62.1	Town of Marana	Spencer/Grossman	2-BIO	The transmission line appears to pass less than half a mile from the Ina Road Bridge, which is a roost for approximately 30,000 bats; Mexican free-tailed bats (Tadarida brasiliensis) and cave myotis (Myotis velifer). Although these bats are not listed as threatened or endangered, a roost of this size is significant and acts as a maternity colony during April/May. If there are methods appropriate to transmission lines and towers that will aid in deterring bats, please implement such measures.	Thank you for your comment and the information provided. BLM and Western worked with the FWS and AGFD regarding potential impacts to bats. Potential impacts to bats at the Ina Road bridge, along with mitigation, have been added to table 2-8 and in section 4.8 in the EIS.
295	62	62.2	Town of Marana	Spencer/Grossman	2-BIO	The farm fields of Marana and the surrounding area are home to several burrowing owl burrows. The areas around concrete-lined ditches are often inhabited by the owls and should be surveyed by a qualified biologist (as stated in the EIS) just prior to construction. Please coordinate with AZ Game and Fish Department and Bob Fox, Wild at Heart: bob@wildatheartowls.org; phone: 480-595-5047 if owls are located within the area proposed for disturbance.	Project design features in the Draft EIS indicate the types of considerations for burrowing owls (see table 2-7 in the Draft EIS, now table 2-8 in the Final EIS). Preconstruction surveys would be conducted to determine the presence of burrowing owls in areas of suitable habitat, including farm fields. If the species is present, mitigation measures outlined in section 4.8 and table 2.8 of the EIS would be implemented.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
296	62	62.3	Town of Marana	Spencer/Grossman	2-BIO	Please consider aligning the Southline along an existing transmission line or the Sunzia line on the same right-of-way as much as possible to reduce the effects to migratory birds and other species. The EIS states that combining the two lines to the extent possible would increase levels of disturbance to natural resources, but no real explanation is provided for this statement.	As described in chapter 2 of the Draft EIS, local agency alternatives were developed to consider routing the Southline and SunZia transmission line projects where appropriate (see local alternatives DN1 and LD4). It should be noted that in Avra Valley, within the Town of Marana, the proposed Project is a rebuild of an existing line and is not close to the not yet constructed SunZia alignment, which is located east and north of the Tortolita Substation. Collocation of the proposed line with other transmission lines would decrease the overall level of impacts by limiting the impacts to a smaller overall area; however, localized impacts at the site of the collocated lines would be greater due to larger blocks of disturbance. The benefits of collocation with the SunZia transmission line are dependent upon that project being constructed. Section 4.21 of the EIS has been revised to include additional information on the cumulative effects of two transmission lines.
297	62	62.4	Town of Marana	Spencer/Grossman	2-BIO	Large numbers of winter migrant hawks inhabit the farm field and riverine land in the Marana area, including crested caracara (Caracara cheriway), peregrine falcons (Falco peregrinus), prairie falcons (Falco mexicanus), great-horned owls (Bubo virginianus), and many other bird species, including mountain plovers (Charadrius montanus). It is difficult to determine how these species (and the sandhill cranes and other large birds in other locations along the R-O-W) will be affected when no details are provided for the mitigation other than saying that an “Avian Protection Plan” will be developed. More detail should be incorporated into this EIS.	The Avian Protection Plan will adhere to APLIC guidelines for reducing collisions, including co-locating lines. Additional information has been added to section 2.4.1 of the EIS that clarifies how the Avian Protection Plan content would be developed and examples of measures that ***could*** be used. Sections 3.8 and 4.8 of the EIS have been revised to address the additional guidance.
298	62	62.5	Town of Marana	Spencer/Grossman	2-BIO	The current preferred alternative slices through approximately 2 miles of riparian habitat on the Santa Cruz River, just west of the Pinal Airpark in Pinal County. It would be preferable to cross the river at a right angle rather than running through the riparian area for such a great distance, to avoid effects on migrating birds that follow the waterway during spring and fall.	The proposed alignment follows the existing line through an area that has minimal riparian vegetation and has been disturbed since the existing line was installed; a new alignment would increase new disturbance.
299	62	62.6	Town of Marana	Spencer/Grossman	2-BIO	Buffelgrass, Johnson grass, giant arundo, and Sahara mustard are two of the invasive species that occur in the area. Please include a plan to avoid introducing or spreading invasive species.	The BLM and Western are aware of the potential for the proposed Project to result in conditions favorable to the expansion of invasive species. Mitigation commitments for invasive species were included in table 2-7 in the Draft EIS (now table 2-8 in the Final EIS).

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
309	66	66.1	Volunteer Ecologists	Reichenbacher	2-BIO	A little over a century ago scientists at the Carnegie Desert Laboratory on Tumamoc Hill discovered a delicate vine clambering over shrubs and cacti. This would become Tumamoca macdougalii (Tumamoc globeberry) a new genus and a new species known only from Tumamoc Hill (known to botanists as the "type locality"). History did not record the exact location from which the first specimens were collected , but it is highly likely to have been within two hundred yards of what, under the current preferred alternative, would be an upgraded comer 230 kV tower site. This tower site is 11 yards from a known Tumamoc globeberry plant that we have been monitoring since 2007. The i mage above (taken 20 Aug. 201 1) shows the plant (indicated by pink flagging tape). The three wooden towers carryi ng the current 1 15 kV lines to be replaced are directly behind. Fig. B-68 (DEIS Vol. 4, p. K68) shows the current environment of the north side of Tumamoc Hill and the same image with a simulated replacement tower. Since the footprint of the new tower would be similar or somewhat larger than that of the existing poles, our concern is with impacts caused by construction activities. For a long time Tumamoc globeberry was known only from Tumamoc Hill. Then it sporadically turned up elsewhere in southern Arizona and Sonora, Mexico. It was listed as a federal endangered species in 1986, but then more surveys showed it was widespread, though never common, through the remote deserts of western Sonora. The circumstances of listing and delisting are too complex to go into here, but they have to do with the Central Arizona Project (CAP). One of us (F. Reichenbacher) participated in the listing and delisting process as a U.S. Bureau of Reclamation consultant. These discussions noted various likely future impacts to Tumamoc globeberry including locations where we all believed that it would be possible to focus on conservation and not impact avoidance and mitigation. Tumamoc Hill was one of these locations. In 2007 our group of volunteer ecologists revisited select populations of Tumamoc globeberry in the Tucson and Avra Valley area. We are sorry to report that many of the populations have experienced steep population declines; affecting several populations we had hoped were well protected. In 2013 we found nine Tumamoc globeberry plants on Tumamoc Hill, all that remains of a population that included 50 to 100 individual plants in the 1980's and 1990's. All are within 150 yards of the tower site pictured above. The justification for removing Tumamoc globeberry from the endangered species list focused on the large populations in Mexico. Although delisting monitoring was done as required by law, no one to our knowledge has revisited any of the populations in Mexico since 1995. The population declines we have documented in the Tucson area occurred between 1995 and 2007. Our monitoring surveys have documented several Tumamoc globeberry populations in danger of local extinction, including the type location of the genus and species on Tumamoc Hill. The cause seems to be related to habitat changes caused by the Tucson urban heat island compounded by the effects of global warming. In the early 1990's no one was thinking about this; certainly not in connection with a curious vine in the Sonoran Desert. IfTumamoc globeberry populations continue to decline, it would then seem necessary for the federal government to consider relisting.	Thank you for the extensive information on the Tumamoc globeberry. Chapter 2 (see table 2-8 of the EIS), as well as sections 3.8.1 and 4.8.1 of the EIS, has been revised to include additional considerations for Tumamoc globeberry. The Agency Preferred Alternative was identified in part to avoid impacts on Tumamoc Hill by moving the preferred alignment to the west of Tumamoc Hill on segment TH1a (see section 2.7 of the EIS), which would run along Starr Pass Boulevard and Greasewood Road, rather than crossing Tumamoc Hill in the existing Western ROW. As noted in table 2-8 in the Final EIS, preconstruction coordination with Pima County, the University of Arizona, and other appropriate groups would be conducted to minimize impacts to Tumamoc globeberry monitoring plots and plants on Tumamoc Hill.
316	67	67.5	Arizona Game and Fish Department	Ritter/Francis	2-BIO	The DEIS states that a reduction in the range of occurrence of any sensitive species would be a significant impact, and that individual projects are required to implement measures to mitigate impacts to special status species. Two species the DEIS does not mention under the Department's Species of Greatest Conservation Need section are the American pronghorn and the ornate box turtle. Due to the loss of habitat within their range, American pronghorn and ornate box turtle have each been elevated one tier in the Arizona State Wildlife Action Plan: 2012-2022. Pronghorn are now a tier lb species, and the ornate box turtle is a tier la species. Pronghorn are found adjacent to the New Mexico border in the Playa de los Pinos along the APA route and in the valley near the Circle I Hills. Box turtles are found in Sulphur Springs Valley and San Simon Valley. The Department recommends incorporating these species into your evaluations.	Sections 3.8 and 4.8 of the EIS have been revised based on this comment.
331	68	68.8	Pima County	Bernal/Connolly	2-BIO	Other concerns noted in further detail in the attachments herein include: • the notable omission of Regulated Riparian Habitat (RRH) from the DEIS decision space and operational elements; • conservation of sensitive vegetative resources, including riparian areas, Pima pineapple cacti, saguaro and ironwood; • control and eradication of invasive species;	Sections 3.8 and 4.8 of the EIS have been revised based on this comment.
333	68	68.10	Pima County	Bernal/Connolly	2-BIO	• potential compromise to regionally important biological corridors;	Potential impacts to biological resources, including regionally important biological corridors, were considered in sections 3.8 and 4.8 (Biological Resources) of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
353	68	68.30	Pima County	Bernal/Connolly	2-BIO	We call your attention to an important monitoring plot for the Tumamoc globeberry that is located along the current power line alignment at Tumamoc Hill. While this rare plant is no longer federally protected, the plants in monitoring plot and the data associated with the monitoring site are very important to our understanding of trends in the species. Impacts to this monitoring site from construction and maintenance can and should be completely avoided. While the alternative routes may affect other Tumamoc globeberry populations, these other populations are not associated with a wealth of long-term data on the status of the species.	Chapter 2 (see table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional considerations for Tumamoc globeberry. The Agency Preferred Alternative was selected in part to avoid impacts on Tumamoc Hill by moving the preferred alignment to the west of Tumamoc Hill on segment TH1a (see section 2.7), which would run along Starr Pass Boulevard and Greasewood Road, rather than crossing Tumamoc Hill in the existing Western ROW. As noted in table 2-8 in the Final EIS, preconstruction coordination with Pima County, the University of Arizona, and other appropriate groups would be conducted to minimize impacts to Tumamoc globeberry monitoring plots and plants on Tumamoc Hill.
355	68	68.32	Pima County	Bernal/Connolly	2-BIO	Additionally, the rebuild crosses through or is adjacent to several County-owned preserves, including Cienega Creek Natural Preserve, Bar V Ranch, Tucson Mountain Park, and Tumamoc Hill and mitigation or compensation for impacts is not proposed. These lands are of particularly high value to County residents for their cultural and natural resources values; the County also intends to rely on most of these areas as mitigation lands for our forthcoming Section 10 Incidental Take Permit from the U.S. Fish and Wildlife Service. We recommend that Southline mitigate unavoidable natural resource impacts by protecting lands elsewhere in the Conservation Lands System.	Chapter 2 (see table 2-8), as well as section 4.8.1 of the EIS, has been revised to include additional consideration for Pima County Conservation Lands. Disturbance within Pima County Conservation Lands would primarily occur within the Western ROW for the existing line. As described in section 2.4.1 of the Draft EIS, a Reclamation, Vegetation, and Monitoring Plan would be developed, areas of temporary disturbance would be restored, and the success of that restoration would be monitored. If during final Project design it is determined that impacts that could not be mitigated through restoration would occur outside of the existing ROW within Conservation Lands, then compensatory mitigation would be considered. Please note that lands within the existing ROW for Western's 115-kV lines would not be appropriate for mitigation lands for Pima County's section 10 permit.
437	69	69.1	Nature Conservancy	Marshall	2-BIO	The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends. We recognize that new transmission lines are an integral part of the shift to renewable energy supplies in the Southwest. Our comments are focused on helping develop a balanced decision that responds to the need for energy while minimizing impacts to wildlife and other important natural resources.	Thank you for your comment.
440	69	69.4	Nature Conservancy	Marshall	2-BIO	The DEIS discloses substantial impacts to cranes from the preferred alternative, but it does not consider the importance of the Playa to cranes from the perspective of cumulative effects. Historically, the Playa was one of several areas frequented by wintering cranes. But with the loss of habitat at the delta of the Colorado River, the Playa is now the primary wintering area in Arizona. Whereas BLM has identified alternatives to the north that would avoid impacts, the cranes do not have alternative locations in the region that provide the feeding, loafing, and roosting habitats found at Willcox Playa and areas to the East and South. Selecting an alternative that minimizes the disclosed impacts as well as further cumulative impacts to Sandhill Cranes and other water-dependent species would minimize diminishment of the environmental baseline and increase the likelihood that the Willcox Playa and Sulphur Springs Valley remain viable habitat. We encourage BLM to select an alternative for Route Group 2 that does not bisect travel routes between Willcox Playa and feeding, roosting, and loafing areas to the East and South.	The potential impacts of the proposed transmission line on wildlife, along with a description of mitigation measures and other measures proposed to reduce potential impacts, were analyzed in section 3.8 of the Draft EIS. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative. Section 4.21.4 of the EIS has been revised to clarify the potential cumulative effects on sandhill cranes.
443	70	70.1		Engoron-March	2-BIO	Special habitats must be avoided and protected to the greatest extent possible while developing the southern transmission.	Potential impacts to biological resources were considered in sections 3.8 and 4.8 (Biological Resources) of the Draft EIS. It is the policy and goals of both lead agencies, the BLM and Western, to avoid sensitive areas to the extent practicable. Project design features outlined in table 2-7 of the Draft EIS (now table 2-8 in the EIS) were developed to assist in routing and Project design to avoid special habitats whenever practicable.
444	71	71.1	U.S. Fish and Wildlife Service	Nicholopoulos	2-BIO	Table 3.8-7. Federal Endangered Species Act Species by Route Group, Chapter 3, page 316. Cactus Ferruginous Pygmy-Owl is listed as Endangered in this section; however, the species was de-listed because it was found to be not warranted, "Additionally, using the currently accepted taxonomic classification of the pygmy-owl (Glaucidium brasilianum cactorum), we find that listing the pygmy-owl is not warranted at this time throughout all or a significant portion of its range, including the petitioned and other potential DPS configurations" (Federal Register, Vol 76, No. 193, p. 61856, October 5, 2011).	Sections 3.8 and 4.8 of the EIS have been revised to include additional clarification for species delisted under the ESA.
445	71	71.2	U.S. Fish and Wildlife Service	Nicholopoulos	2-BIO	Comment 2. Table 3.8-10 New Mexico Wildlife Conservation Act Species by Route Group, Chapter 3, Page 321. The Bendire's Thrasher is one the Service's highest-priority non-ESA-listed bird conservation targets and is listed on the Service's list of Birds of Conservation concern. Bendire's Thrasher has also recently become of high interest to the New Mexico Department of Game and Fish, but their list of Species of Greatest Conservation Need has not yet been updated. This species is found in the Southline Transmission Line project area; potential impacts to that species and its habitats should be addressed in the document.	Sections 3.8 and 4.8 of the EIS have been revised to include information on the Bendire's thrasher.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
446	71	71.3	U.S. Fish and Wildlife Service	Nicholopoulos	2-BIO	Rare Plants. Consideration for the rare plant, Tumamoc globeberry (Tumamoca macdougalii), should be given during this project. Although no longer listed as an endangered species under the ESA, the plant is quite rare, appears to be declining, and is listed as sensitive by both the BLM and U.S. Forest Service. The species is also protected under the Arizona Native Plant Law as a salvage-restricted plant. In the past decade, the numbers of individuals in monitored populations have declined. For example, there were I 78 plants recorded at Tumamoc Hill in I985; in 2013, only 9 individuals remained. The preferred alternative would involve placing tower sites within this population already known to be in decline and in danger of local extinction. The preferred alternative would have one tower being placed approximately ten meters from a monitored plant.	Chapter 2 (see table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional considerations for Tumamoc globeberry. The Agency Preferred Alternative was identified in part to avoid impacts on Tumamoc Hill and the long-term monitoring plots by moving the preferred alignment to the west of Tumamoc Hill on segment TH1a (see section 2.7), which would run along Starr Pass Boulevard and Greasewood Road rather than crossing Tumamoc Hill in the existing Western ROW. BLM and Western will work with the species' experts to develop the surveys for this plant, and utilize previously collected location data. If the species is found within the ROW during preconstruction surveys, individual plants would be avoided.
447	71	71.4	U.S. Fish and Wildlife Service	Nicholopoulos	2-BIO	Therefore, we recommend an alternative route be taken away from Tumamoc Hill (e.g. THI A, THI B, or THI C), though other routes may also go through appropriate Tumamoc globeberry habitat. We also recommend surveys be conducted for the plant in suitable habitat to ensure the protection of these plants. Should it not be possible to avoid the Tumamoc Hill alternative, ensure great care be taken during pole placement to avoid plants at this location. We are in touch with a group of volunteer scientists who monitor the population yearly during fruiting when plants are most easily located. This group plan to survey and monitor throughout the Tumamoc Hill corridor in August of 20 I4. We would be happy to assist you in contacting them. It is important to preserve existing populations of this species to prevent further decline and avoid the need to re-list this species under the ESA to ensure adequate protection for the conservation of this species.	Thank you for the offer of assistance. If the species is found within the ROW during preconstruction surveys, individual plants would be avoided. The Agency Preferred Alternative was identified, in part to avoid impacts on Tumamoc Hill and the long-term monitoring plots by moving the preferred alignment to the west of Tumamoc Hill on segment TH1a (see section 2.7), which would run along Starr Pass Boulevard and Greasewood Road, rather than crossing Tumamoc Hill in the existing Western ROW. Further, the BLM and Western would work with the species' experts to determine locations of known plants and to craft effective surveys, and the Project would avoid all known locations to protect the rare plant.
448	71	71.5	U.S. Fish and Wildlife Service	Nicholopoulos	2-BIO	Sandhill Crane. As previously stated in out June 4, 20 I2, scoping comments, we are concerned about the effects to sandhill cranes from locating the powerline along the east edge of the Willcox Playa. The Draft EIS states there will be collisions and likely mortality, and we agree. Therefore, we recommend an alternative route be located farther east of the Willcox Playa. While collisions may not be eliminated, we believe they would occur less often than the proposed location. We are currently coordinating with the BLM, WAPA, and Arizona Game and Fish Department in exploring alternative locations. If alternative locations to the east are feasible, we offer our assistance in determining specific locations and coordinating with the applicant.	The potential impacts of the proposed transmission line on wildlife, along with a description of mitigation measures and other measures proposed to reduce potential impacts, were analyzed in section 4.8 of the Draft EIS. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative.
535	78	78.8	Coalition For Sonoran Desert Protection	Campbell	2-BIO	In the arid Sonoran Desert, "direct ground disturbance" can cause irreparable harm to Sonoran Desert flora and fauna. It can take decades for vegetation to re-establish itself if active restoration isn't completed. An increase in "ambient noise levels" can also negatively impact local wildlife and their ability to forage, rest, and mate in their habitat, especially for smaller wildlife species with small home ranges. Increased access and use of CLS lands through new access roads and by OHV and other users can have a variety of negative impacts to these lands.	The potential impact of the proposed transmission line on vegetation and wildlife was addressed in sections 3.8 and 4.8 of the Draft EIS. Additionally, the potential impacts to land use and in terms of changing access were addressed in sections 3.7 and 4.7 of the Draft EIS.
536	78	78.9	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Pima County guidelines clearly state that all impacts to CLS lands should be mitigated. This includes mitigating for impacts to Important Riparian Areas, Biological Core Management Areas, Special Species Management Areas, and Multiple Use Management Areas at a prescribed ratio consistent with their biological importance. The DEIS should be revised to include adequate mitigation for all impacts to Pima County's CLS lands. The DEIS directly quotes the mitigation policies for the CLS, as outlined in Pima County's Comprehensive Land Use Plan. These mitigation policies should be adhered to in full for the Southline Transmission Line Project to satisfactorily mitigate for all impacts to the CLS.	Chapter 2 (see table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional clarification for mitigation for Pima County Conservation Lands. However, the area to be crossed is in an existing ROW for an existing Western line and the additional impacts from the upgrade of the existing transmission line would occur within that ROW and disturbance area. Little disturbance outside the ROW would be expected to occur in CLS areas. Any additional ROW, if acquired, would be for protective clearance from development at the edge of the ROW and to ensure safe clearance for conductors. If during Project design it is determined that Project facilities would have impacts outside of the existing ROW, compensation for those additional impacts would be considered.
537	78	78.10	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Analysis of Impacts to Arizona's Wildlife Linkages Habitat fragmentation and loss are currently recognized as the principal threats to biological diversity. Any actions that result in fragmentation would have a significant impact on biological resources. While the BLM acknowledges these facts by incorporating statements into the DEIS, it does not adequately assess potential impacts caused by habitat fragmentation or impacts to wildlife linkages and movements as a result of this project. The Southline Transmission Line Project has the potential to significantly impact the movement of some wildlife species. We appreciate that the BLM included information about designated wildlife linkages within the vicinity of the analysis area. However, further analysis of potential impacts to these areas and to the various species that may utilize them is necessary. Also, as noted on p. 311 of the DEIS, other natural topographical features have been identified as animal movement corridors, although not all of these have been analyzed and modeled in linkage assessments. In order to better evaluate potential effects from this project, the BLM should also address possible impacts to these non-designated corridors and how these could affect wildlife movement.	Potential impacts to wildlife corridors were addressed in section 4.8 of the Draft EIS. As described in section 4.8 of the Draft EIS, impacts would be minimized through: spanning ephemeral drainages and riparian areas; revegetating temporary disturbance areas; and monitoring and rectifying erosion and invasive species issues if they arise.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
538	78	78.11	Coalition For Sonoran Desert Protection	Campbell	2-BIO	As shown in Table 3.8-6, nine movement corridors occur within the analysis area, which are used by a variety of focal species. These areas may also be important for a number of other non-focal species that are not shown in the table. In its assessment of potential impacts to these corridors, however, the BLM only provides very general information, including the expected acreage to be affected within each linkage and the broad statement that impacts "would include habitat loss, degradation, and fragmentation as well as increased OHV access due to the presence of access roads" as well as "potential barriers to movement along the corridor" (p. 746). Such a broad summary does not provide adequate information on how species' movements could be affected by this project. Further information and analysis is needed on how each area will be affected and on how the various species that use these corridors could be impacted.	Sections 3.8 and 4.8 have been revised based on this comment. As described in section 4.8 of the Draft EIS, impacts would be minimized through: spanning ephemeral drainages and riparian areas; revegetating temporary disturbance areas; and monitoring and rectifying erosion and invasive species issues if they arise.
539	78	78.12	Coalition For Sonoran Desert Protection	Campbell	2-BIO	In the DEIS, the BLM repeatedly states that impacts for each of the routes and alternatives would be as described for the potential cougar corridor in route group 1 (as shown on p. 746). This is misleading and could seriously downplay potential impacts to some species, especially considering that the various species that use these corridors would be affected differently within each area.1 For example, as noted in the DEIS, wide-ranging and generalist species, such as mountain lions, may experience minimal movement restriction within the corridors as a result of this project. However, the BLM does not address the fact that species with very specific habitat requirements, limited movement ability, inability/unwillingness to cross open or disturbed spaces, etc., may experience significant movement restrictions. Depending on what parts of the corridors are affected – and to what degree the habitat is changed – the modified areas may no longer serve as functional corridors for some species. The BLM needs to further analyze potential impacts on corridor usage by a diversity of species as a result of this project. Footnote: 1 Andrén, H. 1994. Effects of habitat fragmentation on birds and mammals in landscapes with different proportions of suitable habitat: a review. Oikos 71:355–366.	Thank you for providing this information and these references. Sections 3.8 and 4.8 of the EIS have been revised based on this comment. As described in section 4.8 of the Draft EIS, construction, operation and maintenance of the proposed transmission line and the associated access roads would create temporary impacts associated with the presence of workers and equipment that may cause species to avoid using work areas during construction activities.
540	78	78.13	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Similarly, the BLM must more thoroughly assess cumulative impacts to wildlife species as a result of changes to movement corridors. As climate change, drought, human development, and other factors alter habitat availability, quality, and range, the ability for species to move is becoming increasingly important. As the DEIS indicates, numerous past, present, and reasonably foreseeable actions could affect both available habitat and movement ability. Cumulatively, these projects will result in major, adverse, long-term impacts that will continue to fragment habitat and create barriers to species movement, access to resources, and genetic interchange (p. 1092–1093). Movement corridors may cease to be functional for some species, resulting in population-level – perhaps even species-level – impacts. This is a significant impact that must be more thoroughly analyzed.	Section 4.21.4 of the EIS, which discusses the potential cumulative impacts to biological resources, has been revised based on this comment.
541	78	78.14	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Lastly, in the interest of using the best available science, we encourage the BLM to review and incorporate information from the Pima County Wildlife Connectivity Assessment, funded by Pima County's Regional Transportation Authority and completed by the Arizona Game and Fish Department in 20122. This assessment resulted from a multi-year process involving a large group of community stakeholders and scientists and provides a more detailed analysis of wildlife linkages in Pima County, including areas where the Southline Transmission Line Project will have impacts. Footnote: 2 The Pima County Wildlife Connectivity Assessment can be found at: http://www.azgfd.gov/w_c/conn_Pima.shtml	Thank you for your comment. Sections 3.8 and 4.8 of the Draft EIS used information from the Pima County Wildlife Connectivity Assessment (see AGFD (2012b) in chapter 6).
542	78	78.15	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Mitigation for Impacts to Arizona's Wildlife Linkages The proposed Southline Transmission Project has numerous potential impacts to Pima County's and southern Arizona's wildlife linkages. The protection of wildlife linkages is a core focus of the Sonoran Desert Conservation Plan and the Coalition for Sonoran Desert Protection. Significant local resources, including millions of dollars of open space purchases and infrastructure investments, have been spent on protecting Sonoran Desert wildlife linkages in recent years. The DEIS falls short in not requiring any significant mitigation for these impacts.	Proposed Project design features in the Draft EIS for the rebuild of the existing line with existing access roads include measures to limit weed introduction and spread, minimize impacts to washes, riparian corridors, and other species' movement areas, limit spans to approximately 1,200 feet, reclaim disturbed areas, avoid removal of riparian vegetation except when needed to maintain safety standards for line clearance, and exclude roads from riparian areas. These features were described in table 2-7 (now table 2-8 in the Final EIS) and section 4.8-2 of the Draft EIS.
543	78	78.16	Coalition For Sonoran Desert Protection	Campbell	2-BIO	Generally speaking, a new or upgraded transmission line, new or improved access roads, and increased vehicle traffic and associated maintenance activities will fragment wildlife habitat and potentially sever wildlife linkages and migration corridors. New access roads associated with the transmission line could facilitate the introduction and spread of invasive species as well as unauthorized motorized activity and associated disturbances that could impair the functionality of wildlife linkages.	The potential risk of invasive species and mitigation for these species were covered in sections 3.8 and 4.8 of the Draft EIS. However, sections 3.8 and 3.8 of the EIS have been revised to clarify the types of potential impacts that would result from upgrading or building a new transmission line. Proposed project design features in the Draft EIS include measures to limit weed introduction and spread, minimize impacts to washes, riparian corridors, and other species' movement areas, limit spans to approximately 1,200 feet, reclaim disturbed areas, avoid removal of riparian vegetation except when needed to maintain safety standards for line clearance, and exclude roads from riparian areas. These features were described in table 2-7 (now table 2-8 in the Final EIS) and section 4.8-2 of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
544	78	78.17	Coalition For Sonoran Desert Protection	Campbell	2-BIO	In the list of "Additional Mitigation Measures" on p. 809-810 of the DEIS, there are no mitigation measures that address restoration of ground disturbances. Most of the mitigation measures describe measures for pre-construction and construction activities, but almost none of them address the post-construction timeframe. We recommend the inclusion of additional mitigation measures that require active restoration of ground-clearance/disturbance activities with a plant palette reflective of the local ecosystem.	All Project design features and mitigation measures are now outlined in chapter 2 of the EIS (see section 2.4.6 and table 2-8). The Draft EIS included this information previously in table 2-7. Additional text has been added to section 2.4.3 (see "Reclamation Plan") and to section 4.8 in the EIS regarding operational mitigation measures and to indicate that plant palettes for the revegetation efforts would be specific to the local ecosystem.
547	78	78.20	Coalition For Sonoran Desert Protection	Campbell	2-BIO	While we recognize the need for improved transmission lines as we increase our use of renewable energy and upgrade our energy infrastructure, we cannot support a project that does not adequately mitigate for its impacts to such a highly sensitive and threatened ecosystem such as the Sonoran Desert. The present-day realities of climate change only increase the pressure to preserve and protect the Sonoran Desert, one of the most seriously threatened ecosystems with the greatest projected impacts from climate change.	Chapter 2 (see section 2.4.6 and table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional mitigation considerations.
696	82	82.115	SunZia	Wray	2-BIO	No information on biology of individual species is presented without access to supplementary reports. Appendix E only presents basic information on Endangered Species Act listed species. Without such information, including the potential response of any species to exposure from the impacts of the Southline Project, conclusions regarding the specific (e.g., behavioral response of individuals) or general (e.g., contribution of the Southline Project's effects to overall population trends) impacts of the Southline Project are unsupported.	The Draft EIS considered species and provided basic information for those species. Material in appendix E of the Draft EIS cited other additional information sources about species impacted. This information was considered in preparation of the Draft EIS. Overall impacts were described in section 4.8 of the Draft EIS.
697	82	82.116	SunZia	Wray	2-BIO	No general discussion of a number of potential Southline Project impacts is presented. Transmission lines can have offsite direct and indirect impacts to species susceptible to predation or those that display a negative response to vertical structures or human activity. In those cases, acres of ground disturbance may not adequately reflect the total area of impact.	Relevant portions of section 4.8 of the Draft EIS addressed the potential impacts of predation and human activity (i.e., noise), as well as introduction of transmission line towers.
698	82	82.117	SunZia	Wray	2-BIO	Additional potential impacts not discussed in detail include erosion, sedimentation, and the potential for blasting that will likely disturb sensitive wildlife, such as roosting bats. We request that this deficiency be corrected.	Relevant portions of section 4.8 of the EIS have been modified to address the potential impacts of erosion, sedimentation, and impacts from blasting.
699	82	82.118	SunZia	Wray	2-BIO	The statements regarding the amount of habitat present in the analysis area do not support the conclusions drawn, or they are not stated clearly. Is the intent to state that the loss of habitat in the analysis area will not result in a detectable population change in the analysis area? If so, there is no information about the proportion of the analysis area that could also support each species. If the intent is to make a statement about potential changes in regional populations, the phrasing is unclear and no information is presented on the status of regional populations or the extent of their habitat for any species. Please clarify.	Section 4.8 of the EIS has been revised for clarification.
700	82	82.119	SunZia	Wray	2-BIO	The Big Burro Mountains to Cedar Mountains Potential Cougar Corridor is only discussed in the context of providing habitat, presumably for resident Mountain Lions, and the statements of the potential impacts of the Southline Project (e.g., total acres affected out of total acres in the Corridor) reflect that approach. However, if the intent is to define a movement corridor connecting two blocks of habitat, then the entire corridor is crossed by the Southline Project. To support a conclusion that the Southline Project would have a low impact on the corridor, a discussion of the species' response to project-related actions is required.	Sections 3.8 and 4.8 of the EIS have been revised to clarify impacts to the Big Burro Mountains to Cedar Mountains Potential Cougar Corridor.
701	82	82.120	SunZia	Wray	2-BIO	Table 4.8-21 identifies the Colorado River Toad and Sonoran Green Toad as the same species. They are separate species. This is stated correctly in Table 3.8-8. Please correct by clarifying that these are different species, and identifying the impacts of the Southline Project on each	Section 4.8 of the EIS has been revised and the analysis updated.
702	82	82.121	SunZia	Wray	2-BIO	No information is presented in the form of relative intensity of impacts among alternatives, restricting the comparison of alternatives to one of merely comparing acreage affected. Please also evaluate relative intensity among alternatives	Section 4.8 of the Draft EIS used acreage/area as a surrogate for relative intensities with distinctions provided for the differences between impacts from the New Build and Upgrade sections.
704	82	82.123	SunZia	Wray	2-BIO	The Wildlife section provides acres of impact by vegetation type, but does not identify the locations of that vegetation or connect vegetation to wildlife likely to be present.	Vegetation types addressed in the wildlife section (section 3.8) of the Draft EIS were depicted in figures 3.8-2 and 3.8-3 of the Draft EIS. The scale of these figures has been updated in the Final EIS to allow for a more detailed representation of the existing vegetation types (see figures 3.8-2a–f and figures 3.8-3a–d).
768	83	83.1	Audubon Arizona	Supplee	2-BIO	Audubon Arizona is the state office of the National Audubon Society and as such we respectfully submit the following comments concerning the Draft Environmental Impact Statement (DEIS) for the Southline interstate transmission line. Audubon has specific expertise and knowledge about birds, bird habitats and bird related recreation and economic values, therefore we are limiting our comments primarily to those topics.	Thank you for your comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
769	83	83.2	Audubon Arizona	Supplee	2-BIO	Our specific concern is the new build segment between Hidalgo and Apache sub-stations near Willcox Playa. Audubon Arizona believes the proponent alternative identified as E, F,Ga, Gb, Gc, I, and J segments will reduce the potential of bird strikes significantly. Sandhill crane flight patterns to and from the Playa and also the APECO ash pond are predominately to the south and east. Routing the Southline to the south side of the Playa will likely increase the potential for cranes striking the lines. Birds do fly north-northwest to farm fields in the Bonita area, but not in the same numbers.	Based on feedback by the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative. The potential impacts of the proposed transmission line on wildlife were described in section 4.8 of the Draft EIS. Additionally, APLIC guidelines would be adhered to for minimizing collisions and developing an Avian Protection Plan.
770	83	83.3	Audubon Arizona	Supplee	2-BIO	We offer some observations about and suggestions for bird strike mitigation later in this letter.	Thank you for your comment and sharing information with the lead agencies.
771	83	83.4	Audubon Arizona	Supplee	2-BIO	Willcox Playa/Cochise Lakes Important Bird Area (IBA). This IBA was identified as a Global Important Bird Area in October, 2011 and encompasses the 74 square mile, 47,343 acre Willcox Playa, a broad alkaline lakebed fringed with semi-desert grassland (primarily saltgrass and sacaton) and mesquite. Further details and maps for this IBA are located at http://aziba.org/?page_id=712.The playa is seasonally flooded to a shallow depth. Outlying this playa are the satellite lakes/wetlands of Cochise Lakes (or aka Lake Cochise), alkali flats, and Willcox Playa Wildlife Area containing Crane Lake. The Playa itself is administered by the Department of Defense and the U.S. Army Corps of Engineers. It is not managed in anyway, and is posted no trespassing. On the upper east side of the playa is the Arizona Game and Fish Department managed Willcox Playa Wildlife Area, consisting of 555 acres. There are ten “pot hole” ponds, and one 30-acre impoundment at the Wildlife Area.	Thank you for providing this information. Important Bird Areas were considered in sections 3.8 and 4.8 of the Draft EIS. Detail has been added to section 3.8 of the EIS regarding Willcox Playa/Cochise Lakes.
772	83	83.5	Audubon Arizona	Supplee	2-BIO	The significant avian values are over-wintering Sandhill Cranes and migratory and wintering shorebirds, waterfowl, and waterbirds. The Wildlife Area (Crane Lake), and Cochise Lakes are important sites for roosting, resting, and feeding. Sandhill Cranes depend heavily on the surrounding agricultural lands of the broader Sulphur Springs and Bonita	Habitat for and potential impacts to Sandhill cranes, migratory and wandering shore birds, waterfowl, and waterbirds were considered in sections 3.8 and 4.8 of the Draft EIS. Based on feedback by the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative.
773	83	83.6	Audubon Arizona	Supplee	2-BIO	Valleys for feeding, particularly in fields of waste corn. The site is important to special status avian species such as Swainson’s hawk, scaled quail, chestnut-collared longspur and Cassin’s sparrow. It supports significant concentrations of shorebirds (>100) and cranes (>2000). Willcox Playa and environs supports the second largest over-wintering concentration of Sandhill Cranes (Grus canadensis) in Arizona, typically 4,000 to 9,000 birds (White Water Draw Wildlife Area to the south over-winters 10,000 to 22,000 cranes). There are occasional years when crane numbers spike when a large number of birds (>13,000) from White Water Draw switch to roosting in this area (using either the Playa or Crane Lake).Most significantly both in spring and late summer shorebirds can stop-over in very substantial numbers (400-800 individuals at Cochise Lakes). These in-migration shorebird species using the include: Wilson’s Phalarope (April, May, July, Aug., Sept.), Willet (April), Least Sandpiper (April, Aug., Sept.), Western Sandpiper (April, Aug., Sept.), Long-billed Dowitcher (May, Sept.), Black- necked Stilt (July, Aug., Sept.), and American Avocet (July, Aug., Sept.), plus lesser numbers of other shorebird species (Killdeer, Marbled Godwit, Spotted Sandpiper, Solitary Sandpiper, Greater Yellowlegs, Long-billed Curlew, Baird’s Sandpiper, Pectoral Sandpiper, Stilt Sandpiper, and Red-necked Phalarope). Small numbers of some shorebirds occasionally breed within the IBA, including American Avocet and rarely Snowy Plover (Audubon WatchList 2007-Yellow, AZGFD Species of Greatest Conservation Need 2006).	Habitat for and potential impacts to Sandhill cranes, migratory and wandering shore birds, waterfowl, and waterbirds were considered in sections 3.8 and 4.8 of the Draft EIS. In particular, see table 3.8-11 for a list of all species considered. Based on feedback by the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative.
774	83	83.7	Audubon Arizona	Supplee	2-BIO	Ducks over-winter on the lakes in large flocks, primarily composed of American Wigeon, Northern Shoveler, Ruddy Duck, Lesser Scaup, Ring-necked Duck, Cinnamon Teal and Green- winged Teal. In rare very wet winters, waterfowl in huge numbers (>15,000, half or which are Green-winged Teal) come to feed and rest within the Playa.	Habitat for and potential impacts to ducks were considered in sections 3.8 and 4.8 of the Draft EIS. In particular, table 3.8-11 of the Draft EIS includes a list of all species considered.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
775	83	83.8	Audubon Arizona	Supplee	2-BIO	In a 2005 USDA Forest Service Technical Report, Manville said that collisions with power transmission and distribution lines are estimated to kill as many as 175 million birds annually, and an additional tens to hundreds of thousands more birds are electrocuted. The difficulty with quantifying the impact of these utilities is that due to great expanse of area they cover they are poorly monitored for both strikes and electrocutions (Manville 2005). In the San Luis Valley of Colorado, collisions with transmission lines were one of the contributing mortality factors to the experimental whooping cranes population. On certain sections of transmission lines in the San Luis Valley where wetlands and agricultural foods are bisected by transmission lines, Sandhill Crane collision events have been as high as 75 birds a night (Mark Smith pers. comm.). A 2000 report completed for Idaho Hells Canyon transmission line complex summarized the following factors contributing to the susceptibility of a bird species to collision and the risks associated with a transmission line (Bevanger 1994). (1) biological, (2) topographical, (3) meteorological, and (4) technical aspects. Biological aspects to consider include bird vision, flight abilities, flight speed, activity patterns, and behavior during displays, hunting, or landing. Topographical factors to consider include the transmission line height and alignment in relation to the surrounding terrain. Bird flight lanes often concentrate in low spots in the landscape, e.g., river drainages. Lines that run perpendicular to these areas are more apt to be hit by birds. Line siting in the Sulphur Springs Valley segment of Arizona should consider these factors and obtain information about the major Sandhill crane and avian flight corridors north to south across Interstate 10 between the Willcox Playa and Bonita valley to the north and south and south west from Wilcox Playa to farm fields in Kansas Settlement. The ideal mitigation in high risk areas for bird strike is to bury the line. Research at diverse locations reveals that Sandhill crane collisions with power lines are most prevalent for birds moving to and from feeding and roosting locations. An inferior solution to buried lines is installation of avian collision averters as recommended by Murphy, etal. 2009.	Thank you for providing this information. Based on feedback by the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included as a part of the Agency Preferred Alternative. Mitigation measures proposed, including use of avian flight diverters, were included in table 2-7 (now table 2-8 in the EIS) and section 4.8 of the Draft EIS. Sections 3.8 and 4.8 of the EIS have been revised to include information from the report cited.
776	83	83.9	Audubon Arizona	Supplee	2-BIO	Riparian Areas. We appreciate the use of an existing power line corridor in the vicinity of the San Pedro River valley. Audubon Arizona favors the Proponent preferred and agency proposes routing. The proponent alternative route H would also be acceptable as it parallels existing disturbances. Design of the transmission lines at the San Pedro River crossing should be such that removal of riparian trees is minimal and avoid the trimming (topping) or cutting down of riparian vegetation. It is not clear in the DEIS if the height of the lines over riparian area crossings is sufficient to eliminate the need to clear or top trees underneath. We would extend this recommendation to other riparian corridor crossing locations such as the Santa Cruz River.	The BLM and Western share the commenter's concerns about riparian crossings, and have proposed using existing crossings in part because of those concerns. As described in chapter 2 and section 4.8 of the Draft EIS, riparian areas would be spanned and vegetation would not be topped unless necessary to avoid potential safety issues and meet clearance requirements.
777	83	83.10	Audubon Arizona	Supplee	2-BIO	The Arizona Partners in Flight Bird Conservation Plan states, "Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance, recreational value, and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996)… Riparian woodlands are among the most severely threatened habitats within Arizona…. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests should be among the top conservation priorities in the state". http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf	The BLM and Western share the commenter's concerns about riparian crossings, and have proposed using existing crossings in part because of those concerns (see chapter 2 of the Draft EIS). In addition, to minimize impacts on riparian woodlands, these areas would be spanned and vegetation removal limited to the minimum amount necessary to avoid potential safety issues and meet clearance requirements. Sections 3.8 and 4.8 of the EIS have been revised to include information from the report cited.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
778	83	83.11	Audubon Arizona	Supplee	2-BIO	The San Pedro River is a unique and extremely important biological asset in the arid southwest. As one of the few undammed and flowing rivers the San Pedro functions as a vital corridor and refugia habitat for a wide diversity of plants and animals and exhibits a remarkably intact riparian system including extensive stands of Fremont cottonwood (Populus fremontii), Goodding's willow (Salix goodingii) gallery forest and large mesquite (Prosopis velutina) bosques. Duncan and Slagle (2004) describe the San Pedro River as one of the most significant perennial undammed desert rivers in the United States. Species that are listed or proposed for listing under the Endangered Species Act are represented in sustainable numbers within this corridor. The National Audubon Society has recognized the San Pedro River corridor as a globally Important Bird Area (IBA). The values that earn this recognition include some of the highest nesting densities of riparian obligate birds in the western United States and a critically important fall and spring migration corridor for thousands of neotropical migrants. Further information about the two San Pedro River Important Bird Areas is available at http://aziba.org/?page_id=461 and http://aziba.org/?page_id=539 IBA designation is particularly relevant to protecting critical habitat utilized by birds during some part of their life cycle (breeding, feeding, nesting, and migrating) as well as conserving the general biodiversity of wildlife species. Over 100 species of breeding birds and another approximately 250 species of migrant and wintering birds occur in the area, representing roughly half the number of known breeding species in North America. The San Pedro River serves as a migratory corridor for an estimated 4 million migrating birds each year. Notably, 36 species of raptors, including the gray hawk (Asturina nititda = Buteo nitidus), Mississippi kite (Ictinia mississippiensis), common black hawk (Buteogallus anthracinus), and zone-tailed hawk (Buteo albonotatus) can be found within the San Pedro River watershed. Regarding the gray hawk, the San Pedro is thought to support more than 40 percent of the nesting gray hawks in the United States. Land birds occurring in significant numbers/density and/or diversity include Bell's vireo (Vireo bellii), Lucy's warbler (Vermivora luciae), and Yellow warbler (Setophaga petechial = Dendroica petechial).	Thank you for providing this information. The BLM and Western share the commenter's concerns about crossing the San Pedro River and have proposed using existing crossings in part because of those concerns (see chapter 2 of the Draft EIS). In addition to minimizing impacts on the San Pedro River, it would be spanned and vegetation removal limited to the minimum amount necessary to avoid potential safety issues and meet clearance requirements. The biological importance of the San Pedro River and the potential impacts to habitat associated with the river were addressed in sections 3.8 and 4.8 of the Draft EIS.
780	83	83.13	Audubon Arizona	Supplee	2-BIO	We applaud the proponent and BLM for considering the issue of introducing invasive plant species. Of particular concern is introduction of invasive plant species including but not limited to African buffelgrass (Pennisetum ciliaris), blue panic (Panicum antidotale, a Federal Noxious Weed), bermuda grass (Cynodon dactylon), Sahara mustard (Brassica tournefortii), and another African grass, Lehman's Lovegrass (Eragrostis lehmanniana). The highest risk of invasive species spread is by being carried on vehicles and equipment during construction and also during post- construction maintenance.	The BLM and Western share your concerns about invasive plant species and have proposed mitigation measures shown in table 2-7 (now table 2-8 in the EIS) and in section 4.8 of the Draft EIS to minimize the establishment and spread of noxious and invasive weed species. Thank you for your comment.
783	84	84.3		Kestler	2-BIO	If at all possible find ways to reduce likelihood of birds flying into the lines. I'm told there are sound frequencies that will minimize birds touching the live power lines.	As stated in chapter 2 and section 3.8 in the Draft EIS, an Avian Protection Plan would be a Project-tailored plan designed to reduce collision mortality that results from avian interactions with electric utility facilities. Section 3.8 of the EIS has been revised for clarification.
790	86	86.2	New Mexico Department of Game and Fish	Wunder	2-BIO	In general, the DEIS is difficult to read and distinguish between alternatives, local alternatives, routes and subroutes. On pages xxiii of the Executive Summary, it states that specific reasonable mitigation measures to reduce adverse effects to wildlife and habitats "could" be implemented. However, later chapters seem to suggest these mitigation activities will occur. The final EIS should definitely state that these reasonable mitigation measures will be implemented by the project proponent.	Tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) included a comparison of potential impacts by alternatives. Maps throughout the Draft EIS included color coding indicating alternative type (local, proponent, etc.). Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation.
791	86	86.3	New Mexico Department of Game and Fish	Wunder	2-BIO	Chapter 4 Environmental Consequences does not seem to correctly identify and quantify that Route Group 1, Subroute 1.2 (southernmost route) would impact significantly more Crane Migration Corridors and Wintering Areas (as identified by NMDGF), Bird Habitat Conservation Areas (as identified by the multi-agency Inter-Mountain Joint Venture), and undeveloped habitat.	Section 4.8 of the EIS has been revised to clarify impacts to Crane Migration Corridors and Wintering Areas, Bird Habitation Conservation Areas, and undeveloped habitat along subroute 1.2.
792	86	86.4	New Mexico Department of Game and Fish	Wunder	2-BIO	We believe that construction of Subroute 1.2 would cause cumulative effects from new habitat disturbance, fragmentation and loss, and migratory bird mortality that would be significant when compared to the Agency Preferred Alternative (Subroute 1.1)	The lead agencies agree with the commenter, and this is one reason that subroute 1.2 was not identified as the Agency Preferred Alternative in the Draft EIS. Sections 4.8.1 and 4.8.2 of the Draft EIS discuss the potential direct and indirect (not cumulative) impacts to biological resources in terms of habitat disturbance, fragmentation and loss, and avian mortality. Section 4.21 of the Draft EIS discusses the potential cumulative effects of the proposed Project.
794	86	86.6	New Mexico Department of Game and Fish	Wunder	2-BIO	LD-2 avoids direct impact to the Lordsburg Playa, but would be situated between playa basins and would likely cause mortality to migratory birds flying between basins. If LD-2 is chosen for implementation, bird diverters should be installed on the transmission lines to decrease the potential for bird strikes.	As stated in chapter 2 and section 3.8 in the Draft EIS, an Avian Protection Plan would be a Project-tailored plan designed to reduce avian collision mortality that results from avian interactions with electric utility facilities. Bird diverters will be used for the final route selected, as described by APLIC (2006). LD2 is not included in the Agency Preferred Alternative in the Final EIS.
795	86	86.7	New Mexico Department of Game and Fish	Wunder	2-BIO	However, the Department believes that LD3-A would cause significantly less mortality to cranes and other migratory birds than installing bird diverters on LD-2 transmission lines.	Section 4.8 of the EIS has been revised based on this comment. LD3a is included in the Agency Preferred Alternative in the Final EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
13	7	7.1	Hopi Tribe	Kuwanwisiwma	3-CUL	We concurred that this proposal is likely to adversely affect numerous prehistoric cultural resources significant to the Hopi Tribe and stated that we can 't really determine effects until an alignment is determined, and that it seems the BLM is working for the proponent because the BLM's objective is to provide the proponent with the right-of-way grant.	As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). BLM's decisions to be made are outlined in table 1-1. No one can assess the impacts to historic properties (NRHP eligible or listed) until the final route is determined. A Programmatic Agreement (PA) is being developed since "… effects on historic properties cannot be fully determined prior to the approval of the undertaking" (36 CFR 800.14(b)(ii)). This PA provides the process by which BLM will identify, evaluate, and resolve adverse effects to historic properties and is being developed in consultation with many parties (see appendix L). Please note that is the BLM and Western's preference to first avoid impacts to cultural resources; avoidance is the first step in the BLM's regional mitigation hierarchy, as described in chapter 2.
14	7	7.2	Hopi Tribe	Kuwanwisiwma	3-CUL	We have now reviewed the DEIS/RMPA that states that only 7% of the analysis has been previously surveyed and 997 archaeological sites and or historic bui lt environmental resources have been previously recorded. Tumamoc Hill and Mount Graham are identified as resources of concern to tribes. We again note the scant cultural resource data, and that the cultural resources survey will not be conducted until after the Record of Decision has been made and an alternative is selected.	This information was stated and acknowledged in sections 3.9 and 4.9 and appendix L (the PA) of the Draft EIS. The regulations for the NHPA are clear that Class III inventory does not have to take place prior to the ROD and they specify that in such a case a PA be developed. The draft Southline PA requires a Class III inventory of the area of potential effects (36 CFR 800.14 (b)(ii)) (see appendix L). The discovery of a large or important historic property may result in rerouting of the Agency Preferred Alternative.
15	7	7.3	Hopi Tribe	Kuwanwisiwma	3-CUL	We understand the BLM is attempting to develop a Programmatic Agreement to address the 7% cultural resource identification. Therefore we reiterate our request for continuing consultation on this proposal incl uding being provided with copies of the cultural resources survey of the area of potential effect and any proposed treatment plans for review and comment.	This information was stated and acknowledged in sections 3.9 and 4.9 and appendix L (the Programmatic Agreement) of the Draft EIS.
46	15	15.14	BIA		3-CUL	Page 1129, line 13: Should include THPOs.	Section 5.5 in chapter 5 of the EIS has been revised to include tribal historic preservation offices (THPOs).
163	32	32.9	EPA	Jansky/Weeks	3-CUL	Cultural Resources. Chapter 4; section 4.9 and 4.10. The project as a whole has been determined to have adverse effects to cultural, archeological, and historical resources. Some of these impacts are directly to the resources in question, and others are visual impacts associated with these resources. Each route group has surveyed resources that will be affected, under evaluated resources where determinations of eligibility have yet to be completed, and large areas that have not been surveyed. Due to the projects size and clear potential for adverse effects to occur, a Programmatic Agreement (PA) for the proposed project is currently being developed to comply with 36 CFR 800.4(b)(2) and 800.14(b)(1)(ii). According to the DEIS, the PA is a legally binding document which will outline the process that will be followed to identify, evaluate, and mitigate historic properties that may be affected by the proposed project. Recommendation: The proposed project will have many direct and indirect adverse impacts to cultural, archeological, and historical resources. Include a finalized PA, signed by all the parties listed in the Draft PA, in the FEIS. Also include any correspondence between the signatories of the PA, such as, consultation with any Tribal Historic Preservation Officer (THPO), State Historic Preservation Officer (SHPO), and Federal or State agency	Chapter 5 of the EIS has been revised to include additional information regarding tribal consultation. The final PA is in the EIS (see appendix L) and must be finalized prior to a decision by the BLM or Western.
335	68	68.12	Pima County	Bernal/Connolly	3-CUL	survey, documentation and mitigation of impacts to archaeological and historic sites and other cultural resources;	The potential impact of the proposed transmission line on cultural resources, including archaeological and historic sites, was analyzed in section 4.9 of the Draft EIS. As discussed in section 4.9 of the Draft EIS, the Project-specific PA stipulates the areas of potential effects (APEs) for this Project and the "direct effects" APE would be inventoried at the Class III level (see appendix L of the EIS).
336	68	68.13	Pima County	Bernal/Connolly	3-CUL	exacerbation of impacts to Tumamoc Hill;	The proposed local alternatives were formulated by local stakeholders specifically to reduce potential impacts to biological and cultural resources. The potential impacts to Tumamoc Hill were described in the relevant sections of chapter 4 of the Draft EIS. Adverse effects to this historic property will then be assessed as stipulated in the executed PA. Pima County has actively participated as a Section 106 Consulting Party and is also an invited signatory to the PA. A draft PA was included as appendix L to the Draft EIS; a final PA is included in the Final EIS.
356	68	68.33	Pima County	Bernal/Connolly	3-CUL	An important concern for Pima County is to protect its designated Conservation Areas and other properties owned and managed for cultural resources preservation purposes, including several intersected by the proposed Southline Transmission Line alignment, such as Empirita Ranch (National Register Listed), Valencia Site (National Register Listed, and Tumamoc Hill (National Register Listed as an Archaeological District and as a National Historic Landmark). We have grave concerns about the potential for Adverse Effects on these resources, in particular Valencia Site and Tumamoc Hill, and we ask that the HPTP closely follow the requirements of Section 106, and NEPA, and address adverse effects to these important resources.	As described in section 4.9 of the Draft EIS, adverse effects to historic properties would be assessed as stipulated in the executed PA, which has been developed to comply with Section 106 of the NHPA. Pima County has actively participated as a Section 106 Consulting Party and is also an invited signatory to the PA. A draft PA was included as appendix L to the Draft EIS; a final PA is included in the Final EIS (see appendix L).

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
357	68	68.34	Pima County	Bernal/Connolly	3-CUL	Tumamoc Hill is threatened by the greatest potential threat from the Southline upgrade of the existing Western right of way. We have expressed these concerns consistently throughout the public review and Section 106 processes at many meetings. We continue to argue for the avoidance of Tumamoc Hill and we restate our preference that the transmission line be removed from the vicinity of Tumamoc Hill. We prefer the proposed Local Alternatives developed for Route Group 4, including TH3-OPTION and TH3B, which follow the existing utility corridor along the Santa Cruz River, well to the east of Tumamoc Hill, removing any potential adverse effect to Tumamoc Hill. The DEIS includes the Agency Preferred Alternative, which avoids Tumamoc Hill by using several subroute alternatives to pass by Tumamoc Hill on the west side, using Greasewood Road. While we appreciate the intent to avoid impacting the Hill, this alternative presents its own set of problems, including a right of way between 100-150 feet wide still needs to intersect the National Register-listed Tumamoc Hill, the problem of accessing each transmission line pole from the adjacent streets, the potential to adversely affect the historic fence surrounding Tumamoc Hill (a contributor to the National Register listing), and the significant potential for adverse visual effect because of proximity to Tumamoc Hill as well as the neighboring residential subdivisions in the area.	The comment accurately reflects the analysis of impacts to Tumamoc Hill throughout the Draft EIS. Local alternative segments TH3a and b, and TH3-Options A, B, and C, are alternatives considered in detail and are not located on Tumamoc Hill. Since the fence is a feature within the NHL and the National Register District, it will be fully considered in the efforts to avoid, minimize, and mitigate any adverse effects to the entire historic property, including the fence, which is a contributing element.
359	68	68.36	Pima County	Bernal/Connolly	3-CUL	p. xxv in Section 7.8, Lines 9-14: Lists impacted sites, including National Register-listed or eligible sites; Valencia Site, Empirita Ranch, Tumamoc Hill. Does not list important sites that are considered, but not determined, eligible, such as West Branch Site.	The West Branch site is considered appropriately in the Draft EIS. The executive summary of the Draft EIS includes only listed properties. This is appropriate, as the West Branch is not the only site that is clearly eligible, but has not been placed on the National Register. Listing all of these sites in the executive summary would not change anything in terms of analysis, and it would add unnecessary length to the summary.
362	68	68.39	Pima County	Bernal/Connolly	3-CUL	p. 44, Chapter 2, discussion of HPTP, lines 24-30: The discussion includes avoidance, minimization, and mitigation of impacts with reference to the HPTP, but there is no mention of cultural resources monitoring needed during construction, or a program of monitoring to assess long-term effects of the transmission line during its use life, or the need to monitor certain maintenance and repair activities that might occur during the transmission line use life, and any use, repair, or maintenance of access roads. There is no mention of the need to conduct cultural resources monitoring at the end of the transmission line use life during Decommissioning activities. All these listed activities have potential for Adverse Effects on cultural and historic resources.	As stated in chapter 2 of the Draft EIS, the HPTP would be developed pursuant to the PA, which Pima County is a party to. As discussed in the PA in appendix L of the Draft EIS, if decommissioning takes place in the future, it would be considered a separate undertaking when it occurs. Chapter 2 of the EIS has been revised to clarify this. Monitoring is built into much of the process as detailed in the draft PA (III.A.i.). A Monitoring and Discovery Plan will be included in the HPTP. The need for and utility of monitoring is addressed on a site by site basis, depending on the circumstances. Most maintenance and repair activities should not require monitoring, although some activities may warrant it. In the HPTP, there will be a list of operations and maintenance activities that will not require additional Section 106 review. Any other activities would warrant a review, and a requirement for monitoring may result. The operation of the transmission line should not cause long-term adverse effects to historic properties remaining in the APE. Historic properties that could be adversely affected by operations and maintenance would be mitigated during construction. A final PA is included in the Final EIS.
363	68	68.40	Pima County	Bernal/Connolly	3-CUL	p. 58, Table 2-3 compares the disturbances of various possible transmission pole types and construction methods, identifying the single-pole tabular steel pole to have the smallest footprint (on p. 58), but the point is that all poles and construction methods cause ground disturbances with a potential to impact cultural resources that should be taken into account.	The comment accurately reflects the analysis provided in chapter 4 of the Draft EIS.
365	68	68.42	Pima County	Bernal/Connolly	3-CUL	Table 2.7 Design Features for Environmental Protection by Resource; mentions that cultural resources survey reporting requirements will follow BLM Handbooks, but should also state that (in Arizona) reporting shall meet standards of ASM and AZ-SHPO. Same table does not indicate the HPTP will mitigate impacts from the Decommissioning at the end of the transmission line's use life. The effects on cultural resources from Decommissioning activities should be taken into account.	As stated in chapter 2 of the Draft EIS, the HPTP would be developed pursuant to the Section 106 PA and would include provisions for monitoring and discovery (see table 2-7 of the Draft EIS, now table 2-8 in the EIS). Pima County is a Section 106 Consulting Party and an Invited Signatory to the PA. Therefore, Pima County has been involved in the consultations for the Project and will continue to provide their feedback as the PA is executed and implemented. Reporting standards are detailed in the PA (Section VII) and include both Federal and State (NM and AZ) standards. As discussed in the PA in appendix L of the Draft EIS, if decommissioning takes place in the future, it would be considered a separate undertaking when it occurs.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
366	68	68.43	Pima County	Bernal/Connolly	3-CUL	p. 110, Chapter 2, 2.4.5 Decommissioning: There is no discussion of potential adverse effects of Decommissioning Activities and the need for cultural resources monitoring.	As discussed in the PA in appendix L of the Draft EIS, if decommissioning takes place in the future, it would be considered a separate undertaking when it occurs. For the purposes of Section 106 of the NHPA, decommissioning would be a new action for Section 106 review, and historic properties potentially affected by decommissioning would be considered in the BLM-approved Termination and Reclamation Plan in accordance with the pertinent laws, regulations, and policies extant at the time. Chapter 2 has been revised in the EIS to include similar language. Monitoring is built into much of the process as detailed in the draft PA (III.A.i.). A Monitoring and Discovery Plan will be included in the HPTP. The need for and utility of monitoring is addressed on a site by site basis, depending on the circumstances. Most maintenance and repair activities should not require monitoring, although some activities may warrant it. In the HPTP, there will be a list of operations and maintenance activities that will not require additional Section 106 review. Any other activities would warrant a review, and a requirement for monitoring may result. The operation of the transmission line should not cause long-term adverse effects to historic properties remaining in the APE. Historic properties that could be adversely affected by operations and maintenance would be mitigated during construction. A final PA is included in the Final EIS.
372	68	68.49	Pima County	Bernal/Connolly	3-CUL	p. 336, Chapter 3, Section 3.9.5, Cultural Resources: The discussion of the Class I records search defines the visual effects corridor as 10 miles centered on the transmission line (p. 332, lines 1-5). The cultural resources analysis area for the upgrade section cites the "existing 500- foot" right of way corridor. The Western easement (1950) includes a legal description right of the alignment, but does not define a specific width or any dimension to the right of way, so this assumed dimension of 500 feet is an unsupported claim by Western that should be negotiated with land owners/managers whose lands are crossed by the transmission line before construction can take place.	Section 3.9.5 of the EIS has been revised to clarify that the existing ROW is 100 feet and the analysis area for the upgrade is 500 feet.
373	68	68.50	Pima County	Bernal/Connolly	3-CUL	The Class I Records Search Methods are described in this section; used City of Tucson records for list of National Register Properties and Districts. Did not use Pima County's up-to-date comprehensive list of National Register-listed Historic Properties and Districts.	Section 3.9 of the EIS has been revised to clarify that Pima County data were also used in the development of the analysis.
374	68	68.51	Pima County	Bernal/Connolly	3-CUL	Figure 3.9-1b depicts Archaeology Southwest's Cultural Resources Priority Areas in the upgrade section (southern Arizona). Pima County has useful cultural resources sensitivity mapping based on the Cultural Resources Element of the Sonoran Desert Conservation Plan that is based on expert knowledge and incorporates known associations of recorded sites with mapped environmental zones (Conservation Lands System) to develop predictive mapping of projected areas of cultural sensitivity in eastern Pima County. This sensitivity mapping is available to public access and GIS files can be shared on request. While limited to Pima County, the sensitivity mapping does cover a large portion of the Southline upgrade section and could contribute to refining the Class I inventory results.	Sections 3.9 and 4.9 have been revised in the EIS to include additional cultural resources sensitivity mapping provided by Pima County.
379	68	68.56	Pima County	Bernal/Connolly	3-CUL	p. 577, Chapter 4 Environmental Consequences: p. 813, Chapter 4.9 Cultural Resources, Section 4.9.2, lines 22-24, describe the Southline upgrade section right of way as 150 feet wide, but as mentioned, this is not a legally defined right of way and needs to be negotiated with land owners/managers. Direct effect analysis area determined to be 100 feet either side of the right of way, total 350 feet wide corridor.	As described in chapter 2 of the Draft EIS, the new 230-kV line would be built 50 feet away from the edge of the existing 100-foot ROW, parallel to the existing line. This would allow the existing line to remain in service until the new line is energized, at which point the existing line would be decommissioned and removed. The existing ROW would then be abandoned, except for a 25-foot-wide strip along the edge, which would become part of the new 150-foot ROW. ROW and land acquisition were described in chapter 2 of the Draft EIS as well.
381.1	68	68.57	Pima County	Bernal/Connolly	3-CUL	p. 814-815 Resource Forecasting. This discussion has better data for the upgrade section from survey, but contains an extended description that attempts to quantify the forecast of potential numbers of sites within the APE that seems needlessly complicated and drawn out. It uses formulae developed in other areas that may be appropriate, but again, this section is overly complicated and unnecessarily "scientistic."	Predictive modeling is a complicated mathematical and statistical exercise. It is necessary to explain this process in the EIS to support the results of the modeling. These results are the basis of the analysis, which is presented and explained in the EIS.
381.2	68	68.58	Pima County	Bernal/Connolly	3-CUL	No matter how well developed a mathematical formula is, its calculations and results are no better than the fundamental assumptions underlying the exercise. The description is valid for the DEIS, and does provide numbers that can be used for planning mitigation, etc., but it should be placed in a more realistic context to avoid the danger of estimated numbers of sites becoming conceptually realized and treated as if they are real entities, rather than well based guesses. The relative accuracy and reliability of such forecasting should be explained.	The purpose of the predictive modeling is to forecast the potential for historic properties, both in density and sensitivity, and is necessary for the NEPA analysis. Although the results of the model could be used for other purposes, such as planning for the Proponent, this is not how BLM will be using it. NEPA analysis necessarily relies on assumptions and predictions, but the Section 106 process does not. The Section 106 process requires that the agency official “take the steps necessary to identify historic properties within the area of potential effects” (36 CFR 800.4(b)). The only sites that will be considered through the Section 106 process will be actual sites located on the ground, within the area of potential effects. Section 3.9 of the Draft EIS was reviewed in light of this comment, and no changes to the text were found to be necessary for the EIS.
382	68	68.59	Pima County	Bernal/Connolly	3-CUL	p.817, lines 24-43, We appreciate this section's discussion of some of the flaws of the quantitative forecasting methods	Thank you for your comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
383	68	68.60	Pima County	Bernal/Connolly	3-CUL	p.818, lines 1-12, Archaeological Sensitivity: Using the scale of 1-5 seems to be a simpler, more direct method of making site estimates	Thank you for your comment.
384	68	68.61	Pima County	Bernal/Connolly	3-CUL	p. 850 Table 4.9-13 Route Group 4 Projects site numbers and site density, based on known sites (determined by previous survey) and should provide reliable measures of cultural resources impacts. Subroute 4.1 is shown to contain higher site numbers and site density; these are useful, if already known data.	The comment accurately reflects the analysis provided in section 4.9 of the Draft EIS.
385	68	68.62	Pima County	Bernal/Connolly	3-CUL	p. 853 Visual Analysis, also shows high resources numbers and density, so visual impacts should reflect this.	The comment accurately reflects the analysis provided in section 4.9 of the Draft EIS.
386	68	68.63	Pima County	Bernal/Connolly	3-CUL	p. 855, Direct impacts on cultural resources also determined this way and should give good estimates of effect.	The comment accurately reflects the analysis provided in section 4.9 of the Draft EIS.
387	68	68.64	Pima County	Bernal/Connolly	3-CUL	p. 861-862, Substations and Substation Expansions: on p. 862, line 3, Valencia Site is shown to be within the footprint of the Del Bac substation expansion. The HPTP should take this into account and address such impacts.	As stated in section 4.9 in the Draft EIS, measures to avoid, minimize, and/or mitigate any adverse effects on historic properties would be developed by BLM in consultation with the Section 106 consulting parties. As stated in chapter 2 of the Draft EIS, the HPTP would be prepared pursuant to the PA.
555	79	79.8	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	In addition, the Comparison of Alternatives discussion presented in Section 2.10 does not include some of the information on cultural resources that is presented in Chapters 3 and 4. The only information discussed in section 2.10 for each alternative was the number of known cultural resources, listed properties, trails, and the number of forecast cultural resources. The Comparison Summary, Table 2-11 provided numbers for estimated NRHP eligible resources and Impact Intensity but this information should have also been included in the discussion of each alternative to help inform on the best route with regards to cultural resources. Other information presented in Chapter 3, but not used in the Comparison of Alternatives, is the number of features digitized off of historic maps. As currently presented, Chapter 2 does not contain much information on the archaeological sensitivity analysis that is presented in Chapters 3 and 4 and we wonder why so much time was devoted to this complex analysis.	Tables 2-11, 2-12, 2-13, and 2-14 in chapter 2 of the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) have been revised to include more summary detail. Please note that chapter 2 is a description of the proposed Project and its alternatives, and the summary of impacts tables are necessarily brief. Chapter 3 describes the affected environment, and chapter 4 presents the analysis of the environmental consequences. Both chapters 3 and 4 are much richer in detail concerning the actual resources and the potential impacts.
556	79	79.9	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Given the large number of alternatives and general paucity of cultural resource information in the project area, Class II survey along each alternative, or in areas predicted to have a high number of cultural resources based on current data, would have provided more specific information on the estimated number of cultural resources that have the potential to be impacted.	We agree that a Class II inventory would provide more specific information, but BLM determined that due to the availability of the predictive model for southern New Mexico and the high percentage of previous inventory for the upgrade (approximately half of the undertaking), Class II inventory would not be necessary for the NEPA analysis. Cultural resources are just one of the resources considered in the selection of the Agency Preferred Alternative and when considered in the larger context, most often do not drive the decision-making. Other resources that are more difficult to mitigate, or physical circumstances, tend to be the major factors in the NEPA decision. Additional information on trial crossings based on inventory done for SunZia and reconnaissance done by BLM has been added to the EIS (see appendix F).
557	79	79.10	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Field visits to proposed crossings of the Butterfield Trail would also provide information on whether proposed transmission lines will cross intact segments of the Trail. Class II survey data and visits to Butterfield Trail crossing would be more meaningful information that could assist in the evaluation of alternatives.	BLM determined that this additional information would not be necessary for the evaluation of the alternatives. BLM will attempt to avoid as many crossings of the Butterfield Trail as possible, and the Agency Preferred Alternative would achieve that objective, as opposed to the other alternatives. Wherever the trail is crossed, in accordance with the PA for the project and the resulting HPTP, measures would be taken to avoid, minimize, and mitigate any adverse effect to that segment of trail, provided that that particular segment is determined to be a historic property.
558	79	79.11	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Page 148, Table 2-11, Comparison Summary for Subroute 1: Afton Substation to Hidalgo Substation (Continued). In the row Cultural Resources, Agency Preferred Alterative column, the table states that the impacts are the "Same as subroute 4. 1." This should be "Same as subroute 1.1."	Chapter 2 of the EIS has been revised based on this comment.
559	79	79.12	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Pages 339-340, Figures 3.9-la and 3.9-lb. Archaeology Southwest's Cultural Resource Priority Areas are indicated as a hatched area but not labeled with the name of the area. The name should be provided on the Figure to make it easier for the reader.	Figures in the EIS were not modified; the priority area names are available in the Project Record.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
560	79	79.13	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Page 364, Line 13, Table 3.9-14. It is unclear how the numbers presented in this table were generated. It was my understanding from reading the Sensitivity Measures discussion on page 337 and Section 3.9.9, pages 355-360, that the table presented the numbers of known cultura] resources and their sensitivity level. Based on my reading of these pages, it would seem Low Sensitivity (l) sites are sites that have been determined not eligible. Table 3.9-14 lists 38 sites with low sensitivity in Route group 1. However, on page 356, the text says that there are 20 not eligible sites. Additionally, high sensitivity sites (5) include listed sites, historic towns, NHT, NHLs and cemeteries or gravesites. On page 356, the text discusses one NHL that is listed, three historic trails and 2 Cultural Resource Priority Areas (CRPA). Table 3.9-14 lists 9 sites as being high sensitivity. Perhaps there some discussion needs to preface the Table to explain how these numbers were generated and how they are different from what was previous]y presented in the discussion in Section 3.9.9.	Section 3.9 of the EIS has been revised based on this comment.
561	79	79.14	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Page 366, Line 40, Page 367, Table 3.9-15, Page 368, Line 4 and Table 3.9-16. Need to change "New Mexico State Register of Historic Places" to "New Mexico State Register of Cultural Properties."	Section 3.9 of the EIS has been revised based on this comment.
562	79	79.15	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	3-CUL	Pages 823-825, Tables 4.9-1. 4.9-2 and 4.9-3 and Pages 834-836, Tables 4.9-5, 4.9-6 and 4.9- 7 should include totals at the bottom of each column to get a better understanding of the number of cultural resources, etc. that will be impacted for each Subroute.	Tables in section 4.9 of the EIS have been revised based on this comment.
693	82	82.112	SunZia	Wray	3-CUL	Section 4.9.1 Index of Total Potential Effect (New Mexico) oversimplifies the total number of eligible site acres by ignoring unevaluated sites which may be eligible for the National Register of Historic Places (“NRHP”). For example, of 710 Archaic sites in the sample, 191 were recommended or determined eligible, while 28 were recommended or determined not eligible. This leaves a total of 491 Archaic sites, which should all be treated as eligible, or at the very least be taken into consideration as a third category within the predictive model. This applies to all site type categories, particularly Protohistoric sites which are rare, and are more likely to be eligible by today’s recording standards.	The predictive model did not provide eligibility information, but this information was gathered subsequently so that site sensitivity could be taken into consideration. We agree that eligible or not eligible oversimplifies site sensitivity in general, and that is why the sensitivity categories developed during the SunZia EIS were adopted for the Southline Project. Although we could have treated unevaluated sites as eligible, or could have provided another category for those sites, we feel that when using predictive modeling, many assumptions are made, and the ultimate result is an educated guess as to how many sites, eligible or not, would be encountered. For NEPA, predictive modeling based on previously recorded sites and surveys is common, and BLM’s predictive model provided an additional technique for prediction. Ultimately, the Class III inventory will identify all of the historic properties that could be affected by the undertaking, regardless of what was predicted using modeling.
694	82	82.113	SunZia	Wray	3-CUL	Unfortunately, this oversimplification is incorrectly carried forward in the Draft EIS for determining sensitivity areas and we request that it be corrected.	BLM does not agree that there has been an oversimplification, nor that it has any real bearing on the results of the prediction of site sensitivity in the analysis area. Expanding the analysis as the commenter suggests will not change the outcome of the selection of the Agency Preferred Alternative. This does not need to be corrected.
20	8	8.5		Anderson	19-VIS	I note that the Proponent Alternative from Wilcox AZ to Afton NM: 3. It would move any “adverse visual impact” from the vicinity of I-10 to the rarely used border highway. Seems it would be more attractive for all concerned.	This information was stated and acknowledged in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS.
25	9	9.5		Cotignola	19-VIS	Plus they will discover the low land taxes & they will discover Southern Luna Counties many many mountain views	The potential for Project related employment and changes in social and economic conditions was discussed in sections 3.15 and 4.15; visual impacts were analyzed in sections 3.10 and 4.10 of the Draft EIS. The potential cumulative effects of the proposed Project, along with other past, present, and reasonably foreseeable actions, were described in section 4.21 of the Draft EIS.
144	27	27.3	New Mexico State University’s Unmanned Aircraft Systems Flight Test Center	Zaklan	19-VIS	3. How will you be documenting the building of the lines from a visual perspective?	This information was stated and acknowledged in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS, which provides a comprehensive analysis of existing conditions and potential impacts of the proposed facilities, including impacts from construction and operation. Visual simulations were also included in appendix K of the Draft EIS. Based on feedback from the public and cooperating agencies, new simulations have been included in the Final EIS.
197	38	38.14	Hearing	Yordani	19-VIS	And then I'm concerned about how much of an eyesore there will be for those looking at the towers. And as a city and a county are we able to stop something like this? And then how much of any health and environmental impact on the surrounding community? And will we be just fine without it?	Potential visual impacts were described in sections 3.10 and 4.10 of the Draft EIS. Potential impacts to public health and safety were considered in sections 3.16 and 4.16 of the Draft EIS. County and city authorizations, such as Conditional Use Permits, were described in chapter 2 of the Draft EIS.
239	46	46.2		Hamel	19-VIS	We would have every sunrise, sunset, and moonrise ruined by these 170ft poles on the proposed routes.	The potential visual impact of the proposed towers was stated and acknowledged in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS. Visual simulations were also included in appendix K of the Draft EIS. Based on feedback from the public and cooperating agencies, new simulations have been included in the Final EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
267	49	49.18	Cascabel Working Group	Meader	19-VIS	Tumamoc Hill. While the routing of the upgraded line around Tumamoc Hill in Tucson will be on the margins of the property rather than direction across it, the impact will still be significant, especially visually. This remains a concern. The project should work directly and closely with Tumamoc Hill personnel to further minimize and reduce impacts in any way possible.	As discussed in section 5.4 of the Draft EIS, BLM and Western conducted several Tumamoc Hill outreach meetings and Section 106 meetings in Tucson, Arizona. Alternatives in the EIS (TH1 and TH3) were developed as a result of this outreach, and the Agency Preferred Alternative in the EIS was designed, in consultation with stakeholders, to go around rather than through Tumamoc Hill. Additional vantage points from within and around Tumamoc Hill are presented in the EIS (see sections 3.10 and 4.10 and appendix K).
283	58	58.3	National Park Service	Trenchik/Montano	19-VIS	Visual Resources Ch 3 (3.10.2) –page 374, line 31. Federal lands Include federal lands with viewsheds that may be affected by the project, even if the project doesn't cross their property. For example "In addition, the project may affect the viewsheds of protected federal lands mandated to provide visitor/recreational experiences in undisturbed natural areas, including national parklands (Saguaro National Park) and wilderness areas."	This information was stated and acknowledged in section 3.10 of the Draft EIS.
291	60	60.6		Wood	19-VIS	Lastly, The eyesore the new higher poles will be	The potential visual impact of the proposed towers was stated and acknowledged in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS.
337	68	68.14	Pima County	Bernal/Connolly	19-VIS	visual impacts, especially where the alignments are near or within residential areas and natural preserves	The potential visual impacts of upgrading the existing towers with taller monopoles, including potential impacts on residential areas and natural preserves, were discussed in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS. As noted in chapters 1 and 2 of the Draft EIS, the existing Western line has been in place since 1951.
351	68	68.28	Pima County	Bernal/Connolly	19-VIS	Impacts on Viewsheds (Scenic Quality) "Additional changes to scenic quality would occur from the introduction of upgraded transmission structures, including monopole and lattice-type structures along the existing transmission line. There are 2.4 miles of Subroute 4.1 which cross Class B scenery (5 percent of the Subroute), and 46.0 miles which cross Class C scenery (95 percent of the Subroute). Impacts from those changes to scenic quality in Class B and C would be minor to moderate (Draft EIS, Volume 2, Page 891)." Brief descriptions of the referenced scenic quality Classes and the methodology applied in determining 'minor to moderate' impacts would have been helpful, given the stretches of land impacted. Simulated views in Figures B-34, 50, 66, 68, 72, 78, and 90 reveal the significant height difference of the transmission line poles and lattice structures. The impacts on scenic quality could be considered 'low' or 'moderate' from a great distance but not at distances from which the referenced figures were photographed.	Descriptions of the scenic quality and sensitivity along subroute 4.1 (and all alternative subroutes) were included in section 3.10 of the Draft EIS. Sections 3.10 and 4.10 in the EIS have been revised to include descriptions of the referenced scenic quality classes and clarify methodology. As noted, visual simulations in appendix K of the Draft EIS were developed to disclose the potential visual changes that would occur if the existing Western line is upgraded. Additionally, based on feedback from the public and cooperating agencies, new simulations have been included in the Final EIS. Tower height was also a consideration in the visual resources analysis.
375	68	68.52	Pima County	Bernal/Connolly	19-VIS	p. 428, Chapter 3, in the discussion of visual effects, Tumamoc Hill is considered a "Class A" resource, an important cultural and visual resource.	The importance of Tumamoc Hill has been acknowledged by BLM and Western since early in the process. As discussed in section 5.4 of the Draft EIS, BLM and Western conducted several Tumamoc Hill outreach meetings and webinars in Tucson, Arizona. Alternatives in the Draft EIS (TH1 and TH3) were developed as a result of this outreach, and the Agency Preferred Alternative in the Draft EIS was designed, in consultation with stakeholders, to go around rather than through Tumamoc Hill. The potential visual and cultural impacts of the proposed Project, including potential impacts to Tumamoc Hill, were described in sections 4.11 and 4.9 of the Draft EIS, respectively.
434	68	68.111	Pima County	Bernal/Connolly	19-VIS	One of the primary concerns identified by Development Services in previous comments was visual impacts. The photo simulations now provided help to clarify the mass and appearance of the smaller preferred monopoles and provide some impression of impacts on a few representative viewsheds.	The comment accurately reflects the analysis provided in sections 3.10 and 4.10 and appendix K of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
452	72	72.5	Mountain View Ranch		19-VIS	In connection with the foregoing, the California Public Utilities Commission ("CPUC") recently applied the concept of "overburdening" in a proceeding involving Southern California Edison Company "SCE"). In its Decision No. 13-07-018, issued July 16, 2013, the CPUC granted the Petition of the City of Chino Hills ("Chino Hills") for Modification of Decision No. 09-12-044. In the earlier decision, the CPUC had authorized SCE to construct a double-circuit 500 kV transmission line on towers 195-198 feet tall in a 150' right-of-way already occupied by SCE electric transmission facilities. In that regard, SCE's existing facilities 1 were to be removed from the aforesaid right-of-way; and, in fact, some of the removal of existing facilities and construction of new facilities had already occurred in the Chino Hills' area as of the time the CPUC reconsidered its earlier decision. On further consideration, the CPUC concurred with Chino Hills' argument that the previously authorized replacement facilities would have a "significant and unavoidable impact" on the residential viewscape in question, and particularly those who lived along the right-of-way. In addition, the CPUC proved to be sympathetic to Chino Hills' argument that the visual impact in question would unfairly impose on the affected residents of Chino Hills "too large a burden for the new transmission infrastructure that is being installed to benefit all Californians." Further, the CPUC concluded that the transmission supporting structure, which would "dwarf ' adjacent homes did not comport with the community values of Chino Hills and affected residents. Moreover, the CPUC recognized that the previously approved facilities could result in a diminution in property values and a reduction in local tax revenues to the detriment of affected residents and Chino Hills itself. footnote#1: The existing facilities were a 220 kV line, which had been erected in the 1940s on 75' lattice towers.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western would acquire additional land rights in accordance with Federal law for those easements determined to be insufficient. The potential visual impacts of the Upgrade Section of the proposed Project are analyzed in sections 3.10 and 4.10 of the Draft EIS.
456	72	72.8	Mountain View Ranch		19-VIS	As Currently Proposed, the "Upgrade" Portion of The Project Would Have a Substantial Adverse Impacts on Mountain View and Other Nearby Residential Subdivisions. I . Visual Impact. At page 890, lines I 3-14, the DEIS states as follows: "Visual contrast in the Upgrade Section would result from the introduction of taller transmission structures. Visual contrast to the Upgrade Section was determined to be low to moderate" [emphasis added]	The comment accurately reflects the analysis provided in sections 3.10 and 4.10 and appendix K of the Draft EIS. Section 4.10 of the Final EIS has been revised to acknowledge that while impacts are anticipated to be low to moderate and not significant at a landscape level, individual perspectives on the visual impact of the proposed Project may be different.
457	72	72.9	Mountain View Ranch		19-VIS	Further, at page 1096, lines 24-29, the DEIS states that "Other past and present actions in the CEAA have converted larger portions of the Upgrade Section analysis area to residential, commercial, and industrial development associated largely with the city of Tucson and surrounding lands. Because the proposed Upgrade Section would be located along existing transmission corridors, visual effects are likely to blend in with existing development and associated visual impacts and not substantially contribute to cumulative effects in concert with these other developments." [emphasis added] However, (i) the "comparison of typical existing and proposed structure types" depicted in Figure 2-12 to the DEIS indicates that the physical contrast between the existing 115 kV single circuit "H" frame structure and the proposed 230 kV double-circuit monopole structure is quite dramatic, with the latter physically and visually overwhelming or "dwarfing" the former.4 Further, the photographs set forth at Figure B-59 (KOP 43-04) of the DEIS effectively refute the above-quoted suggestions that (i) "visual effects are likely to blend in with existing development and associated visual impacts," and (ii) the visual contrast with existing residential development will be "low to moderate."5 With all due respect to the preparers of the DEIS, these observations and conclusions are simply incorrect with respect to that portion of Mountain View located south of Interstate 10 and the residential subdivisions located immediately to its west and south of Interstate 10. Physical Impact. In the Executive Summary portion of the DEIS, the following statements appear m connection with a discussion of the Project's right-of-way requirements: "The anticipated ROW width for the Upgrade Section 230-kV transmission line is 150 feet. . . In certain areas of the Upgrade Section, development and constraints may not allow for the expansion of the existing 100-foot ROW." [DEIS Executive Summary, page xvii, lines 5-1O] footnotes: 4 A copy of Figure 2-12 is attached hereto as Appendix "E." 5 A copy of Figure B-59 (KOP U3-04) is attached herto as Appendix "F." In that regard, the Sonoita Ranch housing development depicted in those photographs, is sim ilar to and near Mountain View.	The comment accurately reflects the analysis provided in sections 3.10 and 4.10 and appendix K of the Draft EIS. Section 4.10 of the Final EIS has been revised to acknowledge that while impacts are anticipated to be low to moderate and not significant at a landscape level, individual perspectives on the visual impact of the proposed Project may be different.
474	74	74.4	U.S. Forest Service	White	19-VIS	I will reiterate what I submitted earlier here, and some may benefit national historic trails as well as the Continental Divide Trail: Although the transmission line will cross the trail on existing utility corridors (under the preferred alternative), the difference in scale of the structures will be noticeable, and the length of time trail users are under transmission lines and exposed to the noise and foreground visual impacts will be longer. Therefore all possible mitigation measures should be implemented to minimize experiential and visual impacts, such as installing towers that oxidize to a natural patina, and spacing towers for maximum possible distance from the trail and/ or matching structure spans.	These are Project design features considered in table 2-7 in the Draft EIS (now table 2-8 in the Final EIS), and accurately reflect the analysis provided in section 4.10 of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
475	74	74.5	U.S. Forest Service	White	19-VIS	Weather conditions and time of day can make a huge difference in the visual impact of these structures. I drove I-10 recently into a storm that made the backdrop very dark, with sunlight from the west illuminating all the existing transmission lines that parallel the freeway. They appeared as a veritable forest of white towers against the dark sky.	Sections 3.10 and 4.10 of the EIS have been revised to include a description of how light conditions (as affected by weather) can affect scenic quality.
504	76	76.24	Arizona State Land Department	Ojeda	19-VIS	Generally speaking, the existing conditions appear to have been based on existing VRI data. Please clarify whether the VRI data covered all lands within the project area, including state lands. If so, please explain whether or not there was also a project-level analysis of existing conditions throughout the project corridors, and the methodology and results of that analysis.	Section 3.10 of the EIS has been revised to provide clarity on the VRI data used in the analysis.
506	76	76.26	Arizona State Land Department	Ojeda	19-VIS	Considering the total length of all of the alternatives, more KOP/simulations may be warranted to fully illustrate the potential impacts to the resource.	As discussed in section 3.10.2 of the Draft EIS, KOPs considered in the analysis were identified based on comments from the public during scoping, as well as using feedback from cooperating agencies. The KOPs and simulations considered in appendices I and K of the Draft EIS are sufficient for the analysis as they are illustrative of all landscape types, alternatives routes, and transmission tower structure options. The EIS has been revised to include additional simulations (see appendix K) based on public and agency comments.
639	82	82.58	SunZia	Wray	19-VIS	Section 3.10.1, page 373 – This section states multiple widths for the visual study area. Given that all alternatives should be consistently studied regardless of jurisdiction, we request the analysis use one study area that would result in a consistent affected environment and environmental consequence section.	All alternatives analyzed in detail are considered equally in the Draft and Final EISs. The rationale for the difference in the analysis area between the New Build Section and Upgrade Section is described in sections 3.10 and 4.10 of the Draft EIS and is based on the appropriate level of analysis, in keeping with BLM methods for evaluation.
640	82	82.59	SunZia	Wray	19-VIS	Key Observation Points (“KOPs”) are used for compliance or to document typical impacts to viewers. Landscape or scenic-quality impacts are based on changes to the landscape regardless of where the landscape is viewed from. The BLM needs to understand these changes to keep their Visual Resource Inventory (“VRI”) updated; also, scenic-quality impacts are used to make determinations regarding the preferred route regardless of jurisdiction. This distance of 10–18 miles for the viewshed seems arbitrary and is not consistent with the distances associated with the visual study areas. Using such a vast distance implies that there would be impacts to views 10 to 18 miles away. Even if there were views at such a distance, the dominance and contrast would be low to non-existent. Distance or Influence zones from other similar and permitted (i.e., already vetted) 345 kV or 500 kV projects should be used as the benchmark for effects analysis. The viewshed should be conducted in a manner that is consistent with the study area for visual resources.	Section 4.10.2 of the Draft EIS stated, “The methodology used for the impact analysis of the visual resources is three-tiered. The first level of analysis is a discussion of the changes to the landscape in the areas of analysis resulting from the actions prescribed under each alternative. The second level of analysis is an assessment of impacts resulting from those same actions as seen from KOPs along the potential project routes. The third level of analysis is an assessment of whether the proposed changes to the landscape would meet BLM’s objectives for management of visual resources where the potential project routes crossed BLM-managed lands.” The viewshed in the Draft EIS was delineated out to 10 miles, not 18 miles, which is consistent with recent research on visibility of transmission facilities in western landscapes by Argonne National Laboratory (ANL). Methods used for the visual resource analysis (see sections 3.10 and 4.10 in the Draft EIS), including KOP selection, are based on BLM visual resource methodology. Using other projects as a benchmark for the effects analysis may not be appropriate for a project of this scale, within this geography, and in addition is typically not a vetted process for BLM visual resource management studies.
641	82	82.60	SunZia	Wray	19-VIS	Section 3.10.8, page 376 – The area of exposure, i.e., 10 miles on either side of the centerline, does not seem to correlate with the analysis area set forth in section 3.10.1. This inconsistency in methodology makes this section confusing, as the study area for determining visual impacts seems to be based on several distances without criteria associated with the project description.	The area of exposure used in the Draft EIS (see section 3.10) is based on BLM VRM guidance as well as viewshed mapping to ensure that the analysis is comprehensive. The viewshed in the Draft EIS was delineated out to 10 miles, not 18 miles, which is consistent with recent research on visibility of transmission facilities in western landscapes by ANL. Clarification of the viewshed buffer is included in the EIS (see sections 3.10 and 4.10).
642	82	82.61	SunZia	Wray	19-VIS	Further, this viewshed implies that wherever the project can be seen in these zones, impacts may occur; otherwise why else would a viewshed be conducted in terms of a visual analysis? Areas of visual effect and distance zones should be reconciled based on actual potential effects of the project description (i.e., towers, ancillary facilities, and access roads) and described as such.	The viewshed analysis, as described in sections 3.10 and 4.10 in the Draft EIS, is conducted to establish the boundary of the area of potential effects (APE). The APE does not constitute impact, but simply defines the boundary within which impacts are determined and analyzed.
643	82	82.62	SunZia	Wray	19-VIS	Sections 3.10.7–3.10.15, page 376 – The inventory section provides what is included in the inventory, but does not explicitly state what the methods are based on (i.e., BLM methods, other 345 kV projects, Project Description, etc.).	Sections 3.10 and 4.10 (Visual Resources) in the EIS have been revised to clarify methodology. Section 3.10.7 of the EIS has been revised to reference the BLM guidance, and section 4.10.2 of the EIS specifically discusses methodology and assumptions.
644	82	82.63	SunZia	Wray	19-VIS	New terms and concepts that are cited but have not been defined to this point in the Draft EIS should be defined.	Sections 3.10 and 4.10 (Visual Resources) in the Draft EIS do not introduce new terms needing specific definitions for clarity.
645	82	82.64	SunZia	Wray	19-VIS	Studies for visual resources should be replicable, but this section does not seem to provide a holistic approach based on the goals of the NEPA and federal guidance regarding visual resource analysis. Please explain the methodology used and how it complies with federal guidance on visual resource analysis.	Sections 3.10 and 4.10 (Visual Resources) in the EIS have been revised to clarify that the analysis was conducted in keeping with BLM VRM methodology and regulatory compliance.
646	82	82.65	SunZia	Wray	19-VIS	The analysis states that the criteria to establish the area of exposure and viewshed are based on transmission line spans of 1,000 feet. Although this is important in defining areas of effect for visual resources, other components are just as important, including typical height of tower(s), width of access roads, and other temporary and permanent ancillary features. We request that these metrics be used in this analysis in order to better predict the Southline Project’s visual impacts.	Sections 3.10 and 4.10 (Visual Resources) in the EIS have been revised to clarify that the analysis was conducted in keeping with BLM VRM methodology and regulatory compliance.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
647	82	82.66	SunZia	Wray	19-VIS	Additionally, using the terms for “area of exposure” versus “viewshed” does not define what the affected environment should be for visual resources. NEPA language should be used so the visual resource inventory, and later, impact analysis, is consistent with other resources studies in this Draft EIS. While using the area of exposure to help define and identify KOPs for the project is appropriate, we request that other criteria be used as well, most specifically, the BLM’s 10 environmental factors for assessing contrast as well as specific criteria as identified in the Visual Resource Management (“VRM”) Manual 8431.	Sections 3.10 and 4.10 (Visual Resources) in the EIS have been revised to clarify that the analysis was conducted in keeping with BLM VRM methodology and regulatory compliance.
648	82	82.67	SunZia	Wray	19-VIS	Additionally, KOPs should be identified not just where the project may be seen (i.e., area of exposure), but where sensitive landscapes (i.e., scenic quality units) or sensitive viewers are located. We request the Draft EIS disclose where impacts are, in addition to resources that would not be impacted.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. As stated in section 3.10.11 of the Draft EIS, “Selection of KOPs occurred within the proposed area of public exposure and relates to locations of visually sensitive publics or visually sensitive locations.”
649	82	82.68	SunZia	Wray	19-VIS	The KOP analysis should include KOPs regardless of whether they are exposed to the transmission line or not.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology.
650	82	82.69	SunZia	Wray	19-VIS	Section 3.10, pages 372–386 – The methodology seems to be a hybrid of the BLM inventory system for planning-level decisions. VRI concepts such as scenic quality, sensitivity level rating units (“SLRUs”), and distance zones are being used to inventory all land for the project, which may not be appropriate for the detailed project level inventory. While the BLM VRI should be used to provide context from a planning perspective and potential plan amendments, the scale of the VRI is not appropriate for a linear ROW project such as Southline. For example, the scenic quality rating units (“SQRUs”) are too large to assess effects to scenic quality based on the relatively narrow size of the project ROW. In this regard, where appropriate, we request that the Draft EIS use project-level data to define the affected environment.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. The assessment of visual contrast was based on the BLM’s 10 environmental factors, as described on page 867 of the Draft EIS. The analysis of impacts to scenic quality was described at the Project level for each alternative subroute in chapter 4 of the Draft EIS.
651	82	82.70	SunZia	Wray	19-VIS	Also, the methodology discussion seems to mix planning-level elements with project-level elements, making the inventory section hard to understand and reducing the defensibility of the project. For example, the maps associated with this section depict distance zones prepared from the centerline for the project using 0–5 miles and 5–15 miles. These distance zones are being depicted as VRI, however, the BLM’s distance zones are developed from sensitive viewing locations, not a specific project. Therefore, when a KOP is described within the 0–5 mile distance zone, this may not be accurate based on the BLM’s VRI. This analysis needs to be updated to be project specific.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology.
652	82	82.71	SunZia	Wray	19-VIS	Also, the maps within this chapter do not illustrate the SQRUs crossed by the project which is important for context.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Maps to support the analysis in section 3.10 of the EIS include scenic quality rating units crossed by the project.
653	82	82.72	SunZia	Wray	19-VIS	In regard to the items above, we request that a set of maps should be included in this section that clearly depict the BLM’s VRI including SQRUs, SLRUs, distance zones, and Visual Resource Inventory Classes.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Maps to support the analysis in section 3.10 of the EIS include BLM VRI information.
654	82	82.73	SunZia	Wray	19-VIS	USFS data should be mapped where the project would affect USFS lands.	Maps to support the analysis in sections 3.10 and 4.10 of the EIS have been revised to include more detailed geographic context and to support the analysis.
655	82	82.74	SunZia	Wray	19-VIS	In addition to these planning-level maps and information, project-level information should be mapped including viewshed, KOPs and the visual-sensitive land uses that KOPs were derived from, and project-level scenic quality units, as appropriate.	Maps and data presented in the Draft EIS included viewshed, KOPs, visual sensitive lands, and scenic quality rating units.
656	82	82.75	SunZia	Wray	19-VIS	KOP information, without the underlying land use, is ambiguous and does not provide the context to understand the affected environment and KOP selection.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Sections 3.10 and 4.10 of the EIS have been revised to consider land use in terms of the visual resources.
657	82	82.76	SunZia	Wray	19-VIS	Section 3.10.10, pages 33–37 – The relationship between concern level and BLM SLRUs is not evident and is hard to follow and needs to be modified to correct this issue. Concern levels seem to be associated with sensitive receptors, while SLRUs are associated with concern for the landscape, not a viewer’s viewshed. This inconsistency creates confusion and implies that if a residence (or other high concern viewer) happens to fall within a low BLM SLRU, the occupant’s concern for change would be low (or at least lower). A viewer’s sensitivity (or concern) for changes in the landscape remains the same no matter what BLM VRI unit it falls within, compared to existing conditions.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Sensitivity level is not solely derived from the existing RMPs, but rather from a combination of existing “planning level” designation, combined with “project level” determination.
658	82	82.77	SunZia	Wray	19-VIS	Contrast resulting from the project may change, but sensitivity or concern remains the same. The Draft EIS should describe what the SLRU data, as well as the sensitive receptor data (i.e., concern level), means in terms of inventory and potential impacts.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology.
659	82	82.78	SunZia	Wray	19-VIS	Section 3.10 – Deming Valley SLRU has residential viewers defined as being of moderate sensitivity. Residential viewers should have a high sensitivity regardless of the planning level SLRU. The analysis should be corrected by identifying and disclosing the impacts to these residential viewers.	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Section 4.10 of the EIS has been revised to include a clear description of sensitivity from residences.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
660	82	82.79	SunZia	Wray	19-VIS	Planning level SLRU should be separated explicitly from viewing receptor concern level	Methods used in the Draft EIS (see sections 3.10 and 4.10) for the visual resource analysis are based on BLM visual resource methodology. Sections 3.10 and 4.10 in the EIS have been revised to discuss planning level sensitivity level rating unit separately. Impacts to specific receptors associated with each alternative subroute were described in section 4.10.3 of the Draft EIS.
661	82	82.80	SunZia	Wray	19-VIS	Section 4.10.1, pages 866–867 – The Draft EIS states, “impacts based on existing condition.” Impacts for visual resources are looking at the change on the landscape and on viewers’ viewshed, in context with the landscape character for scenic quality and concern level for viewers. Contrast is merely a measurement of change in the landscape, but the other context of the resources being evaluated is what the impacts are based on.	The section quoted in the Draft EIS states that impacts are based on the change to the existing conditions. Section 4.10 of the Draft EIS provides sufficient clarification of both contrast and impacts in keeping with BLM guidance on VRM and NEPA.
662	82	82.81	SunZia	Wray	19-VIS	Section 4.10.2, page 866 – Similar to the comment above, contrast is a measurement of change. Impact is landscape change or contrast (witnessed or inherent landscape features) in conjunction with the context of sensitive resources. Contrast by itself does not constitute an impact. For example, a high-contrast condition may occur within 100 feet of a house. However, due to topography in the area, the high contrast may not be visible, and therefore impacts to the residential viewers would be nominal. However, if the SQRU is in a pristine state for the location in which the project is proposed, but it is a C-class landscape, impacts may only be low/moderate-to-moderate. If that landscape is designated as an A-class landscape, then impacts on scenic quality may be high.	The section quoted defines that impacts are based on the change to the existing conditions. Sections 3.10 and 4.10 of the EIS have been revised to clarify how impacts described in terms of contrast are in keeping with BLM guidance on VRM and NEPA.
663	82	82.82	SunZia	Wray	19-VIS	Section 4.10.2, page 866 – The term “impact” should be taken out of compliance methods and narratives and compliance with a VRM Class should only be based on contrast. There would be impacts to viewers and impacts to scenery but compliance is purely an administrative function to manage the landscape and inform the public of the level of mitigation being imposed.	The term “impact” in section 4.10 of the Draft EIS is used appropriately.
664	82	82.83	SunZia	Wray	19-VIS	Section 4.10.2, page 868 – This section states that there are two kinds of viewers: common and sensitive. Based on the text, sensitive viewers are defined as views from residences. “Common Views”, a new term introduced thus far, should be defined.	The term “common views” in section 4.10 of the Draft EIS is considered understandable to the reader as used in this context.
665	82	82.84	SunZia	Wray	19-VIS	Please explain why if a view is designated as “common”, then why would it be considered a KOP.	Viewer sensitivity is also considered in the analysis as discussed in the Draft EIS (see section 4.10). In this case, common landscape is in a location where many viewers would be exposed to change.
666	82	82.85	SunZia	Wray	19-VIS	Visual Contrast Rating (“VCR”) forms should be used to demonstrate compliance with BLM VRM Classes (VRM HB 8431).	The VCR forms are included in appendix J, and information is presented within the analysis in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS.
667	82	82.86	SunZia	Wray	19-VIS	How are impacts to viewers and scenic quality defined? Please revise the text to provide an explanation.	Sections 3.10 and 4.10 of the EIS have been revised to clarify the terms “viewers” and “scenic quality,” as appropriate.
668	82	82.87	SunZia	Wray	19-VIS	Section 4.10.2, page 868 – The visual elements associated with “highly rural” to “high density urban landscape” are not described; please define. The two aforementioned terms are land-use definitions, and not standard visual resource-related definitions.	Terms used to describe community composition are used in sections 3.10 and 4.10 (Visual Resources) of the EIS. These terms are descriptors intended to articulate population characteristics within the area and are not technical descriptors based solely on visual resources.
669	82	82.88	SunZia	Wray	19-VIS	Section 4.10.2, page 869 – Earlier in the affected environment section, the analysis area was based on whether the line was new or the line would be upgraded. This resulted in two study areas with varying boundaries. However, line 7 states that a 10-mile buffer was analyzed around all project elements. This is inconsistent with the text in the affected environment section and implies a different inventory area, as compared to the impact area. We request that the inventory area be consistent across all alternatives studied and all land ownership jurisdictions.	All alternatives analyzed in detail were considered equally in the Draft and Final EIS. The rationale for the difference in the analysis area between the New Build Section and Upgrade Section is described in sections 3.10 and 4.10 of the Draft EIS and has been clarified in section 3.10.9 of the EIS.
670	82	82.89	SunZia	Wray	19-VIS	Section 4.10.2, page 869 – We request that the criteria be expressly defined, otherwise terminology is arbitrary (i.e., highly sensitive, aesthetic importance, and miles of project visibility). These criteria make it appear as though impacts were evaluated against them, but they are not identified in the affected environment section.	The criteria established and implemented in the visual resources analysis are based upon and in keeping with BLM Manual 8400 series.
671	82	82.90	SunZia	Wray	19-VIS	Does the project with high contrast that is seen for several miles constitute a significant impact? How will this be measured using KOPs?	In the Draft EIS, the usage of “high” impacts or contrast is in keeping with BLM VRM guidance and specifically pertains to visual resources, whereas the usage of “significant” has a different connotation within the reporting.
672	82	82.91	SunZia	Wray	19-VIS	High impacts and significant impacts are similar. The difference between high and significant impacts is not clear and requires clarification.	In the Draft EIS, the usage of “high” impacts or contrast is in keeping with BLM VRM guidance and specifically pertains to visual resources, whereas the usage of “significant” has a different connotation within the reporting.
673	82	82.92	SunZia	Wray	19-VIS	Section 4.10.2 – Results – Mitigation planning is absent from the Draft EIS discussion of impacts. Without a discussion on mitigation planning the public cannot understand how impacts would be minimized or avoided.	In the Draft EIS, the potential impacts of the proposed Project on the cultural, physical, and human environment, along with a description of mitigation measures and other measures proposed to reduce potential impacts, have been considered in the EIS. Mitigation measures are included in the EIS (see section 2.4.6).
674	82	82.93	SunZia	Wray	19-VIS	Initial versus residual impacts are not discussed, please include an explanation or such a discussion.	Residual impacts are also discussed in chapter 4.10 of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
675	82	82.94	SunZia	Wray	19-VIS	How will miles of mitigation be compared across all alternatives?	Mitigation is not based entirely on Project length (miles), but rather on minimizing potential impacts where they are expected occur. BLM and Western will work with landowners to carefully micro-site the Project, as appropriate. Mitigation measures for all resources are included in the EIS (see section 2.4.6).
676	82	82.95	SunZia	Wray	19-VIS	Impact results are largely deficient, in regard to describing what the impact will be from a visual standpoint. Most impacts are only defined as high, moderate, or low, but the Draft EIS does not explain if the impact is due to access roads, puller-tensioner sites, laydown areas, a transmission tower, or all of the components of the Southline Project; please correlate the level of impact to the project component that is causing the impact.	Section 4.10 (Visual Resources) in the EIS has been revised to better clarify the potential impacts of the proposed Project in terms of impacts to the existing environment from the introduction of the proposed Project. In addition, each visual contrast rating sheet includes a “proposed activity description” (see appendix I of the EIS).
677	82	82.96	SunZia	Wray	19-VIS	We request that this section be revised to provide a full explanation of the visual impacts to viewers and the landscape, what mitigation is applied, and how the mitigation would reduce the impact.	Sections 3.10 and 4.10 of the EIS have been revised to better clarify the potential impacts of the proposed transmission line on the cultural, physical, and human environment, including visual resources (sections 3.10 and 4.10). Mitigation measures for all resources are included in the EIS (see section 2.4.6).
678	82	82.97	SunZia	Wray	19-VIS	For areas where the Southline Project would not comply with VRM classes, we request that the Draft EIS explain what KOP has views of the VRM class and which VCR sheet documents the non-compliance.	Descriptions of compliance with VRM designations are included for each alternative under consideration in section 4.10 of the Draft EIS. The complete set of visual contrast rating sheets in appendix I includes a description of compliance/non-compliance for each KOP. Sections 3.10 and 4.10 (Visual Resources) in the EIS have been revised based on this comment.
679	82	82.98	SunZia	Wray	19-VIS	The mitigation documented on the VCR sheet should be discussed in the body of the Draft EIS.	Mitigation in the visual contrast rating sheets was included in the body of the Draft EIS. Sections 3.10 and 4.10 of the EIS have been revised to better clarify the potential impacts of the proposed transmission line in terms of visual resources (sections 3.10 and 4.10). Mitigation measures from the visual contrast rating sheets have been included in table 2-8 of the EIS and are considered in the impact analysis.
680	82	82.99	SunZia	Wray	19-VIS	We recommend that the Draft EIS be supplemented to address the confusing nature of how these impacts were evaluated by actually disclosing impacts and the rationale for the conclusions reached. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on this important resource section.	Please note that the EIS reflects consideration of all comments received during the public comment period. The EIS includes responses to comments received during the public comment process and provides revised EIS text based on those comments. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
682	82	82.101	SunZia	Wray	19-VIS	Section 3.13, page 493 – The text states that opportunities for solitude and/or primitive recreation are based on hearing a project or seeing a project or other man-made structures/disturbance. Given this, the visual resource assessment should include views from wilderness character units to ascertain opportunities preserved or lost for solitude and/or primitive recreation.	The “visual influence” is captured during the wilderness characteristics inventory under the “naturalness” assessment. While visual influence is considered, it is not the basis of the wilderness character. There are many wilderness areas (designated) from which one can see transmission lines, but those instances are not in and of themselves characteristics that negate a wilderness designation, or the potential for wilderness characteristics. In the Draft EIS, see sections 3.12 and 4.12 for a discussion of special designations (designated wilderness areas) and sections 3.13 and 4.13 for the wilderness characteristics inventory.
1	1	1.1	–	Hitchcock	7-LAND	It looks as though the route this line will follow is the I-10 route, but I am not quite sure if that is correct? If it is correct, does it jeopardize in any way the electromagnetic free area that Ft Huachuca and its surrounding electronic ranges contain? If it does, MOVE IT FARTHER NORTH around any close contact with Sierra Vista, Ft Huachuca or its electronic ranges. Run it from Wilcox straight west to Tucson! It would be truly inconsiderate to put financial decisions over the protection of our Nation.	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. BLM and Western have coordinated closely with the DOD, Ft. Huachuca, and BSETR to minimize impacts to the BSETR mission and to select the Agency Preferred Alternative. These potential impacts are described in sections 3.11.3 and 4.11.3 of the EIS.
28	11	11	–	Howell	7-LAND	1. How do you deal with leakage from lines or electrical appliances, tv, ratio, etc. 2. How is livestock affected? Also humans?	Information on the potential effects of electromagnetic fields from the proposed transmission line was described in sections 3.16 and 4.16 of the Draft EIS. Section 4.11.2 of the EIS has been revised to consider how EMF may affect livestock.
64	25	25.2	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-11 (Subroute 1), page 151. Local Alternative Segments DN1 -- needs the following bullet added: "-Crosses MTR VR-263"	Table 2-11 (now table 2-15 in chapter 2 of the EIS) has been revised based on this comment.
65	25	25.3	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-11 (Subroute 1), page 151. Local Alternative Segments D -- needs the following bullet added: "-Crosses MTR VR-263"	Table 2-11 (now table 2-15 in chapter 2 of the EIS) has been revised based on this comment.
66	25	25.4	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Subroute 2.1 - Proponent Preferred -- needs the following corrections: first MTR bullet should be changed to read, "- Crosses military training routes (MTRs) VR-259, VR-260, VR-263, and VR-1233"; second MTR bullet, "- Crosses MTRs VR-260 and VR-267" should be deleted. (VR-267 is not crossed by the project.)	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
67	25	25.5	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Subroute 2.2 - Proponent Alternative -- needs the following corrections: MTR bullet should be changed to read, "- Crosses MTRs VR-259 and VR-260". (VR-267 is not crossed by the project.)	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
68	25	25.6	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Local Alternative Segments LD3a -- needs the following bullet corrected to read: "- Crosses MTRs VR-263 and VR-1233"	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
69	25	25.7	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Local Alternative Segments LD3b -- needs the following bullet deleted: "-Crosses MTR VR-1233"	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
70	25	25.8	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Local Alternative Segments LD4 -- needs the following bullet added: "- Crosses MTRs VR-260, VR-263, and VR-1233"	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
71	25	25.9	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Local Alternative Segments LD4-Option 5 -- needs the following bullet added: "- Crosses MTRs VR-260, VR-263, and VR-1233"	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
72	25	25.10	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-12 (Subroute 2), page 162. Local Alternative Segments WC1 -- needs the following bullet added: "-Crosses MTR VR-259"	Table 2-12 (now table 2-16 in chapter 2 of the EIS) has been revised based on this comment.
73	25	25.11	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Table 2-13 (Subroute 3), page 172. Subroute 3.1 - Proponent Preferred (Upgrade) -- needs the following bullet added: "- Crosses military training route (MTR) VR-259"	Table 2-13 (now table 2-17 in chapter 2 of the EIS) has been revised based on this comment.
74	25	25.12	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Chapter 3, contents, page Xlvii, lines 24-25. The following figures need to be inserted into the list: "Figure 3.11-4. Military Training Routes and Airspace Restrictions in the New Build Section ……. 463" and "Figure 3.11-5. Military Training Routes and Airspace Restrictions in the Upgrade Section..... 464"	The table of contents in the EIS has been revised based on this comment.
75	25	25.13	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 466, line 43. The following sentences should be inserted here: "...miles left and right of the route. Nautical miles have been converted to statute miles for the purposes of this analysis. FAA Sectional charts only display the MTR centerline, not the actual MTR leg widths. See figure 3.11-4 and 3.11-5 for actual route points and leg widths. MTRs are subdivided into Instrument MTRs, Visual MTRs, and Slow-..."	Section 3.11.3 in the EIS has been revised based on this comment.
76	25	25.14	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 467, lines 12-14. The following sentence is confusing and inaccurate since page 461, lines 25- 27 includes MTRs in the analysis area. It should be deleted: "Although airspace restrictions are present in the vicinity of the proposed Project and alternatives, the military analysis area does not overlap with these areas."	Section 3.11.3 in the EIS has been revised based on this comment.
77	25	25.15	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Sections 3.11.3 and 4.11.3, Military Operations, page 467, Tables 3.11-14.; 3.11-15; 3.11-16; 3.11-17; 4.11-16; and 4.11-17. Two things. First, this table and other tables included below inaccurately display the "Length of Analysis Area Crossed by MTR". For example. look at Table 3.11-14, Proposed Route – P2, VR-263, with a value of “0.05” miles. That equals only 264 feet. I believe the original calculations may have only accounted for just the (very thin) MTR centerline and not the actual width of affected MTR legs. Secondly, some of the subroutes are mis-labeled and are shown in the wrong Route Groups. The following changes should be made, as listed below.	Sections 3.11.3 and 4.11.3 in the EIS have been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
78	25	25.16	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 467, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The P2-subroute 1.1 segment crosses 19.3 miles of VR-263, not 0.05 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
79	25	25.17	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 467, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The P4a-subroute 1.1 segment crosses 8.7 miles of VR-263, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
80	25	25.18	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 467, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. In accordance with Table 2-8, p. 86, the "P4b-subroute 1.1" is actually in Group 2, not Group 1, and should be labeled "subroute 2.1", not 1.1. Also, the P4b-subroute 2.1 segment crosses 11.4 miles of VR-263, not zero miles. The P4b-subroute 2.1 segment also crosses 8.4 miles of VR-1233, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
81	25	25.19	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. In accordance with Table 2-8, p. 86, the "P6b-subroute 1.1" is actually in Group 2, not Group 1, and should be labeled "subroute 2.1", not 1.1. Also, the P6b-subroute 2.1 segment crosses 5.9 miles of VR-260, not 0.04 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
82	25	25.20	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section . In accordance with Table 2-8, p. 86, the "P7-subroute 1.1" is actually in Group 2, not Group 1, and should be labeled "subroute 2.1", not 1.1. Also, the P7-subroute 2.1 segment crosses 6.6 miles of VR-259, not 0.05 miles. The P7-subroute 2.1 segment also crosses 13.4 miles of VR-260, not 0.47 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
83	25	25.21	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. In accordance with Table 2-8, p. 86, the "P8-subroute 1.1" is actually in Group 2, not Group 1, and should be labeled "subroute 2.1", not 1.1. Also, the P8-subroute 2.1 segment crosses 0.5 miles of VR-259, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
84	25	25.22	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative DN1 segment crosses 6.8 miles of VR-263, not 0.05 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
85	25	25.23	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative D segment crosses 7.3 miles of VR-263, not zero miles.	Section 3.11 in the EIS has been revised based on this comment.
86	25	25.24	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The S7 - subroute 1.2 segment crosses 34.1 miles of VR-263, not 0.05 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
87	25	25.25	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The S8 -subroute 1.2 segment crosses 14.6 miles of VR-263, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
88	25	25.26	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The F -subroute 2.2 segment crosses 5.9 miles of VR-260, not 0.04 miles.	Section 3.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
89	25	25.27	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative LD3a segment crosses 19.9 miles of VR-263, not zero miles. The Local Alternative LD3a segment also crosses 22.3 miles of VR-1233, not 0.09 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
90	25	25.28	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative LD4 segment crosses 5.5 miles of VR-260, not 0.04 miles. There is a typo with the first listed VR-1233 which should be changed to "VR-263" with a height AGL of "100" feet, not 300 feet; and which the Local Alternative LD4 segment crosses "44.6" miles of VR-263, not 0.06 miles. The second listed VR-1233 should remain listed, but the Local Alternative LD4 segment crosses 35.5 miles of VR-1233, not 0.05 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
91	25	25.29	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative LD4-Option 5 segment is missing from this table and should be included with the following MTR crossing data: LD4-Option 5 crosses VR-260 with its height AGL of 300 feet a total of 5.1 miles. It also crosses VR-263 with its height AGL of 100 feet at total of 3.0 miles. It also crosses VR-1233 with its height AGL of 300 feet a total of 4.9 miles.	Section 3.11.3 in the EIS has been revised based on this comment.
92	25	25.30	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The Local Alternative WC1 segment crosses 1.3 miles of VR-259, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
93	25	25.31	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. The three Substations all cross about 0.27 miles of the correctly listed MTRs, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
94	25	25.32	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 468, Table 3.11-14. MTRs that Cross the Analysis Area - New Build Section. I could not verify the accuracy of the data regarding the listed staging areas, because I could not find the proposed locations of the staging areas within the DEIS. Also, I found that both this table and Table 3.11-16 seem to list a lot of the same designated staging areas, even though the two tables probably should list only the ones affecting the respective New Build and Upgrade sections. For example, why is staging area Gb listed on the New Build table, when Gb is only in the Upgrade section?	Section 3.11.3 in the EIS has been revised based on this comment.
95	25	25.33	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 469, Table 3.11-15. Military Operations Areas in the Vicinity of the New Build Section. If you consider that Tombstone C MOA starts at 14,500 feet AMSL, then this airspace would probably not be affected by the Southline Transmission project. On the other hand, Tombstone A and Tombstone B MOAs both start at 500 feet AGL and possible affects must be more closely examined. Perhaps, the distance to the nearest route (segment name) should be changed as follows: "Tombstone MOAs (A and B) -- 3.2 miles (S7) -- 0"	Section 3.11.3 in the EIS has been revised based on this comment.
96	25	25.34	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 469, line 11-15. The sentence phrase " The Army National Guard trains helicopter pilots near the Tortolita Substation. Military training flights occur between 1,000" should be removed and the rest of these lines clarified and corrected to read as follows: "The Jackal Low MOA overlies Graham County in southwestern Arizona. The lowest altitude of operation is 100 feet AGL and the highest is 10,999 feet above mean sea level (amsl). The Jackal Low MOA is always active Monday through Friday from 7 a.m. to 6 p.m.. It is active by Notice to Airmen (NOTAM) 6 p.m. to 10 p.m. Monday to Friday and intermittently on weekends."	Section 3.11.3 in the EIS has been revised based on this comment.
97	25	25.35	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 470, Table 3.11-16. MTRs that Cross the Analysis Area - Upgrade Section. In accordance with Table 2-8, p. 87, the "Ga - subroute 2.2" is actually in Group 2, not Group 3. Also, the Ga segment crosses 1.3 miles of VR-259, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.
98	25	25.36	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 470, Table 3.11-16. MTRs that Cross the Analysis Area - Upgrade Section. In accordance with Table 2-8, p. 87, the "Gb - subroute 2.2" is actually in Group 2, not Group 3. Also, the Gb segment crosses 1.0 miles of VR-259, not zero miles.	Section 3.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
99	25	25.37	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 470, Table 3.11-16. MTRs that Cross the Analysis Area - Upgrade Section. In accordance with Table 2-8, p. 87, the "Gc - subroute 2.2" is actually in Group 2, not Group 3. Also, the Gc segment crosses 7.4 miles of VR-259, not 0.07 miles. The Gc segment does not cross VR-1233 at all. All three typos (though different crossing distances?) referring to VR-1233 should be deleted.	Section 3.11.3 in the EIS has been revised based on this comment.
100	25	25.38	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 470, Table 3.11-16. MTRs that Cross the Analysis Area - Upgrade Section. I could not verify the accuracy of the data regarding the listed staging areas, because I could not find the proposed locations of the staging areas within the DEIS. Also, I found that both this table and Table 3.11-14 seem to list a lot of the same designated staging areas, even though the two tables probably should list only the ones affecting the respective New Build and Upgrade sections.	Section 3.11.3 in the EIS has been revised based on this comment.
101	25	25.39	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 470, line 14. If you consider that Tombstone C MOA starts at 14,500 feet AMSL, then this airspace would probably not be affected by the Southline Transmission project. On the other hand, Tombstone A and Tombstone B MOAs both start at 500 feet AGL and possible affects must be more closely examined. Perhaps the distance to the nearest route (segment name) should be changed as follows: "Tombstone A MOA -- 12.7 miles (U1a) -- 0"	Section 3.11.3 in the EIS has been revised based on this comment.
102	25	25.40	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 3.11.3, Military Operations, page 476, line 8-16. Numerous typographical errors here; namely, should be Arizona Air National Guard, not Army National Guard; seven MOAs, not five; three low- level MTRs, not one. The entire paragraph should be replaced with this one: "The 162nd Wing of the Arizona Air National Guard is located at the Tucson International Airport in Tucson. The 162nd Wing is the largest Air National Guard wing in the United States with three fighter squadrons, a reconnaissance group, and the Air National Guard/Air Force Reserve Test Center. The mission of the 162nd Wing of the Arizona Air National Guard is to provide fighter training programs and tactical reconnaissance. The 162nd Wing provides F-16 training for pilots through academic, simulator, and flight training. The 162nd Wing has scheduling responsibility and operational control of the Special Use Airspace for seven MOAs (including the Outlaw, Jackal, and Jackal Low MOAs located north of Tucson, the Morenci and Reserve MOAs located northeast of Tucson, and the Ruby and Fuzzy MOAs located south of Tucson), three low-level MTRs and one Air-to-Air Refueling Anchor. The 162nd Wing also regularly uses the Goldwater Range Complex and the Sells MOA."	Section 3.11.3 in the EIS has been revised based on this comment.
103	25	25.41	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, line 4. Should be changed to read as follows: "Segment P2 and P4a of Subroute 1.1 would cross MTR VR-263 …"	Section 4.11.3 in the EIS has been revised based on this comment.
104	25	25.42	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, line 7. Should be changed to read as follows: "Segment P2 and P4a of Subroute 1.1 would cross MTR VR-263. …"	Section 4.11.3 in the EIS has been revised based on this comment.
105	25	25.43	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Militaary Operations, page 939, line 9. Typos should be fixed to read as follows: " … would be required at MTR VR-263 in order to prevent impacts to MTR VR-263. No other military installations…"	Section 4.11.3 in the EIS has been revised based on this comment.
106	25	25.44	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The P2 segment actually crosses 19.3 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
107	25	25.45	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The P4a segment actually crosses 8.7 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
108	25	25.46	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The S7 segment actually crosses 34.1 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
109	25	25.47	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The S8 segment actually crosses 14.6 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
110	25	25.48	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The DN1 segment actually crosses 6.8 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
111	25	25.49	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 939, Table 4.11-16. Route Group 1 Military Uses Resource Inventory Data. The D segment actually crosses 7.3 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
112	25	25.50	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 3. Should be changed to read as follows: "MTR VR-263 would be crossed by segment S7 and S8 of Subroute 1.2. Construction … "	Section 4.11.3 in the EIS has been revised based on this comment.
113	25	25.51	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 6. Should be changed to read as follows: "MTR VR-263 would be crossed by segment S7 and S8 of Subroute 1.2. At the intersection … "	Section 4.11.3 in the EIS has been revised based on this comment.
114	25	25.52	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 9. Should be changed to read as follows: "… VR-263. Unmitigated, segment S7 and S8 would result in moderate impacts to MTR VR-263 due to the potential …"	Section 4.11.3 in the EIS has been revised based on this comment.
115	25	25.53	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 17-18. Should be changed to read as follows: "Local alternatives A, B, and C do not intersect with any military facilities or MTR VRs. However, local alternatives DN1 and D would cross MTR VR-263. Construction impacts would be as described above ..."	Section 4.11.3 in the EIS has been revised based on this comment.
116	25	25.54	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 21-23. Should be changed to read as follows: "Local alternatives A, B, and C do not intersect with any military facilities or MTR VRs. However, local alternatives DN1 and D would cross MTR VR-263. At the intersections of local alternatives DN1 and D with MTR VR-263, the minimum flight altitude is 100 feet AGL. ... "	Section 4.11.3 in the EIS has been revised based on this comment.
117	25	25.55	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 25. Should be changed to read as follows: "… Unmitigated, DN-1 and D would result in moderate impacts to MTR VR-263 due to the potential for …"	Section 4.11.3 in the EIS has been revised based on this comment.
118	25	25.56	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 940, line 31-32. Should be changed to read as follows: "Segment P7 of Subroute 2.1 would cross the Willcox Playa, which is managed by the BSETR and is a possible site for test operations. Segments P4b, P6b, P7, and P8 would cross MTRs VR-259, VR-260, VR-263, and VR-1233 (Table 4.11-17). Construction ... "	Section 4.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
119	25	25.57	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, line 4-6. Should be changed to read as follows: "… the BSETR. Where subroute 2.1 intersects with MTR VR-259 (segments P7 and P8), VR-260 (segments P6b and P7), and VR-1233 (segment P4b), the minimum flight altitudes are 700 feet AGL (VR-259) and 300 feet AGL (VR-260, VR-1233), respectively. This is well above the proposed structure height of 90 to 170 feet, as described in section 2.4.2. On the other hand, wherever subroute 2.1 (segment P4b) intersects with MTR VR-263, the minimum flight altitude is 100 feet AGL. Therefore, the optional structure height of 90 feet (as described in section 2.4.2) would be required at MTR VR-263 in order to prevent impacts to MTR VR-263. Unmitigated, segment P4b would result in moderate impacts to MRT VR-263 due to the potential for airspace limitations at 100 feet AGL. Impacts for operation and maintenance ..."	Section 4.11.3 in the EIS has been revised based on this comment. BLM and Western will work with the Arizona Air National Guard (Tucson) during Project micro-siting.
120	25	25.58	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The P4b segment actually crosses 14.0 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
121	25	25.59	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The P6b segment actually crosses 5.9 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
122	25	25.60	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The P7 segment actually crosses 13.4 miles of MTR VRs, not 0.5 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
123	25	25.61	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The P8 segment actually crosses 0.5 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
124	25	25.62	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The F segment actually crosses 5.9 miles of MTR VRs, not zero miles. Also its foonote "* Value greater than zero but less than 0.1" should be deleted.	Section 4.11.3 in the EIS has been revised based on this comment.
125	25	25.63	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The Ga segment actually crosses 1.3 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
126	25	25.64	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The Gb segment actually crosses 1.0 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
127	25	25.65	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The Gc segment actually crosses 7.4 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
128	25	25.66	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The LD3a segment actually crosses 26.8 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
129	25	25.67	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The LD4 segment actually crosses 51.5 miles of MTR VRs, not 0.1 miles.	Section 4.11.3 in the EIS has been revised based on this comment.
130	25	25.68	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The LD4-Option 5 segment actually crosses 5.1 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
131	25	25.69	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The WC1 segment actually crosses 1.3 miles of MTR VRs, not zero miles.	Section 4.11.3 in the EIS has been revised based on this comment.
132	25	25.70	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 941, Table 4.11-17. Route Group 2 Military Uses Resource Inventory Data. The footnote "* Value greater than zero but less than 0.1" should be deleted.	Section 4.11.3 in the EIS has been revised based on this comment.
133	25	25.71	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 942, line 3-7. For consistency delete: "These would result in minor impacts for subroute 2.2 as it 4 would occur below the MTRs, which are used for aerial training, electronics, and communications testing." Then change the remaining lines to read as follows: "Temporary ground disturbance would occur during construction activities where segments F, Ga, Gb and Gc would cross MTRs VR-259 and VR-260. Construction impacts would be as described above in "Impacts Common to All Action Alternatives."	Section 4.11.3 in the EIS has been revised based on this comment.
134	25	25.72	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 942, line 9. Should be changed to read as follows: "Segments F, Ga, Gb and GC of Subroute 2.2 would cross MTRs VR-259 and VR-260. Where VR-259 would…"	Section 4.11.3 in the EIS has been revised based on this comment.
135	25	25.73	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 942, line 18-19. Should be completely reworded as follows: "Local alternatives LD3a, LD4, LD4-Option 5, and WC1 intersect one or more of the following MTRs: VR-259, VR-260, VR-263, and VR-1233. LD3a intersects both VR-263 and VR-1233. Both LD4 and LD4-Option 5 intersect VR-260, VR-263, and VR-1233. LD4 would also intersect with the Morenci MOA. WC1 intersects only VR-259. Construction impacts would be as described above in "Impacts Common to All Action Alternatives."	Section 4.11.3 in the EIS has been revised based on this comment.
136	25	25.74	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 942, line 22-24. Should be completely reworded as follows: "Local alternatives LD3a, LD4, LD4-Option 5, and WC1 intersect one or more of the following MTRs: VR-259, VR-260, VR-263, and VR-1233. LD3a intersects both VR-263 and VR-1233. Both LD4 and LD4-Option 5 intersect VR-260, VR-263, and VR-1233. WC1 intersects only VR-259. Where LD3a, LD4, LD4-Option 5, and WC1 do not intersect with VR-263, but only intersect with VR-259, VR-260, and/or VR-1233, the minimum flight altitudes are 700 feet AGL (VR-259)and 300 feet AGL (VR-260, VR-1233), respectively. This is well above the proposed structure height of 90 to 170 feet, as described in section 2.4.2. On the other hand, wherever LD3a, LD4, and LD4-Option 5 intersect with MTR VR-263, the minimum flight altitude is 100 feet AGL. Therefore, the optional structure height of 90 feet (as described in section 2.4.2) would be required at MTR VR-263 in order to prevent impacts to MTR VR-263. Unmitigated, segments LD3a, LD4, and LD-Option 5 would result in moderate impacts to MRT VR-263 due to the potential for airspace limitations at 100 feet AGL. LD4 would also cross the Morenci MOA. The Morenci MOA occurs at ... "	Section 4.11.3 in the EIS has been revised based on this comment.
137	25	25.75	Arizona Air National Guard (Tucson) 162nd Wing Airspace Manager	Stine	7-LAND	Section 4.11.3, Military Operations, page 946, line 8-10. Should be completely reworded as follows: "Use the optional structure height of 90 feet in areas intersecting the MTR VR-263, which has a 100 feet AGL flight altitude. Additionally, do not erect any structures exceeding 200 feet in height in areas intersecting MTRs VR-260 and VR-1233. Towers crossing the MTRs should also have anti-collision lighting to the maximum extent possible in order to make the hazard of powerlines more apparent to pilots flying low altitude at night. These measures would mitigate impacts to military training and airspace usage, as well as contribute to the safe conduct of our missions."	Section 4.11.3 in the EIS has been revised based on this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
329	68	68.6	Pima County	Bernal/Connolly	7-LAND	Typical of County regulatory authorities and infrastructure concerns with such projects, permits will be required for air quality control and right-of-way intrusions, and any potential conflicts with wastewater conveyance systems must be avoided. Furthermore, as per the Pima County Zoning Code, §18.07.040(8)(5), there are permitting requirements and design standards for power substations with an input voltage of 115 kV or greater. We understand the new substations are not proposed to be constructed; however, the expansion of existing substations, depending upon the extent of such expansions, may require modification of existing approvals, including the Board of Supervisors' modification of an existing substation permit.	Compliance with Pima County permitting requirements is discussed in sections 3.11.1 and 4.11.1 of the Draft EIS.
169	32	32.15	EPA	Jansky/Weeks	7-LAND	Farmlands. Chapter 4; page 935. The Agency Preferred Alternative will have adverse impacts to Farmland of Statewide Importance, Farmland of Unique Importance, and Prime Farmland. The impacts are not designated as significant by BLM because they do not comprise greater than 10% loss of prime or unique farmlands. Regardless of the 10% significance level established by BLM, any impacts to prime or unique farmlands require consultation with the National Resource Conservation Service (NRCS). Recommendation: The FEIS should have consultation documents between BLM and NRCS for prime and unique farmlands. The documents should indicate if the impacts to prime farmland soils are below de minimus levels and require no further consultation, or that further consultation and mitigation of impacts in necessary.	BLM coordinated with the NRCS regarding potential impacts to prime and unique farmlands; this coordination is available in the Project Record and referenced in section 4.11.2 of the EIS.
180	36	36.2	Hearing	No ID Speaker	7-LAND	I didn't see an overlay on the map in Doña County for the unmanned vehicle area for the university. Has that been considered?	BLM and Western received comments from NMSU's Unmanned Aircraft Systems Flight Test Center. As a result, sections 3.11.1 and 4.11.1 (Land Use) of the EIS have been revised to include information on the Unmanned Aircraft Systems Flight Test Center.
186	38	38.3	Hearing	No ID Speaker	7-LAND	How is that going to impact our airport (referring to the Benson Airport)	The potential impact of the proposed transmission line on transportation was analyzed in section 4.18 of the Draft EIS. The Benson Municipal Airport is located more than 1 mile from the nearest proposed Project route and would not be affected by the proposed Project.
227	42	42.1	U.S. International Boundary and Water Commission	Anaya	7-LAND	Portions of the Proponent (Proposed Upgrade) Alternative are located near the United States/Mexico international boundary and may require further consultation with the USIBWC. Projects located on or near the international boundary which may affect international boundary monuments or drainage flows into either country must be reviewed by the USIBWC. The USIBWC has a duty to access, maintain, and utilize the international boundary monuments along the United States/Mexico land boundary. The USIBWC is charged with these duties through treaties and international agreements between the United States and Mexico. We require that the proposed work, and related facilities not affect the permanence (disturb the foundations) of existing boundary monuments nor impede access for their maintenance. In addition, any proposed construction must allow for line-of-sight visibility between each of the boundary monuments.	Sections 2.4.6, 3.7 (Water Resources), and 3.11.1 (Land Use) in chapter 3 of the EIS have been revised to describe requirements of the U.S. International Boundary and Water Commission.
269	51	51.1	City of Benson	Brooks	7-LAND	I am very concerned about the 60 cycle noise emitted by this line in the San Pedro Valley. Fort Huachuca Intelligence gathering was chosen because of the lack of electronic noise emissions in the United States. Although the Forts listening bands world wide are in the KHz / MHz / and GHz bands there is magnetics and harmonics transmitted by the large electro magnetic fields put out by this line. Has studies been done to show this line in no way would effect the extremely sensitive and important intelligence gathering operations by the world listening antenna's of Fort Huachuca. I hope you have consulted with them on this.	BLM and Western have coordinated closely with the DOD, Ft. Huachuca, and BSETR to minimize potential impacts to the BSETR mission; the Agency Preferred Alternative also considers this coordination. These potential impacts were described in sections 3.11.3 and 4.11.3 of the Draft EIS. As discussed in section 2.9.1 of the Draft EIS, upgrading the existing Western line in the same location would keep the location of potential interference in an area that the military is already accounting for in its operations.
308	65	65.1	Department of Defense	Brashier	7-LAND	No additional comments were received from DoD. As we discussed at the Cooperating Agency meeting, the comments submitted by DoD in the previous round included detailed comments from LtCol David Stine, AZANG, 162 FW Airspace Manager, OSS/OSOA/162 OG Chief of Wing Scheduling, OSS/OSOS. These comments had been approved by the Clearinghouse and service headquarters, but were not incorporated into the draft by BLM. LtCol Stine has worked directly with your team and sent an email to BLM with the attached comments.	Sections 3.11.3 and 4.11.3 in the EIS have been revised to address LtCol David Stine's comments.
235.2	68	68.2	Pima County	Bernal/Connolly	7-LAND	Chief among our concerns is that the 'Rebuild' alignment crosses through or is adjacent to several County-owned preserves, including Cienega Creek Natural Preserve, Bar V Ranch, Tucson Mountain Park, Tumamoc Hill and Los Morteros;	Sections 3.11.1 and 4.11.1 (Land Use) in the EIS have been revised to include more information on county-owned preserves. However, it is worth noting that the existing Western line, ROW, and access points have been in existence since the lines were constructed in 1951, prior to the designation of the county-owned preserves.
332	68	68.9	Pima County	Bernal/Connolly	7-LAND	increased illegal access to and use of County-owned and leased properties that have been preserved for purposes of conservation and resource protection;	Sections 3.11.1 and 4.11.1 in the EIS have been revised based on this comment. However, it is worth noting that the existing Western line, ROW, and access points have been in existence since the lines were constructed in 1951, prior to the designation of the county-owned preserves.
340	68	68.17	Pima County	Bernal/Connolly	7-LAND	That segment of the preferred route that crosses through T15S,R14E, Section 31 and parts of Section 32 (Exhibit A) is an impediment to completing undertakings which are critically important to the region's economic health and affects the Federal Aviation Authority's (FAA) and the U.S. Air Force's federal interests.	Based on comments by Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. Additionally, U3aPC is part of the revised Agency Preferred Alternative in the EIS, as described in section 2.10.5 of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
346	68	68.23	Pima County	Bernal/Connolly	7-LAND	This route has 13 segments, U3b through U4, that stretch roughly 48.4 miles of which, 29.8 miles are on private land, 17.9 miles on State-owned land, and the remainder on County and Bureau of Reclamation lands (Draft EIS, Volume 2, Table 4.11-7, Page 919). Along the stretch of these segments, five "land types" have been identified (Draft EIS, Volume 2, Table 4.11-14, Page 933): (1) Total Representative ROW Acreage; (2) Farmland of Statewide Importance (FSI); (3) Farmland of Unique Importance (FUI); (4) Prime Farmland if Irrigated (PFI); and (5) Prime Farmland if Meeting Other Conditions (PFOC). It is not clear as to how these "land types" have attained their categorization, as a glossary of terms to define them does not exist as part of the draft EIS. The draft EIS determines 874.9 acres of land within "Total Representative ROW Acreage" (Draft EIS, Volume 2, Table 4.11-14, Page 933) with 25.1 acres of FUI, the latter amounting to approximately three percent of the former. It is not empirically conclusive that lands categorized under FSI, FUI, PFI, and PFOC are subsets of TRRA, as PFOC lands in Segment U3h, exceed TRRA lands by over 100 acres.	Sections 3.11.2 and 4.11.2 in the EIS have been revised based on this comment.
347	68	68.24	Pima County	Bernal/Connolly	7-LAND	The Draft EIS states that "[T]he construction of the transmission line would result in a minor direct effect by eliminating farmland from production, if it cannot be avoided" (Draft EIS, Volume 2, Page 932). An empirical explanation of this conclusion from BLM and other project proponents is essential for the County to review and either agree or disagree. Also, while it is good to know that "[A]dditional efforts to avoid farmlands would be available during completion of the final design," some mention of these stated efforts, earlier than the 'final design' stage is greatly desired in order for Pima County to assess their potential validity and effectiveness. Also, while stating that "[N]o direct or indirect effects of rangelands are expected to occur during the Project operation," such can be reassuring only with the provision of verifiable data.	Sections 3.11.2 and 4.11.2 in the EIS have been revised to clarify potential impacts to farmlands and range lands and the basis for the potential impacts.
348	68	68.25	Pima County	Bernal/Connolly	7-LAND	This route has 10 segments, MA1 through TH3b (Draft EIS, Volume 2, Table 4.11-7, Page 920), and raises very similar issues and concerns as those mentioned in "Proponent Preferred Route (Subroute 4.1)" above. Such as, the absence of empirical data when stating that "[O]nly three of the local alternatives – TH3a, TH3b, and TH3-Option C – would result in minor direct effects to Farmlands of Unique Importance." Also, inadequate explanation when stating that "[M]inimal acres of rangeland in the ROW would be directly affected by the construction of the transmission line under any of these local alternatives" is not convincing, especially, without a 'glossary of terms' to define 'minimal' or 'minor direct effects', among other terms.	Sections 3.11.2 and 4.11.2 in the EIS have been revised based on this comment.
376	68	68.53	Pima County	Bernal/Connolly	7-LAND	p. 441, Chapter 3, lines 8-22: a brief discussion of the Pima County Comprehensive Plan refers to a "supplement" regarding environmental planning, calling it the "2012 SDCP." The document is not further named, and only briefly described in terms of environmental planning. This refers to the 2012 issuance of the Multi-species Conservation Plan, an integral part of the Sonoran Desert Conservation Plan. The discussion should correctly recognize the documents it cites in the DEIS and correctly place the MSCP in the appropriate context of the SDCP.With reference to other local planning documents discussed in the DEIS, it is worth noting that both the City of Tucson and Pima County are developing new comprehensive plans that will be in effect most likely before the proposed Southline project goes to construction, if it is approved. The discussion should refer to the up-to-date planning documents and Southline should be certain that the transmission line plans meet the requirements and the intent of these new planning documents.	Sections 3.11.2 and 4.11.2 in the EIS have been revised based on this comment.
377	68	68.54	Pima County	Bernal/Connolly	7-LAND	p. 451, Chapter 3, Land Ownership, lines 4-20: This discussion incorrectly identifies the acreage in Pima County ownership that is intersected by Southline Transmission Line. The DEIS lists only the Cienega Creek Natural Preserve; does not list Empirita Ranch, Valencia Site, or Tumamoc Hill. Table 3.11-6 incorrectly reports the acreage. The discussion and table should be corrected.	Section 3.11.1 and table 3.11-6, as well as section 4.11.1, in the EIS have been revised based on this comment.
378	68	68.55	Pima County	Bernal/Connolly	7-LAND	p. 487, Chapter 3, lines 30-33 incorrectly list land management at Tumamoc Hill as, "Pima County and Arizona College of Science". The management listing needs to be corrected.	Section 3.12 in the EIS has been revised based on this comment.
449	72	72.1	Mountain View Ranch		7-LAND	The Plat for development of Mountain View was approved by the Board of Supervisors of Pima County, Arizona, on October 17, 2000; and, marketing and development of Mountain View has since been in progress. In that regard, Lots 1-132 of Mountain View are located directly adjacent to the south side of Interstate 10 and just east of State Highway 83; and, Lots 133-362 are located on the north side of Interstate 10. Mountain View is located in picturesque rolling Arizona-Sonora Desert terrain, with spectacular views of surrounding mountain ranges, as the name of the subdivision correctly suggests. In that regard, attached as Appendix "A" are copies of photographs taken by one of the principals of Developer/Investor on or about July 3, 2014 which illustrate (i) the view shed from various lots in Mountain View, and (ii) the viewshed from Sonoita Ranch, a single-family residential community immediately to the west of State Highway 83. Attached as Appendix "B" is a copy of the approved Plat map for Mountain View, which identifies the location of Lots 1- 132 in relation to Interstate 10 and State Highway 83.	As discussed in section 1.1 of the Draft EIS, the existing Western line was constructed in 1951; thus, the line and ROW predate the Mountain View Ranch Subdivision by more than 50 years. Planned residential development projects, such as the Mountain View Residential Development, are considered in section 4.21 in terms of the cumulative effects of the proposed Project.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
450	72	72.2	Mountain View Ranch		7-LAND	Based upon Developer/Investor's review of the March 2014 Draft Environmental Impact Statement/Draft Resource Management Plan Amendment (collectively "DEIS") for the Southline Transmission Line Project ("Project"), it appears that both the Project Proponents' Preferred Route and the Agency's Preferred Alternative Route contemplate use of the Western Area Power Administration's ("WAPA") existing transmission system easement which transects that portion of Mountain View located south of Interstate 10, a few miles west of the Pantano Substation. The easement in question is 100' feet width, and it transects portions of Lots 8, 9, 10, 11, 12, 27,28, 30, 33, 36, 39, 40, 41, 42, 43, 92, 95, 96, 104, 105, 106, 107 and 113 in the part of Mountain View located south of Interstate 10. Thus, and as discussed in Section II below, the Project would have direct and substantial adverse impacts upon current and future residents of Mountain View, prospective purchasers of homes in Mountain View and Developer/Investor.	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. As described in chapter 2 of the Draft EIS, the proposed Project (Proponent Preferred, and Agency Preferred Alternative) includes use of Western's existing ROW. As discussed in section 1.1 of the Draft EIS, the existing Western line was constructed in 1951; thus, the line and ROW predate the Mountain View Ranch Subdivision by more than 50 years. Planned residential development projects, such as the Mountain View Residential Development, are considered in section 4.21 in the Draft EIS in terms of the cumulative effects of the proposed Project.
485	76	76.5	Arizona State Land Department	Ojeda	7-LAND	Generally speaking, it appears that the DEIS does not discuss remnant parcels as an issue of concern.	Sections 3.11.1 and 4.11.1 in the EIS have been revised to include information regarding remnant parcels.
492	76	76.12	Arizona State Land Department	Ojeda	7-LAND	Generally speaking the construction/upgrade of new access roads may create opportunities for unauthorized OHV use, which could adversely affect State Trust Land. This indirect and cumulative effect should be addressed in detail.	Sections 3.11.1 and 4.11.1 in the EIS have been revised based on this comment.
493	76	76.13	Arizona State Land Department	Ojeda	7-LAND	Generally speaking it is unclear if the proposed alignment and ultimate location of associated roads, substations, and pole locations…take into consideration the creation of remnant parcels (location, size, shape or other characteristics of a parcel relative to its future economic value.	Sections 3.11.1 and 4.11.1 in the EIS have been revised to include information regarding remnant parcels.
508	76	76.28	Arizona State Land Department	Ojeda	7-LAND	Please update this section to include impacts to (acreage) ASLD Agricultural and Range land uses.	Sections 3.11.1 and 4.11.1 in the EIS have been revised based on this comment.
510	76	76.30	Arizona State Land Department	Ojeda	7-LAND	Please provide information regarding ASLD's Marana, Rincon Posta Que Mada, Marana and Houghton Road Corridor Conceptual Plans (background to be emailed seperately) and reference ARS 37-331.03 (conceptual planning). Please contact Tim Bolton, in the Southern Arizona Office for further information.	Sections 3.11.1 and 4.11.1 in the EIS have been revised based on this comment.
610	82	82.29	SunZia	Wray	7-LAND	Also, existing substations would be expanded along the path of the Upgrade Section and within the Tucson metropolitan area, apparently requiring significant, although undisclosed levels of impact to surrounding land uses. The Southline Draft EIS is not complete until these impacts are fully analyzed and fully disclosed to the public.	Sections 3.11.1 and 4.11.1 in the EIS have been revised to clarify how potential impacts to surrounding land uses have been considered, including the proposed expansion of existing substations. Additional detail on the location and type of expansions at the existing substations has been included in section 2.4.2 of the EIS. As discussed in the Draft EIS, impacts to land use are not considered significant.
611	82	82.30	SunZia	Wray	7-LAND	This is especially critical for the 30 single-family residences in the Drexel subdivision that are likely to be impacted by Southline's ROW requirements. We request the Draft EIS be supplemented to correct this deficiency by significantly expanding the disclosure of likely effects from these expansions.	Sections 3.11.1 and 4.11.1 in the EIS have been revised to clarify how potential impacts to surrounding land uses have been considered, including residential development along Western's existing ROW. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
634	82	82.53	SunZia	Wray	7-LAND	Section 3.11 Land Use (Affected Environment) oversimplifies existing land uses by grouping development categories (e.g., Developed, low-intensity; Developed, medium- intensity; Developed, high-intensity) in terms of gross acreages for the New Build Section and the Upgrade Section without any further detailed descriptions.	Section 3.11.1 of the EIS has been revised to clarify how development categories were derived.
635	82	82.54	SunZia	Wray	7-LAND	This oversimplification is carried forward in Section 4.11 Land Use (Environmental Consequences) – Impacts Common to All Alternatives, which describes potential impacts to all development categories as being minor and temporary. The assignment of minor impacts does not appear substantiated, given that the Upgrade Section requires a new 150-foot wide ROW overlapping a distance of 25 feet of the existing ROW, and is routed through the historic Tumamoc Hill area, Tohono O'odham tribal lands, Tucson Mountain Park, and residential areas in Tucson where condemnation of multiple residential properties would be necessary, albeit such impacts are not disclosed in this Draft EIS.	As described in section 2.4.3 in the Draft EIS, only an additional 50 feet of ROW would be required, not an additional 150 feet. This section of the EIS has been revised for added clarity. As further clarified in chapter 2 of the Final EIS, no new ROW is anticipated between the Del Bac and Rattlesnake substations. Section 4.11.1 of the EIS has been revised to clarify how development categories were derived and how impacts were characterized.
707	82	82.126	SunZia	Wray	7-LAND	Land Use: Section 3.11 Land Use (Affected Environment) oversimplifies existing land uses by grouping development categories (e.g., Developed, low-intensity; Developed, medium-intensity; Developed, high-intensity) in terms of gross acreages for the New Build Section and the Upgrade	Section 3.11.1 of the EIS has been revised to clarify how development categories were derived.
708	82	82.127	SunZia	Wray	7-LAND	Section without any further detailed descriptions. This oversimplification is carried forward in Section 4.11 Land Use (Environmental Consequences) –Impacts Common to All Alternatives, which describes potential impacts to all development categories as being minor and temporary.	As described in section 2.4.3 in the Draft EIS, only an additional 50 feet of ROW would be required, not an additional 150 feet. This section of the EIS has been revised for added clarity. As further clarified in chapter 2 of the Final EIS, no new ROW is anticipated between the Del Bac and Rattlesnake substations. Section 4.11.1 of the EIS has been revised to clarify how development categories were derived and how impacts were characterized.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
709	82	82.128	SunZia	Wray	7-LAND	The assignment of minor impacts is unsubstantiated, given that the Upgrade Section requires a 150 foot right-of-way overlapping a distance of 25 feet of the existing right-of-way, and is routed through the historic Tumamoc Hill area, Tohono O'odham tribal lands, Tucson Mountain Park, and residential areas in Tucson where condemnation of multiple residential properties would be necessary. We request that these impacts be properly disclosed in a supplemental Draft EIS so that the public can be made aware of such possibilities. The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Sections 3.11.1 and 4.11.1 in the EIS have been revised to clarify how potential impacts to surrounding land uses have been considered, including impacts to Tumamoc Hill, Tohono O'odham Nation lands, Tucson Mountain Park, and residential areas in urban Tucson. As described in section 2.4.3 in the Draft EIS, only an additional 50 feet of ROW would be required, not an additional 150 feet. And in some cases, such as between Del Bac and Rattlesnake substations, the additional 50 feet would not be obtained. This section of the EIS has been revised for added clarity. Section 4.11.1 of the EIS has been revised to clarify how development categories were derived and how impacts were characterized. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
729	82	82.148	SunZia	Wray	7-LAND	The following comments, although resource specific to Land Use and Environmental Justice, are exemplary of the inadequate detail provided by all 20 resource reports, which the Draft EIS heavily relied upon to evaluate and disclose environmental impacts. These comments are cursory in nature as our requests for an extension to the comment period were denied. Detailed comments on the remaining resource reports are not provided in this letter due to time constraints. However it is apparent that the level of detail to support an informed and reasoned analysis regarding the context and intensity of impacts is inadequate in most of the resource reports.	The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS.
730	82	82.149	SunZia	Wray	7-LAND	Southline Transmission Project Resource Report 7: Land Use. The land use report was reviewed to ascertain the level of detail that was used to determine and disclose impacts that could result from the construction and operation of the Southline Project as reported in the Draft EIS. Although more detailed maps were included in the resource report, which allows a reviewer to better understand locational information regarding the alignment of the proposed study corridor and representative right-of-way, the level of detail is still inadequate and appears to be a cursory desktop review relying on National Land Cover Database ("NLCD") GIS data.	The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS.
731	82	82.150	SunZia	Wray	7-LAND	It does not appear that any field survey work was conducted, or that efforts were made to confirm that the data provided a meaningful tool for understanding and identifying potential impacts.	The comment accurately reflects the analysis provided in sections 3.11 and 4.11; no field visits were made to field validate data; however, the best available data were used for the Draft EIS.
732	82	82.151	SunZia	Wray	7-LAND	Although, the NLCD is the most ubiquitous information available on a landscape scale, it is most useful for landscape scale policy and planning. It lacks the sufficient site specific information to evaluate context and intensity of localized impacts that could result from the Southline Project. The NLCD should have been accompanied by field verification of real property that could potentially be affected by the Southline Project.	No field visits were made to field validate data; however, the best available data were used for the Draft EIS.
733	82	82.152	SunZia	Wray	7-LAND	Furthermore, Section 7.2.1 of the Land Use Resource Report identifies the area of analysis for the Upgrade Section as 150 feet wide. This is misleading as it is inconsistent with the total right-of-way impact in the Upgrade Section, which requires an additional 125-foot right-of-way to allow for the construction of a new double- circuit 230 kV line to mitigate the removal of Western's existing 115 kV line.	The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS. As described in section 2.4.3 in the Draft EIS, only an additional 50 feet of ROW would be required, not an additional 150 feet. In some cases, such as between Del Bac and Rattlesnake substations, the additional 50 feet would not be obtained. This section of the EIS has been revised for added clarity.
520	76	76.40	Arizona State Land Department	Ojeda	7-LAND	Vol 1 of 4, Page 457, Line 18-21; The DEIS states, "Both the NMSLO and the ASLD indicated that additional information might be available by researching hard-copy office files or conducting field trips to confirm the status of range improvement projects. These efforts have not been undertaken." Please contact ASLD Natural Resources Division to verify that this statement is still accurate.	Additional coordination with NMSLO and ASLD was completed as a result of this comment and information included in section 4.11.2 of the EIS.
16	8	8.1		Anderson	12-SD	Is there any conflict overlap with proposed Organ Mountain/Desert Peaks Monument Proposal	At the time of the publication of the Draft EIS, the Organ Mountains–Desert Peaks National Monument was proposed for designation and analyzed as a reasonably foreseeable action in section 4.20. Sections 3.12 and 4.12 of the EIS have been revised and now reflect designation of the Organ Mountain–Desert Peaks National Monument by presidential proclamation on May 21, 2014. The Agency Preferred Alternative in the EIS would not be located within the National Monument.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
18	8	8.3		Anderson	12-SD	I note that the Proponent Alternative from Wilcox AZ to Afton NM: 1. Lies along the border, probably close enough to fall outside of the proposed Morgan Mountain/Desert Peaks Monument area, except for the northward jog to the (existing) Afton Substation.	At the time of the publication of the Draft EIS, the Organ Mountains–Desert Peaks National Monument was proposed for designation and analyzed as a reasonably foreseeable action in section 4.20. Sections 3.12 and 4.12 of the EIS have been revised and now reflect designation of the Organ Mountain–Desert Peaks National Monument by presidential proclamation on May 21, 2014. The Agency Preferred Alternative in the EIS would not be located within the National Monument.
281	58	58.1	National Park Service	Trenchik	12-SD	The NPS supports the Department of the Interior's efforts to be "smart from the start" in permitting renewable energy projects and related transmission infrastructure. The NPS encourages the Bureau of Land Management (BLM) to make every effort to ensure that transmission lines are constructed and operated in an environmentally responsible manner that serve the public interest, protect cultural and natural resources, and protect our treasured landscapes. While the NPS supports the development and modernization of our nation's energy grid, we maintain that it can and should be done using the least environmentally impactful methods. Addressing impact topics that effect NPS lands and NPS administered sites helps us provide the utmost protection of resources and the visitor experience.	The potential impact of the proposed transmission line on NPS lands and administered sites was analyzed in the Visual Resources (sections 3.10 and 4.10) and Land Use (sections 3.11.1 and 4.11.1) of the Draft EIS.
282	58	58.2	National Park Service	Trenchik/Montano	12-SD	Ch 2, Framework Plans. Page 42, Line 24. Request opportunity to review/comment on the following draft "Framework" plans when they are available – Noxious Weed Management Plan; Reclamation, Vegetation and Monitoring Plan; Plant and Wildlife Species Conservation Measures; and Avian Protection Plan.	Section 2.4.1 of the EIS has been revised to clarity that agencies like the NPS would incorporated into the development of Framework Plans, as appropriate.
529	78	78.2	Coalition For Sonoran Desert Protection	Campbell	12-SD	Impacts to Pima County's Conservation Lands System (CLS) On p. 948 (Impacts Common to All Action Alternatives – Construction), the DEIS states, "Potential impacts from construction activities that would be common to all action alternatives include direct ground disturbance and temporary increases in ambient noise levels in areas where the transmission line, substations, and ancillary facilities intersect with special designations…Increases in ambient noise levels, the presence of equipment, and dust would be temporary and would decrease with the completion of construction activities. Impacts to special designations during construction would be minor since the activities would be short-term in nature, and would not occur within special designations…Substation expansions that may occur within County special designations would be constructed in areas that are already in operation and have been previously disturbed."	Chapter 2 of the EIS has been revised to include additional information on substation expansion areas that was not available when the Draft EIS was prepared. Section 4.12 in chapter 4 of the EIS has been revised to clarify the potential impacts of the proposed Project on Pima County CLS.
530	78	78.3	Coalition For Sonoran Desert Protection	Campbell	12-SD	Furthermore, on p. 948-949 (Impacts Common to All Action Alternatives – Operation and Maintenance), the DEIS states, "Potential indirect impacts could include changes to the natural, historic, cultural, or visual character of some special designations. Other impacts could include increased access to areas due to the presence of access roads. This could lead to increased use of areas by OHV users, which could conflict with management objectives for some special designations."	This information was discussed in section 4.12 of the Draft EIS and includes Pima County CLS. Section 4.12 in chapter 4 of the EIS has been revised to clarify the potential impacts of the proposed Project on Pima County CLS.
531	78	78.4	Coalition For Sonoran Desert Protection	Campbell	12-SD	Lastly, on p. 954 (Subroute 3.1-Construction-Proponent Preferred), the DEIS states, "The impacts to Pima County special designations would be negligible since subroute 3.1 would occur in areas that already contain utilities, including existing Western lines. Further, the transmission line would span the important Biological Core and Important Riparian Areas and no towers would be constructed within the specially designated areas. The impact would be negligible to the Multiple Use areas since transmission lines are an allowable use for this designation, and existing Western lines are already in operation for all portions of subroute 3.1."	This information was discussed in section 4.12 of the Draft EIS and includes Pima County CLS. Section 4.12 in chapter 4 of the EIS has been revised to clarify the potential impacts of the proposed Project on Pima County CLS.
532	78	78.5	Coalition For Sonoran Desert Protection	Campbell	12-SD	The described impacts to other subroutes under consideration in Pima County reference the above paragraphs, along with other similar paragraphs for other subroutes addressed earlier in the DEIS (that also state that impacts will be "negligible"). In the spirit of brevity, we are not going to cite every paragraph that describes proposed impacts and mitigation for the large number of subroutes being considered. However, the three instances cited above provide a representative example of what is presented and proposed in the DEIS.	This information was discussed in section 4.12 of the Draft EIS and includes Pima County CLS. Section 4.12 in chapter 4 of the EIS has been revised to clarify the potential impacts of the proposed Project on Pima County CLS.
533	78	78.6	Coalition For Sonoran Desert Protection	Campbell	12-SD	We strongly disagree with the assertion that the Southline Transmission Line Project would cause "negligible" impacts to Pima County's CLS.	Section 4.12 in chapter 4 of the EIS has been revised to clarify the potential impacts of the proposed Project on Pima County CLS.
534	78	78.7	Coalition For Sonoran Desert Protection	Campbell	12-SD	The "Impacts Common to All Alternatives" for both construction and operation and maintenance describe significant potential impacts related to ground disturbance, increases to ambient noise levels, increased future access due to the presence of access roads, and the potential for increased use by OHV users.	This comment does not raise questions about the analysis or provide additional information for consideration. This information is stated and acknowledged in section 4.12 of the EIS. None of the potential impacts described in chapter 4 of the Draft EIS, or summarized in tables 2-11, 2-12, 2-13, or 2-14, in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) would be characterized as significant impacts resulting from the proposed Southline Transmission Line Project.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
270	52	52.1	New Mexico Wilderness Alliance	Calman	21-WILD	The DEIS says that a desk-top LWC inventory was done on a two-mile wide corridor along the proposed routes of the transmission line. It says that they established boundaries of potential units via satellite and GIS data, but they haven't done on-the-ground inventory for the naturalness and solitude criteria yet. It then says that this on-the-ground inventory of the units will be available in the Final EIS. Our concern is that if data is only made available when the Final is published, it means the actual inventory will never be available for public comment. So, is this really true, and if so, is there a reason that it's not being made available? It's our understanding that BLM Manual 6310 and BLM directives state that the inventories need to be made available to the public at the earliest possible time. I assume you'd need the inventories completed before making a final decision and issuing an FEIS.	The inventory herein is available for the public. No decision on the proposed Project would be made by BLM until at least 30 days after publication of the NOA for the Final EIS. Additionally, these inventories would later be incorporated in BLM's RMP when the respective RMP undergoes a revision or update; the public would have a chance to participate in that process, as directed by BLM and CEQ regulations.
681	82	82.100	SunZia	Wray	21-WILD	Wilderness. Section 3.13, page 492 – We request that wilderness characteristic units be developed for the Draft EIS. Because of this deficiency, impacts and, thus mitigation, cannot be determined, preventing sound analysis upon which an informed decision can be based.	Wilderness inventory units (WIUs) were described in sections 3.13 and 4.13 of the Draft EIS. Sections 3.13 and 4.13 of the EIS include an updated analysis that considers all four criteria (size, naturalness, opportunity, and other opportunities) and the results of fieldwork.
683	82	82.102	SunZia	Wray	21-WILD	In addition, impacts to wilderness character should be based on the project visual influence on the wilderness character unit. Contrast and KOPs should be used for this assessment.	BLM Manual 6310 does not require visual contrast rating sheets to ascertain a WIU's visual character. As discussed in sections 3.13 and 3.14, the "visual influence" is captured during the wilderness characteristics inventory under the "naturalness" assessment. While visual influence is considered, it is not the basis of the wilderness character as this comment indicates. There are many wilderness areas (designated) from which one can see transmission lines, but those instances are not in and of themselves characteristics that negate a wilderness designation, or in our case, potential for wilderness characteristics.
684	82	82.103	SunZia	Wray	21-WILD	Section 3.13.1, page 493 – According to VRM HB 6310, a wilderness characteristic study area should contain the entire wilderness character unit that is bisected or interferes with the project. In this manner, direct, indirect, and cumulative effects take into account the acreage of an entire unit. The impact is related to how many acres lose wilderness characteristics based on the 4 criteria (size, naturalness, opportunity, etc.).	Wilderness inventory units (WIUs) were described in sections 3.13 and 4.13 of the Draft EIS. Sections 3.13 and 4.13 of the EIS have been revised to include an updated analysis that considers all four criteria (size, naturalness, opportunity, and other opportunities) and the results of fieldwork.
685	82	82.104	SunZia	Wray	21-WILD	Cumulative effects should examine past, present, and reasonably foreseeable future actions measured against the acreage of wilderness characteristics.	The cumulative effects analysis for wilderness characteristics in section 4.21.4 has been revised in the EIS based on this comment, where spatial data are available for those actions considered in the analysis.
509	76	76.29	Arizona State Land Department	Ojeda	11-REC	Generally speaking, the DEIS should clarify ASLD's recreational permit process. Please refer to http://www.azland.gov/programs/natural/recreation_permit.htm	Section 3.14 in the EIS was updated to add information on the ASLD recreational permit process.
3	3	3.1	Westside Development Neighborhood Association	Zeeger	13-SOCI	The green line route will have an effect on all the neighbors along this route starting at Starr Pass and Coati Ave moving south along San Joaquin Ave to Kennedy Park. How will this be addressed?	The potential impact of the proposed transmission line and alternatives in terms of land use, social and economic consideration, and environmental justice was analyzed in chapter 4 of the Draft EIS (section 4.11, Land Use, and section 4.15, Socioeconomics and Environmental Justice). Section 4.15.3 of the Draft EIS discussed potential effects on property values from construction and operation in the Upgrade Section.
21	9	9.1		Cotignola	13-SOCI	We see that yous have plans to build a substation in Deming. Question #1 – What does that mean for Deming and the Rest of Southern Luna County New Mexico if anything at all	The potential impact of the proposed transmission line and alternatives in terms of land use, social and economic consideration, and environmental justice was analyzed in section 4.15 in chapter 4 of the Draft EIS. As discussed in section 4.15, the proposed alternatives could provide significant long-term benefits by increasing the ability of the grid to meet demand growth in the region.
23	9	9.3		Cotignola	13-SOCI	I'm sure that in time the Columbus Port of Entry will create growth & development North of it ok in fact that its job. But its our opinion we believe that on both of these roads & highways it would create job plus it would bring or attract growths South of Deming in Southern Luna County New Mexico which is very much needed. babe ruth once said if you build it they will come and if you build it come they will	The potential for Project related employment and changes in social and economic conditions was discussed in sections 3.15 and 4.15 of the Draft EIS.
24	9	9.4		Cotignola	13-SOCI	Plus I know a little bit about land location. If the South – West water is not the attraction for land buyers / home buyers & developer. in the South-West its mountain view like the Organ Mountain are for Las Cruces. Sometime land buyers & home developer will soon discover Southern Luna Counties Low land prices like I did.	The potential for Project related employment and changes in social and economic condition, including property value, was discussed in sections 3.15 and 4.15 of the Draft EIS. Additionally, information on potential visual impacts were discussed in sections 3.10 and 4.10 (Visual Resources) of the Draft EIS.
26	10	10		Skinner	13-SOCI	Concerned about transmission lines running to close to Village of Columbus residents	The location of proposed Project and alternatives, including proximity to Columbus, New Mexico, was described in chapter 2 of the Draft EIS. Additionally, the potential impact of the proposed transmission line and alternatives in terms of land use, social and economic consideration, and environmental justice was analyzed in chapter 4 of the Draft EIS (section 4.11, Land Use, and section 4.15, Socioeconomics and Environmental Justice). Finally, the Agency Preferred Alternative in the EIS does not include the route (subroutes 1.2 and 2.2) running close to Columbus, New Mexico.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
29	12	12		Harris	13-SOCI	1. Proposed will affect existing homes in the Akela area build around an air-park runway. 2. Proposed will affect exiting areas with housing north of Deming. 3. Proposed may result in increased cost in dealing with private land owners. 4. Alterative along US MEX border will be mainly across BLM and NM State trust land and affect very few homes and private property.	The potential impact of the proposed transmission line and alternatives in terms of effects on property values was discussed in section 4.15 of the Draft EIS. As discussed in chapter 2 (see section 2.7.1), the proposed route near Akela would parallel an existing EPEC 345-kV transmission line and would comply with FAA requirements. Tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) compared impacts of alternatives, including surface ownership and social and economic impacts.
195	38	38.12	Hearing	No ID Speaker	13-SOCI	Who is to gain monetarily and how much profit and what is going to be left in the area after you exit?	Southline Transmission Line, LLC (Southline), is the Project sponsor, as described in section 1.1 of the Draft EIS. Southline is an independent, private entity (a subsidiary of Hunt Power) and would profit from this proposed Project. The amount of profit is unknown.
196	38	38.13	Hearing	Yordani	13-SOCI	What are the benefits come out of this for our surrounding area? I guess his answer was our power hook-ups.	The potential for Project related employment and changes in social and economic conditions, such as employment and tax benefits, was discussed in sections 3.15 and 4.15. As discussed in section 1.3.1 of the Draft EIS, the Project includes multiple proposed interconnections with existing substations and has been designed to improve the electric transmission infrastructure in southern New Mexico and southern Arizona, including the Benson area, in order to strengthen the existing system.
243	46	46.6		Hamel	13-SOCI	I don't want those towers + lines negatively impacting the value of our ranch. And it will be a negative impact on our values.	Your opposition to the Project is noted and included here and in the Project Record. The potential impact of the proposed transmission line and alternatives in terms of effects on property values was discussed in section 4.15 of the Draft EIS.
258		49.9	Cascabel Working Group	Meader	13-SOCI	Section 2.4.3 Project Construction Activities, Upgrade of Existing Western Transmission Line, page 98. This section notes that the desired method of replacing the 115-kV line will be to build the new 230-kV lines next to it while leaving the old line in service, and then the old line will be removed once the new lines are in place. This requires the initial acquisition of an additional 125 feet of right-of-way for a 200-foot width with the final right-of-way increased by 50 feet to 150 feet. The line itself will be moved 100 feet from its present alignment. While this method seems acceptable in open country, it will likely raise strong objections where the line crosses private property, at least around Benson and through the J-6 Ranch and Mescal communities. If this route is chosen, as seems likely, it is strongly recommend that Southline not attempt to use this method to replace the line in these areas but that the old line first be taken out of service. The J-6 Ranch and Mescal residents have voiced the strongest objections to the project, and if their wishes are going to be overridden, the impact upon their properties should be minimized.	Section 2.4.3 of the Draft EIS described the upgrade of the existing Western 115-kV line. As described in this section in the Draft EIS, only an additional 50 feet of ROW would be required, not an additional 125 feet. The area through Tucson between Del Bac and Rattlesnake substations is not conducive to the parallel construction technique described; thus, outages on the line would need to be taken in order to tear out and rebuild on the existing 100-foot ROW. This section of the EIS has been revised for added clarity and to include information on the potential use outages on the line.
259	49	49.10	Cascabel Working Group	Meader	13-SOCI	Also, the increased height of the new poles may increase property owner objections because the poles are visible from greater distances. The width of the new poles and lines will be similar or less than the current width, the one difference being the addition of a second set of lines, so width seems a less objectionable parameter. The DEIS states that the height of the new poles can vary from 100-140 feet in height, with the distance between them varying from 700-1100 feet. I assume that the shorter pole heights would be used when the poles are closer together. It may be worth considering a minimal pole spacing to accommodate the lowest possible pole height. Current pole spacing through the J-6 and Mescal communities is 700 feet. Property owners should be asked whether this spacing and pole height would be more acceptable, with the new poles being placed in the same locations as the old ones, unless a property owner would like the locations changed. The issue here is lessening the objections, if possible, of those residents who are going to strongly object to this routing no matter what Southline does to lessen the impact.	As discussed in section 2.4.3 in the Draft EIS, the width of the structures and new conductors would be larger than the existing structures and conductors. Section 2.4.2 of the EIS has been revised to clarify that Western would work with private landowners during the micro-siting of the proposed line to minimize impacts.
288	60	60.3		Wood	13-SOCI	Destruction of property/vegetation (mine) during construction,	The potential impact of the proposed transmission line on property in terms of vegetation was described in chapter 4 of the Draft EIS. See section 4.8.1 for impacts to vegetation, section 4.15 for property value, and section 4.11 for land use (in the Draft EIS). See table 2-7 for design features for environmental protection in the Draft EIS (now table 2-8 in the EIS).
289	60	60.4		Wood	13-SOCI	Placement of new poles. I don't want them on my side of existing line and to be sure my neighbor opposite the line doesn't want them on his side	Section 2.4.2 of the EIS has been revised to clarify that Western would work with private landowners during the micro-siting of the proposed line to minimize impacts.
290	60	60.5		Wood	13-SOCI	Decreases usable/buildable property due to increased ROW easement.	Section 2.4.2 of the EIS has been revised to clarify that Western will work with private landowners during the micro-siting of the proposed line to minimize impacts, such as clarifying that some uses would not be allowed. The potential impact of the proposed transmission line on property in terms of land use was described in section 4.11.1 and in terms of property value in section 4.15 of the Draft EIS.
338	68	68.15	Pima County	Bernal/Connolly	13-SOCI	economic development locally and within the region	The potential for Project related employment and changes in social and economic conditions was discussed in sections 3.15 and 4.15 of the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
343	68	68.20	Pima County	Bernal/Connolly	13-SOCI	The recognition of this area as an economic lynchpin was initiated with Pima County's investment of $6 million to purchase the undeveloped areas of Section 31 in order to protect Raytheon Plant operations from encroachment. Subsequently, this area has been targeted for expansion of Aerospace, Defense, and Technology employment and is a critical component for an industrial corridor from Nogales Highway to I-10. Section 31 is also an integral part of those lands south of Tucson International Airport that the Joint Planning Advisory Council which includes the Pima, Maricopa, and Central Arizona Associations of Governments has identified as the ideal location for the Import Distribution Center for the State of Arizona for goods coming into the United States from Mexico and Asia. The Arizona Commerce Authority has referred several potential tenants to the Business Park who would require between 500 to 1,000 acres for their operations. TESLA, one of the pending, potential tenants, is currently examining the feasibility of locating a $5B battery development and manufacturing facility to this site. Development of a significant employment center is an important socioeconomic factor for this region which currently suffers from high unemployment. Investments and partnerships supporting federal needs and interests of the FAA Tucson Airport Authority, US Air Force, National Guard Bureau, and Raytheon have led to the relocation of 4 miles of the Hughes Access Road at a cost approximating $12M, in addition to the development of the Aerospace, Defense, Technology Research and Business Park (see Exhibit B).	Section 4.15 in the EIS has been revised to include additional information on the economic importance of this area.
470	73	73.4	Sonoita Hills Community Association		13-SOCI	As was the situation in the Chino Hills case, the proposed Upgrade Section structures in the Mountain View Ranch Subdivision and .surrounding single-family residential community area(s) would be "located right outside the residents' backdoors . . . [and would] transform the open space along the right-of-way to an eye sore." [See Decision No. 13-07-018 at pages 11-12] In addition, we believe that the proposed replacement facilities would destroy the property value of those who reside along the 100' right-of-way herein question.	As discussed in section 1.1 of the Draft EIS, the existing Western line was constructed in 1951; thus, the line and ROW predate the Mountain View Ranch Subdivision by more than 50 years. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the Draft EIS.
710	82	82.129	SunZia	Wray	13-SOCI	Environmental Justice The impact analysis for the environmental justice population is deficient in two ways. First, the impact indicator and determination of significant impacts for environmental justice populations do not meet the context and intensity requirements for evaluation in a NEPA document. For example, as stated in the Draft EIS Section 4.15.2, the impact indicator for Environmental Justice Populations is "…anticipated high and disproportionate adverse socioeconomic or environmental effects on environmental justice communities relative to effects across the analysis area as a whole", whereas, the determination of significant impacts are stated in the Draft EIS as "(h)igh and disproportionate adverse effects on environmental justice communities." This does not explain the range or scale of impacts, for environmental justice populations, and therefore no meaningful comparison between alternatives can be made.	Sections 3.15 and 4.15 in the EIS have been revised to clarify indicators and determinations of significance for environmental justice; however, no high or disproportionate impacts to environmental justice communities are anticipated.
711	82	82.130	SunZia	Wray	13-SOCI	Second, the analysis area of environmental justice populations is too narrow in the Upgrade Section. To make a meaningful evaluation of disproportionately affected environmental justice populations, the reference-area comparison should contain a geographic boundary that is indicative of the overall population of the urbanized areas around Tucson. This will more accurately reflect the relative disproportionate effects on environmental justice populations.	The analysis area in the Draft EIS (sections 3.15 and 4.15) was identified based on the area most likely to bear environmental effects. As stated in section 4.15 of the Draft EIS, no high or disproportionate impacts to environmental justice communities are anticipated.
712	82	82.131	SunZia	Wray	13-SOCI	The determination in Section 4.15.2, pages 1020–1021 is that "In the Upgrade Section, 26 of the 38 Census tracts that could be crossed by any of the action alternatives can be defined as potential environmental justice communities…, few, if any, of these adverse effects would be "high" and, given the prevalence of low-income and minority residents throughout the area, disproportionate impacts on these groups are likely inevitable from any feasible transmission line alignment." Given that the majority of census tracts crossed by the Southline Project are defined as environmental justice populations, the land-use impacts that are related to condemnation and recreation that have not been disclosed in the Draft EIS (see Specific Resource Areas of Concern-Land Use, in this comment letter) would likely disproportionately affect environmental justice populations resulting in high impacts. The analysis needs to be corrected in order to fully disclose the level of impact on environmental justice populations. The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Sections 3.11.1 and 4.11.1 (Land Use) and sections 3.15 and 4.15 (Socioeconomics and Environmental Justice) in the EIS have been revised to clarify the relationship between land use and environmental justice communities; however, no high or disproportionate impacts to environmental justice communities are anticipated.
728	82	82.147	SunZia	Wray	13-SOCI	Additionally, the non-disclosure of potentially significant environmental impacts to Land Use and Environmental Justice population through Tucson resulting from the construction and operation of the Upgrade Section should have instigated a search for alternatives that would have less impact on these important environmental resources.	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. As noted in section 2.6 of the Draft EIS, alternatives were developed based on environmental concerns expressed during scoping, including the potential for major environmental impacts; consideration of the BLM and DOE NEPA guidelines, including recommendation to evaluate or dismiss; and review of all route alternatives and rationale by cooperating agencies and the ID team. Section 2.9 of the Draft EIS describes other alternatives that were dismissed from consideration. Further, no other alternatives were identified that would meet the goals of the Project (i.e., interconnections with existing substation) and were otherwise reasonable.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
736	82	82.155	SunZia	Wray	13-SOCI	Southline Transmission Project Resource Report 11: Socioeconomics and Environmental Justice. This report was reviewed to ascertain the level of detail that was used to determine and disclose impacts that could result from the construction and operation of the Southline Project as reported in the Draft EIS. The analysis of determination of potential environmental justice populations does not meet the CEQ guidance provided in Environmental Justice; Guidance Under the National Environmental Policy Act (CEQ 1997).	The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS.
737	82	82.156	SunZia	Wray	13-SOCI	The analysis provided in the resource report confuses the suggested method for determining the presence of environmental justice populations. As quoted, CEQ guidance in the resource report Section 11.2.1: “minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographical analysis.” The analysis disregards the operation and significance of the conjunction ‘or’ and relies only on one criterion for the determination of environmental justice populations within the area of analysis for the Southline Project. For example: CH2M Hill 2013, page 11-28); CH2M Hill 2013, page 11-30); (CH2M Hill 2013, page 11-39); (CH2M Hill 2013, page 11-40). This is an egregious oversight and disregards potential environmental justice populations that are likely present by the data shown in Tables 11-12, 11-13, 11-22 and 11-23 of the resource report. CEQ guidance suggests that if either of the conditions (i.e., environmental justice populations greater than 50% or percentage of the affected area is meaningfully greater than the environmental justice population percentage in the reference area) is satisfied, then environmental justice populations are present. The use of only one condition for determination is inadequate and therefore the conclusions are incomplete.	The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS.
738	82	82.157	SunZia	Wray	13-SOCI	A detailed analysis and rationale for determining a meaningfully greater proportion of environmental justice populations within the area of analysis when compared to an appropriate unit of geographical analysis is absent from the resource report and Draft EIS. The results of this additional analysis would likely constitute significant disproportionate impacts to environmental justice populations as a result of the construction and operation of the Southline Project, particularly in the Upgrade Section, and potentially within the new build section as well.	Sections 3.15 and 4.15 in the EIS have been revised to clarify indicators and determinations of significance for environmental justice.
739	82	82.158	SunZia	Wray	13-SOCI	Additionally the results should be evaluated for high and adverse impacts. The further identification of the presence of environmental justice populations within the areas of analyses should be further evaluated in terms of context and intensity when compared to the location of environmental impacts identified for the Southline Project. For example, where environmental justice populations are identified for visual impacts, land use/condemnation, health and hazardous materials, system outages, socioeconomic impacts, etc., they should be evaluated for a determination of disproportionality to environmental justice populations when compared to the geographical area of analysis (reference area). These results should then be compared to the other alternatives examined in detail by the Draft EIS. However, since no alternatives in the Upgrade Section avoid environmental justice populations or communities, disproportionate impacts to these populations (potentially significant) are unavoidable. We request that this analysis be corrected and the remaining resource reports be evaluated and corrected should errors be found.	Sections 3.15 and 4.15 in the EIS have been revised to clarify indicators and determinations of significance for environmental justice. The Southline Transmission Line Resource Reports cited in the Draft EIS are some of many valuable reference documents used in the analysis. Data used in the Draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS.
740	82	82.159	SunZia	Wray	13-SOCI	The level of analysis outlined herein should have been done in connection with the Draft EIS, but, having failed to do so, the BLM and Western are now required to supplement the Draft EIS and re-publish it for public review and comment. The lack of sufficient identification and analysis of impacts to environmental justice populations cannot be cured between the Draft and Final EIS.	Please note that the EIS reflects consideration of all comments received during the public comment period on the Draft EIS. The EIS includes responses to comments received during the public comment process (chapter 8 of the EIS) and provides revised EIS text based on those comments. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
779	83	83.12	Audubon Arizona	Supplee	13-SOCI	Economic Values of Ecotourism. We wish to emphasize the economic values of watchable wildlife, particularly bird watching, to the communities of the San Pedro River and its tributaries, as well as Willcox. The Willcox Playa and associated environs represent well-known ecotourism hot-spots and birders in particular come from all over the world to bird this region. Ecotourism is especially important for the dispersed rural communities in Cochise, Pima and Pinal counties. Willcox hosts a major birding festival focused upon the wintering Sandhill Crane (Grus canadensis) population that attracts hundreds of visitors every year. If ecotourism were reduced because of direct, indirect and cumulative impacts of the transmission line, there would be direct economic impacts to the various communities, from Winkelman to Benson and Willcox, that are not assessed in the DEIS. In a 2006 study, the Outdoor Industry Foundation reported that all outdoor wildlife-related recreational activities generated $730 billion annually for the United States economy, and of that, watchable wildlife generated $43 billion annually. They reported 66 million Americans participated in wildlife viewing, which supported 466,000 jobs. Estimated economic returns included retail sales averaging $8.8 billion, trip related expenditures of $8.5 billion, and state and federal tax receipts of $2.7 billion. The report is available at http://www.outdoorindustryfoundation.org./ Although much of this economic impact is due to outdoor recreation, other visitors may come to these areas for sight-seeing, for family gatherings, for educational benefits and for many other values not captured by the category of outdoor recreation. According to a 2011 study by the National Fish and Wildlife Foundation, http://www.nfwf.org/Content/ContentFolders/NationalFishandWildlifeFoundation/HomePage/ConservationSpotlights/TheEconomicValueofOutdoorRecreation.pdf, a minimum estimate of the combined value of outdoor recreation, nature conservation and historic preservation shows that over 9.4 million jobs were created while $107 billion was generated by local, state and federal tax revenues. The most recent economic analysis using US Fish and Wildlife Service data calculated for each Arizona county states that ecotourism is worth over $1.5 billion dollars to Arizona each year - over $300 million in Pima County, over $95 million in Pinal County, and over $25 million in Cochise County each year. http://tucsonaudubon.org/images/stories/conservation/AZ_County_Impacts_-_Southwick.pdf. This analysis revealed that Arizona created 15,058 full and part-time jobs and accounted for salaries and wages of $429,391,051, or nearly $430 million in total household income. Arizona engendered over $57 million in state taxes (state sales taxes of $46,756,837 and state income taxes of $10,821,828) and federal income taxes of $75,544,307. Home owners near parks and protected areas are repeatedly seen to have property values more than 20% higher than similar properties elsewhere. This information should be included in the economic analysis section of the DEIS.	Section 3.15.9 (Tourism and Recreation) in chapter 3 of the EIS has been revised to include additional information on the economic value of ecotourism. Further, potential impacts to eco-tourism were a consideration in the decision to include route variations P7a, P7b, P7c, and P7d in the EIS.
27	11	11		Howell	16-PHS	1. How do you deal with leakage from lines or electrical appliances, tv, ratio, etc. 2. How is livestock affected? Also humans?	Information on concerns about EMF and the potential effects on humans from electromagnetic fields from the proposed transmission line was described in sections 3.16 and 4.16 of the Draft EIS. Sections 3.11.2 and 4.11.2 of the EIS have been revised to consider how EMF may affect livestock.
165	32	32.11	EPA	Jansky/Weeks	16-PHS	Public Health and Safety. Chapters 3 and 4. Valley Fever (coccidioidomycosis) has a high prevalence rate in Arizona. Of the 150,000 valley fever infections diagnosed each year in the US, 60% occur in Arizona. Since the Arizona Department of Health Services made it a reportable disease in 1997, the rate of new Valley Fever cases has more than quadrupled over the last decade from 36 cases per 100,000 population in 1999, to 155 cases per 100,000 in 2009. More than 90% of the reported cases occur within a narrow 200 mile corridor generally following Interstate 1O; stretching from Northwest Maricopa County to Green Valley in the southern part of Pima County. This area includes the major metropolitan areas of Phoenix and Tucson. Recommendation: The Final EIS should consider that workers contracting Valley Fever is a possibility, and describe any additional mitigation or prevention measures that may be used.	Sections 3.16 and 4.16 in the EIS have been revised to address potential impacts to construction workers for Valley Fever.
209	38	38.26	Hearing	No ID Speaker	16-PHS	What' s the physical impact? If it's going through our property and we 're right there by it, what' s the physical impact on humans?	Information on concerns about electrocutions and the potential effects on humans from EMFs from the proposed transmission line was described in sections 3.16 and 4.16 of the Draft EIS.
223	41	41.8	Hearing	No ID Speaker	16-PHS	On that same topic, the -- the handout you have about the electromagnetic fields, it says that if you are 300 feet from the edge well, if you're a hundred feet from the edge of the right-of-way you're at 20. What would that be the equivalent of? So if you had a house, how close would you put it to that.	Information on concerns about the potential effects on humans from EMFs from the proposed transmission line was described in sections 3.16 and 4.16 of the Draft EIS. As noted in the Draft EIS, EMFs emitted by the proposed Project would not exceed exposure guidelines proposed by the ICNIRP, the IEEE, and the ACGIH.
286	60	60.1		Wood	16-PHS	I am concerned about the following. A) Health hazard to me and my family and others who live near the transmission line due to double voltage and double wires.	Information on concerns about electrocutions and the potential effects on humans from EMFs from the proposed transmission line were described in sections 3.16 and 4.16 of the Draft EIS. As noted in the Draft EIS, EMFs emitted by the proposed Project would not exceed exposure guidelines proposed by the ICNIRP, the IEEE, and the ACGIH.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
349	68	68.26	Pima County	Bernal/Connolly	16-PHS	The Draft EIS states that "[A]ll future or planned land uses in Pima and Pinal counties, Arizona, would be required to conform to the terms and conditions of the proposed Project and alternatives where applicable, if a ROW is granted by the BLM." Given the binding nature of this requirement, a detailed study on the economic, environmental, and social impacts of high voltage transmission lines (HVTL) on adjacent and abutting properties is greatly desired. It is understood that the project proposes to share existing transmission line rights-of-way in certain areas but there are no data provided on what impacts doubling the Kilo Volts on these lines will have on adjacent property, given that almost 30 miles of the ROW occurs on private land.	Information on concerns about electrocutions and the potential effects on humans from electromagnetic fields from the proposed transmission line were described in sections 3.16 and 4.16 of the Draft EIS. As noted in the Draft EIS, EMFs emitted by the proposed Project would not exceed exposure guidelines proposed by the ICNIRP, the IEEE, and the ACGIH.
431	68	68.108	Pima County	Bernal/Connolly	17-TRANS	The Pima County Department of Transportation has reviewed the proposed Southline Transmission Project regarding the proposed high voltage upgrade and rebuild of transmission lines through Pima County, as indicated on their submittal document. Any work adjacent to or within Pima County right of way should be coordinated with the Department of Transportation. Please contact Robert Johnson (520) 724-6461 or Ted Roberts (520) 724-6367, who coordinate utilities with County right of way.	Sections 3.18 and 4.18 of the EIS have been revised to include information that proposed Project work adjacent to or within Pima County ROW would be coordinated with the Pima County Department of Transportation.
432	68	68.109	Pima County	Bernal/Connolly	17-TRANS	Pima County has established and adheres to certain roadway development standards and regulations to preserve and protect natural cultural resources to prevent and reduce air pollution and to insure safe public transportation facilities. Pima County objects to and does not support any request within public right of way unless there are appropriate conditions of the right of way application approval. The conditions of the approval should preserve and protect natural and cultural resources (plant survey and preservation plan cultural resources survey), prevent the reduce air pollution (paved roadway) and insure safe public transportation facilities (provisions for drai9nage and appropriate roadways design, width, horizontal and vertical alignment).	Sections 3.18 and 4.18 of the EIS have been revised to include information on roadway development standards in Pima County, per Pima County Department of Transportation guidelines.
142	27	27.1	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	17-TRANS	I am the New Mexico State University's Unmanned Aircraft Systems Flight Test Center (UAS FTC) Deputy Director, and it was suggested that this might interfere with our conducting of UAS test flights. I do not believe that this is the case, however, in the interest of safety of flight for these UAS and our manned aircraft assets, I thought I would get in touch and research some basic information. I have noted that it will be a 345 KV line or group of lines going from Afton, NM to Apache, AZ	Sections 3.11.1 and 4.11.1 (Land Use) of the EIS have been revised to include information on NMSU's Unmanned Aircraft Systems Flight Test Center. The proposed Project and alternatives were described in chapter 2 of the Draft EIS.
146	27	27.5	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	17-TRANS	NMSU's UAS FTC was the first UAS FTC in the national airspace system (NAS) and began in 2007. We have performed some research with EPRI on distribution lines. We currently have many UAS assets and are continuing to work with the FAA on the concept of operations and safe flight of UAS for civil applications in the NAS. If you would like, NMSU UAS FTC would be happy to discuss and work with you using UAS to support your efforts in the terrain mapping of the line, recording the building of the line, and developing UAS procedures for performing inspections.	Thank you for your comment and offer of assistance. Sections 3.11.1 and 4.11.1 (Land Use) of the EIS have been revised to include information on NMSU's Unmanned Aircraft Systems Flight Test Center.
147	27	27.6	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	17-TRANS	I have attached a handout of the NMSU Unmanned Aircraft Systems Flight Test Center. The gray shaded area is our FAA approved flight area, but additional space can be attained if needed. At the meeting, I mentioned that UAS might be an asset in you environmental impact assessment. Also UAS would be a very good tool for the design and planning for the pipeline. Advances in UAS and sensors have mapping down to 4 cm and provide excellent accuracy	Thank you for your comment and offer of assistance. Sections 3.11.1 and 4.11.1 (Land Use) of the EIS have been revised to include information on NMSU's Unmanned Aircraft Systems Flight Test Center.
148	27	27.7	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	17-TRANS	The southline as proposed will have not have any impact on the New Mexico State University Unmanned Aircraft Systems Flight Test Center.	Sections 3.11.1 and 4.11.1 (Land Use) of the EIS have been revised to include information on NMSU's Unmanned Aircraft Systems Flight Test Center.
433	68	68.110	Pima County	Bernal/Connolly	17-TRANS	Scenic Route requirements of the Chapter 18.77.040.E5 apply for roadways designated Scenic per the Pima County Major Streets and Scenic Routes Plan.	Sections 3.18 and 4.18 of the EIS have been revised to include information on scenic route requirements in Pima County, per the Pima County Major Streets and Scenic Routes Plan.
264	49	49.15	Cascabel Working Group	Meader	18-TRAIL	Section 3.9.6, Analysis Area Conditions, Historic Trails and National Historic Trail Corridor, Pages 350-352. Although this is not a deficiency in the DEIS, it may be of interest because of the various trails mentioned in this section. In 1856–57 the Department of the Interior built or routed the Yuma–El Paso Wagon Road (the Lynch Wagon Road) across the area that the Southline Project traverses. The Southline will cross it at some location(s). Finding this route would be nearly impossible today, but I am attaching a map that shows the route from El Paso to central Arizona. A portion of the route is still used today by ranchers along the Tres Alamos Wash northwest of Croton Springs on the Willcox Playa.	Sections 3.9 and 4.9 of the EIS have been revised to include information on the Yuma–El Paso Wagon Road.
471	74	74.1	U.S. Forest Service	White	18-TRAIL	I am pleased to see much of my previous recommendations incorporated into the DEIS. One error remains regarding the Arizona Trail on Pg. F-9, line 13: "At this time, a CMP has ye to be developed for the Arizona Trail, and there is no lead agency identified."	Appendix F in the EIS has been revised to correct this information.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
472	74	74.2	U.S. Forest Service	White	18-TRAIL	As the assigned administering agency for the Arizona Trail, the U.S. Forest Service is the lead agency in the development of the CMP. This should be corrected in Appendix F and anywhere else it may occur in the DEIS.	Appendix F in the EIS has been revised to correct this information.
473	74	74.3	U.S. Forest Service	White	18-TRAIL	As I had difficulty downloading the documents into a searchable format, I was unable to locate the mitigation measures related to the project design criteria to see if my recommendations were incorporated.	Project design features previously provided were included in table 2-7 in the Draft EIS (now table 2-8 in the EIS).
476	74	74.6	U.S. Forest Service	White	18-TRAIL	Construction of additional roads crossing the trail and disturbance of the trail tread should be avoided. National Scenic Trails are intended to be in a non-motorized setting and mitigation should include measures to prevent motor vehicles of any kind from accessing the ANST or CDT during or after construction, or coming within a quarter mile of the ANST on routes created by the project, after it is completed. The primitive roads south of I-10, including those following utility corridors, are very popular with off-highway vehicles. Some of these motorized recreationists are very persistent and monitoring may be needed to ensure closed and rehabilitated project access roads are not reopened, leading to access to the ANST.	As stated in chapter 2 of the Draft EIS, the proposed Project would be designed, as feasible, to use existing access roads with minimal improvement to minimize creation of additional access routes. The intent is to do no more than is necessary to get equipment in and out safely and to prevent erosion and damage to vegetation. Post-construction monitoring of OHV users is the responsibility of the landowner or manager.
477	74	74.7	U.S. Forest Service	White	18-TRAIL	My recommendation about the State Land Department ROW for the Arizona Trail, held by Pima County, was incorporated and I would like to add that the time of year of construction will make a big difference for trail users. Most through hikers and riders will be passing through in Feb – April and Oct – Nov. The trail is used more lightly during the summer months. It is very popular with day hikers and riders and this activity occurs more during the cooler season.	Impacts to trail users would be minor and limited to conductor stringing operations since the trail crossing would be mid-span (see table 2-14 (now table 2-18 in the EIS) and section 4.12 in the Draft EIS). Any trail impacts would be brief (a few hours at most) and directed toward the safety of trail users.
478	74	74.8	U.S. Forest Service	White	18-TRAIL	All possible measures should be taken to provide a reasonable detour during the time construction is occurring in the area of the Arizona Trail. These considerations also apply to the Continental Divide Trail, although day use in the affected sections is probably minimal.	This is a Project design feature in table 2-7 in the Draft EIS (now table 2-8 in the EIS).
687	82	82.106	SunZia	Wray	18-TRAIL	National Historic and Scenic Trails Comment 106. Appendix F, page F-10 – Per BLM guidance (see HB 6250 and 6280), trail organizations associated with each trail should be brought into the process for national trails analysis. For Southline, these public organizations include Continental Divide Trail Society, Continental Divide Trail Coalition, Anza Trail Foundation, Anza Trail Coalition of Arizona, and the Arizona Trail Association. To be fully compliant with the guidance, meetings to inform these relevant organizations should occur. Please describe planned actions for complying with BLM's guidance on this issue.	Members of the public, including trail organizations, were afforded the opportunity to review the analysis in the Draft EIS. Members of the public did provide comments on National Historic and Scenic Trails. Additionally, the National Park Service is charged with managing trails and is also involved in this process as a cooperating agency. The EIS addresses all comments received during the public comment period (chapter 8). The EIS includes responses to comments received during the public comment process and provides revised EIS text based on those comments. As the Project continues, BLM will continue to work with these trail groups in addressing trail impacts from the Project. These groups will be instrumental in assisting BLM with many aspects of compliance with Section 106 (historic trails) and the BLM Manuals 6250 and 6280. BLM also coordinates with the Oregon-California Trails Association (OCTA), Southern Trails Chapter.
688	82	82.107	SunZia	Wray	18-TRAIL	Appendix F, pages F-10 – One mile on either side of the centerline is not consistent with the visual resource study. As stated in the visual resource assessment, a 10-mile buffer was used to assess visual impacts. If visual impacts were identified to that distance, the trail's visual values would be impacted, and therefore the analysis using a 2-mile buffer is inadequate.	The analysis area in the Draft EIS was identified based on the area most likely to bear environmental effects. Please note that the analysis area in the Draft EIS (appendix F) is consistent with the analysis area used for the same analysis in the SunZia Southwest Transmission Line Final EIS (see appendix L).
689	82	82.108	SunZia	Wray	18-TRAIL	The public trail organizations know the trail resources and should be consulted regarding the appropriate analysis area in conjunction with the relevant agencies and trail administrators.	The public trail organizations and the trail administrators and relevant agencies were consulted on the proposed Project. Members of the public, including trail organizations, were afforded the opportunity to review the analysis in the Draft EIS. Members of the public did provide comments on National Historic and Scenic Trails. The EIS addresses all comments received during the public comment period. The EIS includes responses to comments received during the public comment process (chapter 8) and provides revised EIS text based on those comments.
690	82	82.109	SunZia	Wray	18-TRAIL	Appendix F, pages F-18 – Mitigation planning and residual impacts – the terminology in this section is not consistent with other sections in the Draft EIS; please conform or explain this inconsistency.	Appendix F in the EIS has been revised for consistency.
573	80	80.11		Magruder	9-NEPA	5. Compared with the SunZia project. The SunZia Project is a proposed and competing alternative to the Southline Project. There is a reasonable probability only one of these projects will eventually be constructed. As both can meet similar east-west transmission requirements, comparison of their critical characteristics will be important considerations for all non-federal decision makers in the cities, counties and both Arizona and New Mexico/El Paso in addition to the various federal decisions makers required by NEPA to issue a Record of Decision (ROD). Briefly below, some of the critical performance characteristics of these two systems are discussed below.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
580	80	80.18		Magruder	9-NEPA	6. Conclusion. It is concluded that the proposed Southline Transmission Project Alternative uses the best approach for ROWs, increases necessary additional power needs for customers in Southern Arizona and New Mexico/El Paso, significantly increases reliability for all these customers, can resolve the issues involving the Apache Power Plant with an interconnection at the Apache Substation, and removes any possible constraints on the transmission lines to El Paso, Texas. Two Alternatives should be in either a Supplemental EIS or the Final EIS, to include (1) Impacts of re-locating the “Bowie” natural gas power plant near the Apache Power Plant and (2) Comparison of the impacts of the Southline versus the SunZia Projects in Southern Arizona and New Mexico. 7. Recommendation. It is recommended that the Southline Project final EIS or a Supplemental EIS include two new Alternatives for the impacts for relocating the “Bowie” natural gas plant at the Apache Power Plant and to compare the Southline and SunZia Projects impacts on Southern Arizona and New Mexico/El Paso customers.	The not yet constructed SunZia project, and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western’s evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western’s Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. A comparison with the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter’s concerns were best directed at that process for appropriate consideration. Please note that the EIS reflects consideration of all comments received during the public comment period. The EIS includes responses to comments received during the public comment process and provides revised EIS text based on those comments. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Considering relocation of the Bowie natural gas plant is out of the scope of the current analysis and does not meet the agencies' purpose and need, as described in chapter 1.
6	5	5.2	Town of Marana	Spencer	9-NEPA	I read the Draft EIS and I urge you to locate your transmission lines so they do not cross through or near wetlands and sandhill crane wintering areas. I am one of the thousands of people who visit Willcox Playa, AZ and Bosque del Apache, NM annually to view the cranes, snow geese, hawks, eagles, and waterfowl.	In coordination with the Arizona Game and Fish Department, the EIS has been revised to consider additional minor route variations (P7a, P7b, P7c, and P7d) near Willcox Playa. AGFD has provided mitigation measures to improve wildlife habitat and thus offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8 and include funding the relocation of Crane Lake, funding riparian emergent wetlands, and funding the management of non-native vegetation.
7	5	5.3	Town of Marana	Spencer	9-NEPA	Mitigating by using “line marking devices” should not be your first option- avoidance of these sites should be the priority.	Additional mitigation for vegetation and wildlife was provided by the FWS and is considered in the EIS; relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation. In addition, and in coordination with the AGFD, chapter 2 of the EIS has been revised to consider additional minor route variations (P7a, P7b, P7c, and P7d) near Willcox Playa. AGFD has also provided mitigation measures to offset impacts to wildlife habitat in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8; P7 remains included in the Agency Preferred Alternative.
8	5	5.4	Town of Marana	Spencer	9-NEPA	I read that the Forest Service did not like one of the alternate routes around the Willcox Playa because of fire hazard management, but that is not an acceptable reason to route the line near important bird areas like the Lordsburg and Willcox Playas.	Alternatives considered but eliminated from detailed analysis are discussed in section 2.9 of the Draft EIS. Chapter 2 of the EIS has been revised to consider minor route variations (P7a, P7b, P7c, and P7d) near Willcox Playa. AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
10	5	5.6	Town of Marana	Spencer	9-NEPA	The cumulative effects of habitat loss, disruption of migratory routes, and potential electrocutions of birds creates an increasingly serious threat to our birds.	The anticipated cumulative effects of the proposed Southline Project, along with other reasonably foreseeable projects in terms of potential avian impacts, were described in section 4.21 of the Draft EIS.
11	5	5.7	Town of Marana	Spencer	9-NEPA	I strongly urge you to avoid the Lordsburg and Willcox Playas and to take great care to avoid affecting burrowing owls.	Mitigation for burrowing owls can be found in chapter 2 of the EIS (see table 2-8). The potential impact of the proposed transmission line on wildlife was analyzed in section 4.8 of the Draft EIS.
17	8	8.2		Anderson	9-NEPA	What if any, is the connection with the Sunzia	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western’s evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western’s Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter’s concerns were best directed at that process for appropriate consideration.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
19	8	8.4		Anderson	9-NEPA	I note that the Proponent Alternative from Wilcox AZ to Afton NM: 2. Might alleviate the need for building one or both of the two substations which are shown as the Agency Preferred Alternative – one could perhaps just upgrade the existing Afton substation if necessary.	The proposed Project and alternatives are described in chapter 2 of the Draft EIS. As discussed in section 2.4.2 of the Draft EIS, the proposed Project would involve the interconnection with and upgrades of 14 existing substations and the potential construction of one new 345-kV substation facility proposed for Luna County, New Mexico (referred to as "Midpoint Substation").
22	9	9.2		Cotignola	9-NEPA	Question #2 – by building this doesn't that mean that elic power poles & power lines in time can then run & be built south of Deming off of Hwy #11 & Hwy OR County Road #C010 South 10 to Columbus, NM	The potential impacts of reasonably foreseeable actions, such as future transmission line projects, are acknowledged and described in section 4.21 of the Draft EIS.
33	15	15	BIA		9-NEPA	Page 19: The appropriate BIA law/regulation associated with our federal action is 25 CFR Part 169.	Table 1-5 in chapter 1 of the EIS has been revised based on this comment.
34	15	15	BIA		9-NEPA	Page 23,line 35: Should have included Tribal Historic Preservation Officer (THPO) .	Section 1.7 in chapter 1 of the EIS has been revised based on this comment.
35	15	15	BIA		9-NEPA	Page 24, line(s) land 2: Should include THPOs also.	Section 1.7 in chapter 1 of the EIS has been revised based on this comment.
36	15	15	BIA		9-NEPA	Page 25, line 8: Actually negotiating with the San Xavier District of the Nation Requires BIA action to renew existing easement(s) and issue new ROW for the additional 50 feet. There is no mention of the BIA action (that BIA is a fellow action agency) other than the table on page 19.	Chapter 1 of the EIS has been revised based on this comment, and clarifies what the BIA's role is and BIA's decision to be made.
37	15	16	BIA		9-NEPA	Page 28, lines 5-9: Was there specific outreach to the Nation? No mention of meetings with the Nation or the District specifically.	Information on all outreach with Native American Tribes, including the Tohono O'odham Nation and San Xavier District, is discussed in section 5.5, chapter 5, of the Draft EIS.
38	15	16	BIA		9-NEPA	Page 48, lines 26-31: It is anticipated that final acquisition of the additional 50 feet through allotments would/could be done at a later date? It would appear that a BIA decision document synchronous with the Bureau of Land Management (BLM)/Western Area Power Administration (WAPA) Record of Decision (ROD) is not expressly required as discussed in previous teleconferences?	Chapter 1 of the EIS has been revised to clarify what the BIA's role is and BIA's decision to be made and the status of the ROW lease negotiations between Western, BIA, and the Tohono O'odham Nation.
39	15	16	BIA		9-NEPA	Page 49, lines 20-25: Can the BIA expect that if needed, Southline/WAPA will conduct archaeological surveys and Pima pineapple surveys across San Xavier when the time comes?	Table 2-8 (previously table 2-7 in the Draft EIS) regarding project design features and mitigation in chapter 2 of the EIS has been revised to indicate that archaeological surveys and species specific surveys for the Pima pineapple cactus on the San Xavier would be conducted for the additional 50 feet of ROW. The existing ROW has been the subject of archaeological and Pima pineapple cactus surveys over the years (see sections 3.8 and 4.8 of the EIS).
40	15	16	BIA		9-NEPA	Page 93, line 11: No construction yards are proposed to be located on the San Xavier Reservation? BIA would need to be informed as to location and dimension so that it could be accommodated in the ROW.	Chapter 2 of the EIS has been revised to include more detailed maps indicating where potential staging areas (construction yards) would potentially be located. Additionally, chapter 1 of the EIS has been revised to clarify what the BIA's role is and BIA's decision to be made, including approval of any staging areas, if needed.
47	15	15.15	BIA		9-NEPA	The BIA Western Region Realty staff continues to work with WAPA and the San Xavier District, along with the individual land owners, to see the ROW renewal and eventual 50- foot acquisition through to completion. At this time we see no issues that would jeopardize the projected completion date of BLM/WAPAs FEIS/ROD.	Thank you for your comment.
48	16	16.1		Kestler	9-NEPA	Thank you for not crossing Tumamoc Hill. This is an important concern for me	Thank you for your comment.
49	16	16.2		Kestler	9-NEPA	Please limit access to 150 feet - more is unnecessary	The proposed Project and alternatives were described in chapter 2 of the Draft EIS, including the proposed width of the Western ROW.
51	16	16.4		Kestler	9-NEPA	Please keep building minimal in all areas and, as much as possible reuse existing lines, poles, etc.	The proposed Project and alternatives, as well as project design features, were described in chapter 2 of the Draft EIS.
52	17	17.1	City of Tucson	Dent/Romero	9-NEPA	We appreciate avoiding Tumamoc hill with the preferred alignment. Neighbors in A-mountain neighborhood (south of Tumamoc hill & Sentinel Peak) have concerns about disruption of project.	As described in chapter 2 of the Draft EIS, there are several options for alternatives around Tumamoc Hill. Alternatives considered in detail in the Draft EIS were described in chapter 2. The potential environmental impacts of all alternatives considered in detail were described in chapter 4 of the Draft EIS.
53	17	17.2	City of Tucson	Dent/Romero	9-NEPA	Councilor Regina Romero would appreciate additional dialogue with neighbors, and consideration of mitigation below powerline. This could include discussions regarding possible natural resource park, walking paths, and trails below the lines. Assistance with funding for these mitigation efforts may be appreciated by neighbors seeking area improvements.	Post-construction ROW uses such as those suggested by Councilor Romero are generally compatible with the operation and maintenance of a transmission line, as long as access to structures is preserved and nothing is constructed in the ROW that would reduce conductor-to-ground clearance. Reduced ground clearance would pose a safety hazard to maintenance workers and the public and violate NERC requirements; accordingly, certain restrictions on landowner activities would be included in the ROW agreements. Landowners retain ownership and all other rights to their properties, so permission to develop portions of the ROW for the uses identified by Councilor Romero would need to be negotiated with each affected ROW landowner. Since such activities are not part of Southline's proposed Project or the agencies' Federal actions, they are beyond the scope of this EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
57	21	21.1	–	Stogsdill	9-NEPA	I'm just wondering if your high line is gonna come through congruent with that existing feed line for our area or if you're planning on going to the uh, to some other parcel to route this high line of yours.	BLM provided the requested data on May 30, 2014. The proposed Project and alternatives were described in chapter 2, along with maps of the proposed Project and alternatives, in the Draft EIS.
60	24	24.1	Rafter JL Ranch	Miller	9-NEPA	I do not have a problem with power lines as everyone needs power. I do have a problem with what may come with them, such as solar power plants or alternative power projects, which would take a grazer's grazing leases away for alternative energy. This is why I would prefer the southern route (proponent alternative) down by HWY 9 in New Mexico. This would take the power lines far enough away that they would not be a problem for us from alternative power in the future. If this would be a problem to take the southern route, I would prefer the northern most route (Agency Preferred Alternative)l although this is closer to us and could be a problem with alternative energy in the future.	Previous and pending solar applications were analyzed as a reasonably foreseeable action in section 4.21 of the Draft EIS. Section 4.21 of the EIS has been revised to address the potential reduction in grazing leases from future solar development. Please note that projects, including solar or other generation, proposed on BLM lands would undergo a separate NEPA evaluation, including opportunities for public comment.
62	24	24.2	Rafter JL Ranch	Miller	9-NEPA	There hav already been proposals for solar power to come on to State Land that we lease and we do not want to have problems like that in the future.	Previous and pending solar applications were analyzed as a reasonably foreseeable action in section 4.21 of the Draft EIS. Section 4.21 of the EIS has been revised to address the potential reduction in grazing leases from future solar development. Specific concerns regarding solar projects on state lands should be directed to the State agencies (Arizona State Land Department and New Mexico State Land Office).
138	26	26.1	–	Hatch	9-NEPA	Several of my neighbors were at the meeting and brought to me the distressing news that the route for the proposed Southline Transmission Project high-voltage power line is (despite local input) all but decided to be ran over lands that are in their natural state and home to a HUGE variety of both permanent and migratory endangered fauna and flora – as opposed to a previously "proposed" route that would put this hideous and destructive monstrosity of a high-voltage power line down in the bottom of Sulpher Springs Valley – where the land has already been utterly destroyed by un-successful attempts at farming and is currently criss-crossed by existing power lines.	As discussed in section 1.2.1 of the Draft EIS, BLM and Western will base their respective decisions on the analysis in the EIS. The proposed Project and alternatives are described in chapter 2 of the EIS. The potential effects of the proposed Project on vegetation and wildlife were discussed in sections 3.8 and 4.8 (Biological Resources) of the Draft EIS, including the potential effects from Agency Preferred Alternative on the east side of Willcox Playa.
139	26	26.2	–	Hatch	9-NEPA	Much to my dismay, all of the "maps" I was able to find were pretty much useless in terms of being able to see exactly the routes proposed through our area – because Interstate 10 was (deliberately..??) not marked for reference at all and because no matter how much you magnify the "maps," you can't see the names of ANY local streets or landmarks that would provide useful reference to the exact location of the proposed route	Maps in the EIS have been revised to include more detailed locational information.
140	26	26.3	–	Hatch	9-NEPA	I hereby unequivocally state (as I did at the first Willcox hearing) that ANY proposed route that passes to the East of Interstate 10 (which runs North and South through the Willcox area) is TOTALLY UNACCEPTABLE, due to the catastrophic and permanent damage that would be done to local and migratory endangered species, not to mention the impact of 170 foot tall UGLY metal high-voltage power towers on a view that is currently wild, beautiful and unencumbered. Especially when there is (was..??) a viable alternative route West of Interstate 10 through already irrevocably destroyed and / or poorly developed and abandoned areas	The potential environmental impacts of the proposed Project and alternatives were analyzed in chapter 4 of the Draft EIS, including impacts to wildlife and vegetation (section 4.8) and visual resources (4.11).
143	27	27.2	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	9-NEPA	1. What route specifically will it follow, a map would be wonderful? 2. What will the altitude/height will the towers be at?	The proposed Project and alternatives were described in chapter 2 of the Draft EIS, including maps of the proposed Project and alternatives.
145	27	27.4	New Mexico State University's Unmanned Aircraft Systems Flight Test Center	Zaklan	9-NEPA	4. What is your plan for inspection of the transmission lines once it is complete?	The proposed Project and alternatives, including proposed plans for operation and maintenance, were described in chapter 2 of the Draft EIS.
149	28	28.1	–	Balch	9-NEPA	we own property in Arizona outside of Willcox. Our parcel number is 20316065. I'm just wondering how close this is going to run to our property	BLM provided the requested data on May 14, 2014. The proposed Project and alternatives, including proposed plans for operation and maintenance, were described in chapter 2 of the Draft EIS.
153	31	31.2	Wild Heart Ranch	Lannon	9-NEPA	I appreciate also that they were willing to meet early on with community and environmental groups and to actually listen to them.	Thank you for your comment.
155	32	32.1	EPA	Jansky/Weeks	9-NEPA	EPA rates the DEIS as "EC-2" i.e., EPA has "environmen tal concern s and requests additional information" in the Final EIS (FEIS). The EPA's Rating System Criteria can be found at http:/www .epa.gov/compliance/nepa/comments /ratings.htm l. The "EC" rat ing is based on the potential for adverse impacts to protected species, public health and safety, historic, cultural , or archeological resources, and waters of the U.S. (WUS). The "2" indicates the DEIS does not contain sufficient information to fully assess protected species, noise, public health and safety, prime farm lands, historic, cultural , or archeological resources and WUS. We have enclosed detailed comments which clarify our concerns. Responses to comments should be placed in a dedicated section of the FEIS and should include the specific location where the revision, if any, was made	The EIS has been revised accordingly, and responses to the EPA's detailed comments are provided below.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
156	32	32.2	EPA	Jansky/Weeks	9-NEPA	Alternatives Clarification. Chapter 2; page 117. The potential alignments of the transmission lines in this project are divided into routes, subroutes, segments, and nodes; from largest to smallest respectively. Many of the route segments have multiple nodes which share the same name. For instance, there are 3 nodes of segment LD4 and 2 nodes of segment LD3a. When the existing environment or environmental consequences are being described it is difficult to determine which node is being discussed.	Chapters 3 and 4 of the EIS have been revised to provide more specificity regarding the location of impacts, where appropriate. Additionally, maps in the EIS have been revised to include more detailed locational information.
157	32	32.3	EPA	Jansky/Weeks	9-NEPA	Alternatives Clarification. Also, when describing effects scale is important. Air resources can be affected over many miles or counties, whereas cultural resources may be limited to an exact location. Stating an effect occurs in route segment "P2", when "P2" is over 20 miles long, does not let the reader know exactly where the effect is taking place. This makes it difficult to perform a comparative analysis of every alternative. Recommendation: When describing the environment or effect of the project, consider the scale, and be as exact as necessary in stating the location where the effect is taking place	The potential impact analysis in chapter 4 of the EIS has been revised to include more information, where appropriate, on the scale of impacts.
158	32	32.4	EPA	Jansky/Weeks	9-NEPA	Alternatives Clarification. There is a selection of an environmentally preferred alternative and a listing of the route segments that comprise this alternative. There is also a brief description of why the alternative is more environmentally preferred. Missing from the document is a rationale, e.g. cost, as to why this alternative was not chosen. Recommendation: In cases where the environmentally preferred alternative differs from the Agency Preferred Alternative, explain why the environmentally preferred alternative was not chosen.	Chapter 2 of the Final EIS has been revised to provide more rationale on the selection of the Agency Preferred Alternative and its relationship to the Environmentally Preferred Alternative.
171	32	32.17	EPA	Jansky/Weeks	9-NEPA	Chapter 4; page 1067. The DEIS provides a list of reasonably foreseeable future projects for the upgrade section in Table 421-1 (p. I 067). The DEIS lists the Electrical District 5 - Palo Verde Hub Project, 109 miles in Maricopa and Pinal counties, but does not list the Electrical District 2 to Saguaro #2 Transmission Line Rebuild Project. Recommendation: The FEIS should update the list of reasonably foreseeable projects used in the cumulative effects analysis to include the proposed Electrical District 2 to Saguaro #2 Transmission Line Rebuild Project.	Section 4.21 in chapter 4 of the EIS has been revised to include the proposed Electrical District 2 to Saguaro #2 Transmission Line Rebuild Project as a reasonably foreseeable action.
172	32	32.18	EPA	Jansky/Weeks	9-NEPA	Consultation and Coordination. Chapter 5; page 1126. Coordination with several local, state, and national agencies concerning environmental laws and executive orders is ongoing. Without specifics, and the available opinions of the agencies BLM is tasked with consulting, it is difficult to assess the potential environmental effects of the DEIS. Recommendation: EPA asks that BLM not release the Record of Decision (ROD) until all applicable permits and coordination has been finalized.	The EIS reflects the additional input received from cooperating agencies and the various Federal, State, and local agencies with whom the agencies are coordinating since the Draft EIS was completed, including the comments on and responses to comments on the Draft EIS. Coordination with these entities will continue beyond the EIS and ROD. Permitting entities require detailed project information in order to issue their permits, and in some cases permits are not obtained until filed for by the construction contractor. Southline would need an agency decision, either selection of a proposed Project route if the ROW application is authorized, and/or a decision on Western's participation in the proposed Project, before it could apply for most project permits. Section 1.5.4 of the EIS has been revised to clarify the timing of proposed Project permits.
178	35	35.1	Hearing-USACE	Gatewood	9-NEPA	For the preferred alternative, has there been one major issue that has been identified that has, say, put the preferred alternative in jeopardy?	The Agency Preferred Alternative, and rationale for selection in the Draft EIS, was described in section 2.10.5 of the Draft EIS. Potential avian conflicts at Willcox Playa continue to be a concern for wildlife agencies and the public. As a result, BLM and Western, in coordination with AGFD, developed mitigation measures along segment P7 to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. The mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
179	36	36.1	Hearing	Anderson	9-NEPA	I'm just curious as to what's the purpose of the substation on the border that happens to tack on to the alternative route? If you go with the agency-preferred alternative, would you then be building two substations or just one?	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. The proposed Midpoint South Substation is one of two alternatives for a new proposed substation in New Mexico. See section 2.4.2 of the Draft EIS for a description of substation alternatives, which indicates that only one Midpoint Substation would be constructed.
184	38	38.1	Hearing	No ID Speaker	9-NEPA	Would you show us just where Benson is and J-6 and Nogales. It said Nogales for some reason. Yeah, I didn 't understand the map. Where it says Nogales, why is it Nogales? It's not going down to Nogales. Do you have another map that would show a specific area?	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. The proposed Nogales Substation was described in section 2.4.2 of the Draft EIS. Maps in the EIS have been revised to include more detailed locational information.
185	38	38.2	Hearing	No ID Speaker	9-NEPA	What is the length of that red one? (referring to Alternative H north of Benson)	As described in table 2-8 in chapter 2 of the Draft EIS (now table 2-7 in the EIS), alternative H measures 19.3 miles.
187	38	38.4	Hearing	No ID Speaker	9-NEPA	I missed a lot when you went over the -- This is rebuild, this is new, this is rebuild. So at some point in the evening maybe that could be resaid.	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. Maps in the EIS have been revised to include more detailed locational information.
188	38	38.5	Hearing	No ID Speaker	9-NEPA	It's a matter of language . You're talking substations . We're talking towns and communities. So I don't know where some of these substations are. So it doesn't really make sense to me.	Maps in the EIS have been revised to include more detailed locational information and distinguish between towns and substations.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
189	38	38.6	Hearing	No ID Speaker	9-NEPA	Were you just replacing some poles on that line like last week? (referring to the existing Western line)	Western has an ongoing maintenance program on all of its transmission lines, and replacement of deteriorated poles that fail testing is part of that program. Even though the proposed Project would replace the existing line, it is not certain the proposed Project would be built, and if it is approved, construction is still a few years away. Maintenance of Western's existing line was considered in section 4.21 of the Draft EIS in terms of anticipated cumulative effects.
190	38	38.7	Hearing-Defenders of Wildlife	Sargent	9-NEPA	Can you compare and contrast the purpose and need for Southline versus the purpose and need for SunZia? Could you speak to what the difference in purpose and need is, you know, according to the proponents.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. BLM and Western's purpose and need were described in section 1.2 of the Draft EIS. Southline's objectives in developing the proposed Project were described in section 1.3 of the Draft EIS.
191	38	38.8	Hearing-Defenders of Wildlife	Sargent	9-NEPA	But has BLM looked at any sort of cumulative impact of both lines? (referring to Southline and SunZia)	The cumulative effects of the proposed Southline Project along with other reasonably foreseeable projects, including the not yet constructed SunZia project, in the analysis area were described in section 4.21 of the Draft EIS.
192	38	38.9	Hearing	No ID Speaker	9-NEPA	So there's two different projects. We could have another power line going through another area? (referring to Southline and SunZia)	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project.
193	38	38.10	Hearing	No ID Speaker	9-NEPA	What do you find when you look at the cumulative impacts?	The cumulative effects of the proposed Southline Project along with other reasonably foreseeable projects in the analysis area were described in section 4.21 of the Draft EIS; these are described in the same section of the Final EIS.
194	38	38.11	Hearing	No ID Speaker	9-NEPA	What is the source of the electrical generation and where it starts in Afton?	Section 1.3.1 of the EIS has been revised to clarify that the proposed Project would be a transmission-only project. Southline would not purchase power from generators or sell power to others. The proposed Project, as described in chapter 2 of the Draft EIS, would interconnect with up to 14 existing stations where new or existing power generation resources could interconnect to and utilize the capacity Southline would add to the system.
198	38	38.15	Hearing-Cascabel Working Group	Meader	9-NEPA	One of my big questions was: You're bringing two 345-kilovolt volt lines into the Apache generating station and then you're leaving with just two 230-kilovolt lines . If you're generating a lot of power in New Mexico, how do you accommodate that power past the Apache generating station when you're cutting the transmission capacity in half? And I don't know if that's a question to be answered here .	Section 1.3.1 of the EIS has been revised to clarify that the proposed Project would be a transmission-only project. The calculation of transfer capacity is complex and is not determined solely by the number or voltage of lines entering or exiting a substation. Transfer capability is determined through technical studies that evaluate how a project interacts with the existing system in various conditions. Physical properties, including voltage level and many other factors, are inputs in these studies, but overall capability is determined by the proposed Project's relationship to the overall system. Southline WECC Path Rating studies indicate that the Project can support approximately 1,000 MW in the east-to-west direction across both the New Build 345-kV and Upgrade 230-kV sections, and approximately 400 MW in the west-to-east direction across both the Upgrade 230-kV and New Build 345-kV sections.
199	38	38.16	Hearing-Cascabel Working Group	Meader	9-NEPA	The other question I had is, you can't build a project because it's a good idea. You have to build it because you can make money. And my question was : How many or what level of power purchase agreements do you have to have beforehand to get financing for the project and to justify building the project? It seems a little risky just to go ahead and build this without having some generation all lined up and without utilities having agreed to purchase that. Those are the two big points that I wanted to make . They are more questions than comments I think.	Section 1.3.1 of the EIS has been revised to clarify that the proposed Project would be a transmission-only project; Southline would not purchase power from generators or sell power to others. Instead, power generators or utilities needing transmission capacity would apply for capacity on the Southline Project and pay Southline for the ability to move their power on the line. The proposed Project, as described in chapter 2, would interconnect with up to 14 existing stations where new or existing power generation resources could interconnect to and utilize the capacity Southline would add to the system.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
200	38	38.17	Hearing	Cook	9-NEPA	I'm not sure it's going to be used that effectively. I wanted some interaction. I have some maps here that show where it's going to go in relation to Benson .It appears that one of the routes is going to go pretty much through Benson. I have to guess, but here I am on page 21 of 32. And I can see the legend below and there 's nothing that shows where the proposed line is going to go. I have to assume it's the white and green segmented line . So that appears to go right through our golf course and just north of the interstate. So it looks like I can't have any questions answered; is that the problem with speaking right now?	The commenter is not referring to maps published in the Draft EIS. Commenter was provided with the opportunity to ask questions during public hearing in Benson, Arizona. As described in section 2.7 of the Draft EIS, there are two alternatives near the Town of Benson – upgrading the existing Western line through Benson (segment U2) and an alternative north of the Benson Municipal Airport (local alternative H).
201	38	38.18	Hearing	Cook	9-NEPA	The second one or comment sort of is: It appears that there's a segmented white and green line that's going farther north of Benson and then beyond the airport north of the airport and then coming south following along the railroad tracks and then beyond J-6 crossing, apparently, the freeway. When we get to that portion, I understand that we have very huge power lines much farther north probably around nine or ten miles north of Ocotillo Road, and they present much less of a sight disturbance for us. I wonder why you didn't choose that one but you chose the two that are closer to Benson and more unappealing to us	The commenter is not referring to maps published in the Draft EIS. The proposed Project and alternatives, including Alternatives Considered but Eliminated from Further Analysis (section 2.9) and the Agency Preferred Alternative (section 2.10.5), were described in chapter 2 of the Draft EIS. A description of the rationale for identifying the Agency Preferred Alternative in the Final EIS is included in section 2.10.5.
203	38	38.20	Hearing	Cook	9-NEPA	The following green line was where the one proposed -- I guess your main proposal is. The one that you call H, Alternative H, is your second choice. Now the one that I was referring to that is where the real tall poles, they are even off the map. I'm wondering why you're going so close to our city instead of going so out -- when you can go out of the way and there would be much less visually imposing to everybody or to most people. And if, once you get that far, you can -- it follows along the north end of these mountains and north of Wilcox also and it's out of everybody's way almost. If you follow up Ocotillo Road, that's got to be this one with Benson there. And you count the section lines, one, two, three, four, five, six, seven, it's more like eight, nine, ten, or eleven sections north and it crosses north of Tres Alamos Wash, and it's a huge power line that goes around the south end, south side of the Rincons over here and on the south side of where the Mt. Graham, those mountains, whatever they are. They are out of the way. It's mostly ranch land. You have fewer people to complain about it. It's much less visually imposing . Why are you proposing putting it here rather than out of sight out of mind?	The commenter is not referring to maps published in the Draft EIS. The proposed Project and alternatives, including Alternatives Considered but Eliminated from Further Analysis (section 2.9) and the Agency Preferred Alternative (section 2.10.5), were described in chapter 2 of the Draft EIS. The comment refers to local alternative BE1, an alternative eliminated from further analysis in the Draft EIS (see section 2.9).
204	38	38.21	Hearing	No ID Speaker	9-NEPA	When I started listening to what you were doing, I think maybe part of the dilemma here or the not understanding is that the confusion is that a year ago we had the SunZia lines and they were much bigger, much more impactful . And then how many of you here think that this has to do with SunZia, that it might be the stuff going up to San Manuel and that? Or do we all understand that this is the existing line already? So that was my commenting. Because at first I thought, Well this isn't what we were talking about last time . This is totally different. So maybe that's part of the confusion here.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. The cumulative effects of the proposed Southline Project along with other reasonably foreseeable projects, including the not yet constructed SunZia project, in the analysis area were described in section 4.21 of the Draft EIS.
205	38	38.22	Hearing	Cook	9-NEPA	The Alternative H, is it a viable alternative or is your mind made up to rebuild or upgrade the existing green line?	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD
206	38	38.23	Hearing	Kephart	9-NEPA	I'm from Dragoon, and the existing line crosses my property. You said something about needing an additional 50 feet. Is that the road, the service road, you'll be using? Do you know if the line, not the road?	The proposed Project and alternatives were described in chapter 2 of the Draft EIS. As described in chapter 2 of the Draft EIS, where possible, the new 230-kV line would be built 50 feet away from the edge of the existing 100-foot ROW, parallel to the existing line. Once the old line is removed, the old 100-foot ROW plus the additional 50 feet would equal the new ROW, with the new line ending up offset 25 feet from the center of the new 150-foot ROW. The existing access road would be used along the Upgrade Section; no new access in the existing Western ROW or added ROW is anticipated.
207	38	38.24	Hearing	No ID Speaker	9-NEPA	Would there be lights on the towers?	As described in section 2.4.2 of the Draft EIS, aircraft warning lighting may be required for the conductor on certain spans, in accordance with FAA guidelines. Lighting would typically be required near airports or where low-level military flight paths would cross the proposed Project.
208	38	38.25	Hearing	Lindberg	9-NEPA	Is there a slide that you would show that -- to show the two different pole arrangements that are on that board?	Diagrams of structure types were available as figures 2.3 through 2.12 in the Draft EIS.
210	39	39.1	Hearing	Haenichen	9-NEPA	I'm with the Arizona Governor's Energy Policy Office, and I'm also on the Transmission Line and Siting Committee . I was wondering if there was any rough idea about when this thing might hit the committee	Southline Transmission, LLC, would be responsible for submittal of the application for a Certificate of Environmental Compatibility. BLM and Western are not responsible for ACC submissions.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
211	39	39.2	Hearing	Moffatt/Pima County	9-NEPA	Since you did the 2012 study, Pima County, in cooperation with the airport and the Air Force and a number of entities, have started to relocate Hughes Access Road south of the Raytheon Plant and develop the corridor across Old Vail connection as an industrial corridor. Now, this – the existing line crosses the -- the Summit, which is a community and then crosses Old Vail connection and then across airport property. And it crosses a section of land that is being prepared for industrial development. So one of our preferences, because it pretty much bisects that section of land, is to be able to reroute the line along Old Vail connection, avoid Summit, but also avoid this property, go approximately a mile west and intersect another utility corridor that goes east of the Santa Rita district. So that would be helpful to the airport, to Pima County. And I notice we weren't doing this project, so we didn't have those comments included in your report at that time . But this is a major economic development project for the area, so we'd like to have that considered.	Based on comments by Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. The Agency Preferred Alternative in the EIS has changed since the Draft EIS and now includes route variation U3aPC. BLM and Western continue to coordinate with Pima County.
212	39	39.3	Hearing	Terpering/AZGFD	9-NEPA	I'm Kristin Terpening with Arizona Game and Fish Department. And I was hoping someone can explain to me what went into the decision to align the route on the west side of the Wilcox Playa since it seems to be outside of the Buffalo Soldier Range that I know the DOD needs to consider. Is there someone who can explain that?	The Agency Preferred Alternative, and rationale for selection in the Draft, was described in section 2.10.5 of the Draft EIS. Details on further coordination with AGFD regarding impacts to wildlife habitat in the Willcox Playa area and selection of the Agency Preferred Alternative have been added to chapter 5 of the EIS.
213	39	39.4	Hearing	Mayro/City of Tucson	9-NEPA	I'm Linda Mayro with Pima County. And thank you for considering Tumamoc Hill . Pima County owns the west half of Tumamoc Hill for conservation purposes. And I notice, although it is realigned, it still impacts the National Historic Landmark and our property. It's not in the public right-of-way. So we would consider this, not as desirable perhaps , as the alternative that may go along the east side. But I will put that in comments for you.	As described in chapter 2 of the Draft EIS, there are several options for alternatives around Tumamoc Hill. Alternatives considered in detail in the EIS are described in section 2.7. The Agency Preferred Alternative, and rationale for selection, was described in section 2.10.5 of the Draft EIS.
214	40	40.1	Hearing	No ID Speaker	9-NEPA	What is the process of extending the right-of-way from the existing 100 to 150 when you need it?	The proposed Project and alternatives, including upgrading Western's existing lines and expanding the ROW (see section 2.4.3), were described in chapter 2 of the Draft EIS.
215	40	40.2	Hearing	No ID Speaker	9-NEPA	So there's another major power transmission line that is being proposed along, not the same, but similar location, the SunZia Project, and I was wondering if you could address the relationship . Are they serving some of the same purposes and needs ? So then in the Draft EIS are you looking at the cumulative impacts of both?	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. The cumulative effects of the proposed Southline Project along with other reasonably foreseeable projects, including the not yet constructed SunZia project, in the analysis area were described in section of the Draft EIS.
216	41	41.1	Hearing	No ID Speaker	9-NEPA	What is this going to do? Is it going to go through the City of Willcox?	The potential impact of the proposed transmission line on the physical and human environment, along with a description of mitigation measures and other measures proposed to reduce potential impacts, was analyzed in chapter 4 of the Draft EIS. The location of the proposed Project and alternatives was described in chapter 2 of the Draft EIS; there are several Project alternatives in and around the Willcox area. The Agency Preferred Alternative in the Final EIS is discussed in section 2.10.5.
217	41	41.2	Hearing	No ID Speaker	9-NEPA	Where are the power sources coming from? I've heard Apache. Is that the only power source that this electric line will be providing?	Section 1.3.1 of the EIS has been revised to clarify that the proposed Project would be a transmission-only project. Southline would not purchase power from generators or sell power to others. Instead, power generators or utilities needing transmission capacity would apply for capacity on the Southline Project and pay Southline for the ability to move their power on the line. The proposed Project, as described in chapter 2, would interconnect with up to 14 existing stations where new or existing power generation resources could interconnect to and utilize the capacity Southline would add to the system.
218	41	41.3	Hearing	No ID Speaker	9-NEPA	Then am I to understand that there's no actual power source that you're going to be connected to and, at this time, that you have an actual contract that this is who we 're going to have electricity coming from?	Section 1.3.1 of the EIS has been revised to clarify that the proposed Project would be a transmission-only project. Southline would not purchase power from generators or sell power to others. Instead, power generators or utilities needing transmission capacity would apply for capacity on the Southline Project and pay Southline for the ability to move their power on the line. The proposed Project, as described in chapter 2, would interconnect with up to 14 existing stations where new or existing power generation resources could interconnect to and utilize the capacity Southline would add to the system.
220	41	41.5	Hearing	No ID Speaker	9-NEPA	The other question in the areas where you're looking at non-corridor routes, could you describe in general why those areas were selected and are following existing corridors and what the tradeoffs were in positioning your preferred alternative there.	The proposed Project and alternatives, including routing considerations, were described in chapter 2 of the Draft EIS. The Agency Preferred Alternative, and rationale for selection in the Draft EIS, was described in section 2.10.5 of the Draft EIS. As discussed in section 1.2.1 of the Draft EIS, BLM and Western will base their respective decisions on the analysis in the EIS. The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
221	41	41.6	Hearing	No ID Speaker	9-NEPA	So I know that there's still some concern over part of the SunZia-proposed route and the preferred alternative there. Does this give anymore support to that by adding, "this is in a dual corridor," or are these two totally separate discussions?	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. Additionally, as discussed in section 2.10.5 in the EIS, BLM and Western selected the Agency Preferred Alternative to maximize use of existing and proposed linear ROWs by paralleling existing infrastructure and transmission lines.
222	41	41.7	Hearing	No ID Speaker	9-NEPA	So you said that the new poles will be the single pole with three lines on each side of it. And how much taller are they than the existing poles? And how does that affect how far down the electro magnetic field would reach the ground or how wide the corridor between -- where that goes? And are they -- are they allowed to be kept -- or strung further apart than the existing poles? Are they stronger and therefore able to be fewer of them along the line?	The proposed Project and alternatives, including structure heights, spacing, and dimensions, were described in chapter 2 of the Draft EIS (see section 2.4.2, Project Components). Diagrams of structure types are available as figures 2-3 through 2-12 in the Draft EIS. The potential impact of the proposed transmission line on human health and safety, including impacts from electromagnetic fields, is analyzed in section 4.16 of the Draft EIS.
224	41	41.9	Hearing	Shaver	9-NEPA	I was just going to comment because I'm from Wilcox as well and the -- the map with the playa showing the line going east and south from the playa, there is already a line there. It's a 230 line, and so that -- that corridor they are talking about, that 's not brand new. So it would just widen that I assume, widen that right-of-way and wouldn't probably be taller than the existing Southwest Transco line, would it? I mean it would probably be about the same.	The proposed Project and alternatives, including structure heights, were described in chapter 2 of the Draft EIS. Diagrams of structure types were available as figures 2-3 through 2-12 in the Draft EIS. The proposed Project would parallel the existing SWTC line on the east side of Willcox Playa and as proposed, the structure would be taller. The Agency Preferred Alternative, as described in section 2.10.5 of the Final EIS, would parallel the existing SWTC line.
225	41	41.10	Hearing	Shaver	9-NEPA	Some of you might have thought that that was going to be a new line, but that's already there, so it wouldn't be a new line . And it seems to me that the -- the path using the existing right-of-ways would be less noticeable to those of us who are in the area. Because it would -- it would definitely widen it, and unfortunately for those whose land it crosses, it might widen that right-of-way that you can't build upon. However, following that existing route would minimize the impact, I would think, to our local area. Just kind of a comment.	The proposed Project and alternatives, including structure heights, were described in chapter 2 of the Draft EIS. Diagrams of structure types were available as figures 2-3 through 2-12 in the Draft EIS. Additionally, information on visual resources can be found in sections 3.10 and 4.10 of the Draft EIS.
226	41	41.11	Hearing	Graham	9-NEPA	Jim Graham from Cochise. What's the procedure for compensation for landowners for widening the easement?	The ROW easement acquisition process was described in section 1.9 of the Draft EIS.
228	42	42.2	U.S. International Boundary and Water Commission	Anaya	9-NEPA	If the Proponent Alternative, or any combination of alternatives, include portions on or adjacent to the international boundary , it is required that engineering drawings be submitted to the USIBWC for review and approval prior to beginning any construction near the international boundary. These drawings must show the location of each component in relation to the international boundary and the boundary monuments. The USIBWC requires that all structures be off-set from the international boundary by a minimum of two feet, maintain a clear line-of-sight between any affected boundary monuments, and maintain a 10-foot radius off-set around the international monuments.	Chapter 2, as well as sections 3.7 (Water Resources) and 3.11 (Land Use) in chapter 3 have been revised to describe requirements of the U.S. International Boundary and Water Commission.
230	42	42.4	U.S. International Boundary and Water Commission	Anaya	9-NEPA	Once the proposed project is better defined, we recommend that project specific details be submitted for review and comment by both Sections of the IBWC.	Chapter 2, as well as sections 3.7 (Water Resources) and 3.11 (Land Use) in chapter 3 of the EIS, has been revised to describe requirements of the U.S. International Boundary and Water Commission.
231	43	43.1		Davis	9-NEPA	As a Dona Ana county resident I am against the Southline Transmission Line project.	Statement of preference.
232	43	43.2		Davis	9-NEPA	Having seen your work in the past there is NO regards for environmental impact even though you claim to have had studies which of course have shown NO impact, nor will studies for this project. Impossible! Your construction has no regard for wildlife, flora or fauna, you plow through whatever is in your path and no least intrusive effort is made although such claims are present. Claims for regeneration afterwards are not met. I suggest either use existing lines or negate the effort. As a side topic and as a power user, based on any past related work, this leads to no decrease in our rates	The proposed Project and alternatives, including the no action alternative, were described in chapter 2 of the Draft EIS. The potential impact of the proposed transmission line on the physical and human environment, along with a description of project design features, mitigation measures and other efforts proposed to reduce potential impacts, was analyzed in chapter 4 of the Draft EIS. These potential impacts were also summarized and compared in tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS). As described in chapter 5 of the Final EIS, the BLM and Western invited over 50 local, State, and Federal agencies to participate as cooperating agencies, demonstrating the agencies' commitment to adequately analyzing impacts to the physical and human environment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
233	43	43.3		Davis	9-NEPA	I will ask for you to preserve the environment but this will of course fall on deaf ears as the decision was made long ago. Asking for input is only a formality, any impact studies will be false in pointing to no impact or disregarded.	As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. As described in chapter 5 of the Final EIS, the BLM and Western invited over 50 local, State, and Federal agencies to participate as cooperating agencies, demonstrating the agencies' commitment to adequately analyzing impacts to the physical and human environment. BLM's decisions to be made are outlined in table 1-1. The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. The NEPA process, including publication of the Draft EIS, is designed to disclose potential impacts to the public, as well as solicit and include feedback from the public in the analysis.
237	45	45.3		Foley	9-NEPA	Line placement adjacent to or through these areas should be avoided to the maximum extent possible, and the line should be buried where appropriate. Public access to power line maintenance roads should be restricted so as to prevent the proliferation of unauthorized roads and trails.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS now includes a section on alternative construction methods, such as burying the proposed transmission line.
238	46	46.1		Hamel	9-NEPA	My husband and I have been following the Line Project. We own a small ranch that is located in the middle of a section of this project. I've enclosed 2 maps to show the 2 routes we do not approve of a the route that we would be in favor of. We chose this location because of the 360 degrees beauty of the scenery. The routes proposed will literally ruin our views from every window in our home. We paid a lot of money to have all lines buried on our ranch.	The potential impact of the proposed transmission line in terms of visual resources, as well as property values, was analyzed in chapter 4 of the Draft EIS.
241	46	46.4		Hamel	9-NEPA	On the maps enclosed you can see where Ive indicated our location. The proposed routes to the east + West are the 2 rts. We really do not want. We know you will choose a route in the end. We ask that you choose the 3rd proposed RTE that crosses the I-10 + goes North of us and West up + around us. It will still negatively impact us but to a much lesser degree.	Statement of preference.
242	46	46.5		Hamel	9-NEPA	I wish all these lines could be buried. It would make things so much better.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS now includes a section on alternative construction methods, such as burying the proposed transmission line.
244	46	46.7		Hamel	9-NEPA	As I reread this, Ive come back to add that studying the rest of the route thru town and around the drylake will really ruin the views everywhere thru this valley. Our community is very special we re developing vinyards for wines. We already get lots of tourists for the beauty of this land. This line will ruin it for everyone.	The potential impact of the proposed transmission line in terms of visual resources was analyzed in section 4.10 of the Draft EIS. Additional visual simulations around the Willcox area have been added to appendix K of the EIS.
246	47	47.2	Riley, Carlock, and Applewhite	Loftland	9-NEPA	There were 19 resource reports prepared by the applicant's consultant, CH2M Hill, and ultimately cited to and relied upon in the DEIS by the BLM. 1 These resource reports were not made available on the BLM's project website, or made readily available for public review; thus, we request that the comment period on the DEIS be extended for an additional 30 days after we have received a copy of the above-listed 10 resource reports, and after all 19 resources reports have been made "readily available" for public review.	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
247	47	47.3	Riley, Carlock, and Applewhite	Loftland	9-NEPA	The NOA implies that all supporting documentation, including the resource reports relied upon in the DEIS, would be available online? However, the resource reports are not available. Consequently, inquiries were made with the BLM offices identified above, where hardcopies of the DEIS are located, to determine if there was location for one to review, analyze, and acquire copies of the resource reports; but we were unable to locate any hardcopies of the resource reports, or identify a location where there were readily available for review.the DEIS for the Southline Project As you are no doubt aware, if the BLM references and relies upon materials outside the DEIS, it must do the following: Ensure that the analysis and assumptions in the materials are accurate and can be relied upon in the DEIS. Cite specific page numbers or relevant identifying information to each piece of material referenced and relied upon in the DEIS. Ensure that the materials are made readily available for public review.	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received by the BLM or Western Project contact listed on the Project website. The literature cited style in the Draft EIS was based on Government Printing Office (GPO) publication standards.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
248	47	47.4	Riley, Carlock, and Applewhite	Loftland	9-NEPA	In summary, we request that the BLM provide copies of the resource reports listed on page 1 on this letter. We would prefer an electronic copy (CD or DVD). We likewise request that the comment period be extended to allow us the opportunity to meaningfully consider the resource reports, upon which the analysis in the DEIS is based, before submitting a substantive comment on the DEIS. A minimally appropriate extension would be 30 days after we have received the resource reports. Finally, it would be appropriate for the BLM to clarify to the public that, notwithstanding the NOA, the resource reports, which are supporting materials, are not available online; likewise, the BLM should clarify how other members of the public can acquire copies of the resource reports.	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received by the BLM or Western Project contact listed on the Project website. The length of the public comment period was not extended beyond the original 90-day period.
250	49	49.1	Cascabel Working Group	Meader	9-NEPA	Attached are comments on the Southline Transmission Project from the Cascabel Working Group. I am also attaching four supplementary documents to support these primary comments. These include two examples of No Action Alternative discussions from other EIS's and documentation on two additional renewable energy projects that have been proposed for the project area. I am sending a large scanned map separately because the file size is so large (the Leach Wagon Road). This is not a necessary part of our submission but may interest the EIS contractor given the other historic roads and trails that the DEIS discusses.	Noted.
251	49	49.2	Cascabel Working Group	Meader	9-NEPA	We are concerned about any project that affects the lower San Pedro Valley watershed and the people who live within it, hence our desire to offer comments. Our comments are ordered by section and page in the following discussion. One significant deficiency in the DEIS is the apparent lack of discussion of detailed mitigation strategies, especially regarding impacts upon birds at Willcox Playa. The great strength of the project is its co-location with existing corridors to the maximum extent possible and the reuse of existing right-of-way.	Additional mitigation for vegetation and wildlife was provided by the FWS and is considered in the EIS. Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation. In coordination with the AGFD, the EIS has been revised to consider minor route variations east of the Willcox Playa (P7a, P7b, P7c, and P7d). The AGFD has provided mitigation measures to offset impacts to wildlife habitat and management goals and objectives in their Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
252	49	49.3	Cascabel Working Group	Meader	9-NEPA	Executive Summary. The Executive Summary does not provide a synopsis of the project proponent's objectives. This would seem to be an important component of an executive summary.	The executive summary in the EIS has been revised based on this comment.
253	49	49.4	Cascabel Working Group	Meader	9-NEPA	Executive Summary page xv, line 8. The Governor's Consistency Review is stated for only the state of New Mexico. While Arizona would not undertake a Governor's Consistency Review for resource management plan amendments, would Arizona's Governor not undertake a consistency review for the Final Environmental Impact Statement?	Per the BLM Land Use Planning Handbook (H-1601-1), proposed plan amendments must undergo a 60-day Governor's consistency review prior to final approval. The Arizona Governor would not review the Final EIS.
254	49	49.5	Cascabel Working Group	Meader	9-NEPA	Section 1.3.2 Mitigate Existing Congestion, page 10. References to the need to alleviate transmission congestion on Path 47 in southwestern New Mexico are confusing, as congestion is measured in several ways. The Western Electricity Coordinating Council (WECC) does so in four ways (WECC 2009) 1. Actual flow grouping. For each path, sum the magnitude of all individual U75 and U90 actual flow metrics for all seasons and heavy- and light-load hours. This summed number represents the path-usage ranking number for the path. 2. Actual flow grouping. For each path, identify the highest U75 actual flow metric calculated for each season and heavy- and light-load hours. This maximum number represents the path- usage ranking number for the path. 3. Net Schedule grouping. For each path, sum the magnitude of all individual U75 and U90 net schedule metrics for all seasons and for heavy- and light-load hours. (It was felt this schedule ranking method might produce ranking results similar to the actual flow ranking Method #1.) This summed number represents the path-usage ranking number for the path. 4. Maximum directional schedule grouping. For each path, identify the highest U75, U90 and U99 directional schedule metrics calculated for all seasons and for heavy- and light-load hours. This maximum number represents the path-usage ranking number for the path. By the first three methods, Path 47 is one of these least congested transmission paths in the West. Only by method 4 is the path seriously congested, that is, in terms of west-to-east scheduling. In terms of the path's ability to carry power at peak load, again, the path is uncongested. No physical problems exist in the actual delivery of power. As a 2011 WECC report states2, "Path 47 was not congested in the 2020 expected future study case, or any other cases in the 2010 Study Program." What is at issue here is that El Paso Electric has scheduled all of the west-to-east capacity on Path 47 for its use. The actual physical capacity of the path is not fully used, however. Whether or not this capacity needs to be increased depends largely upon El Paso Electric's future plans for new generation, which the DEIS does not assess. This issue is discussed more fully below.	The proposed Project addresses various regional needs, including Path 47 congestion. As discussed in sections 1.1.1 and 1.3 of the Draft EIS, the purpose of the Project is to improve reliability in southern New Mexico and southern Arizona, mitigate existing congestion, increase the ability to meet the increasing demand for electricity, and facilitate generation and public policy goals by increasing the capacity of the existing electric transmission grid. Thus, the benefits of the proposed Project are broader than just addressing Path 47 congestion. Section 1.3.2 of the EIS has been revised to provide additional clarification on congestion. Please note that Southline is working with WECC to determine the path rating for this proposed Project.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
255	49	49.6	Cascabel Working Group	Meader	9-NEPA	Section 1.3.3, Increase the Ability to Meet Electrical Demand Growth, page 11. One criticism of the Southline Project's objectives is that the use of the project is not directly tied to the projected needs and plans of regional utilities. These needs have not been quantified, nor has the project been proposed and sized according to them. The justification of the project is very general. Assessing these plans seems more critical for the new-build section, as replacing the line in the upgrade section appears necessary given the age and technology of the current line. All regional utilities that might use the new lines have developed integrated resource plans for the next 15 years or more that state how much new generation capacity is needed to meet growth in demand and where those facilities would potentially be sited. The siting of this generation will determine where new transmission capacity needs to be built to access and deliver the power to customers. El Paso Electric has traditionally used the high-capacity lines in southwestern New Mexico (Path 47) to draw power from the Palo Verde nuclear generating station and power plants in the Four Corners area. It is EPE's scheduling of these lines to capacity that has created the apparent congestion on them. The degree to which this scheduling congestion needs to be eliminated is determined by where EPE intends to construct the power facilities needed to meet future projected demand. The company's integrated resource plan3 shows that EPE intends to build nearly 2,500 megawatts of new natural gas capacity by 2031 adjacent to existing facilities in the El Paso area and does not intend to draw increased power from far-distant westerly sources. This brings into question the need to build two new 345-kV lines across this region.	Section 1.3.3 of the Draft EIS discusses the significant growth in southern New Mexico and southern Arizona, which will be accompanied by increased electrical demand. How regional utilities will meet future load growth depends on the availability and cost of various resources, including both transmission and generation. Section 1.3.3 of the EIS has been revised to provide additional clarification on congestion.
256	49	49.7	Cascabel Working Group	Meader	9-NEPA	The other question is whether Arizona utilities intend to build or access new generation in southeastern Arizona or southwestern New Mexico to meet future power needs and whether they will need this new transmission capacity to access the power. Essentially all new conventional generation is slated to be natural gas and sited close to the population centers where it is needed, not far distant from them as has been the practice in the past. Again, this planned siting of new energy facilities brings into question the need to build so much new transmission capacity out of southwestern New Mexico. While the solar energy resources of southwestern New Mexico are highly rated, any area to which this energy might be exported in the Southwest has extremely abundant high-quality solar resources. None of these areas should ever need to import solar energy from such distant sources no matter how rich those sources are. This makes the Southline's use for solar development very uncertain. Southwestern New Mexico's solar resources seem likely to be developed far more slowly than anticipated, if they are ever fully developed at all, which brings into question building so much new capacity to support such development, especially with the SunZia Project targeting the same resources for export. The reduction in transmission capacity by 50% from the upgrade section to the new-build section will seriously limit the amount of eastward transmission of power through the lines. The capacity of the 230-kV lines effectively determines the capacity of the transmission project as a whole, which would leave the 345-kV lines underutilized when the 230-kV section of the project is fully subscribed. This would result in an inefficient use of transmission capacity. Not tying the project specifically to future utility needs and plans in the region and not having the commitment of these utilities to use the project is risky. No attempt has been made to assess these needs and plans and to coordinate the project's use with them. Such an assessment seems essential.	Sections 1.3.1, 1.3.2, and 1.3.3 of the EIS have been revised to provide additional information on congestion, capacity, and the overall objectives of Southline Transmission, LLC. Transmission capacity would not be reduced by 50% from the New Build to the Upgrade sections. The calculation of transfer capacity is complex, and is not determined solely by the number or voltage of lines entering or exiting a substation. Transfer capability is determined through technical studies that evaluate how a project interacts with the existing system in various conditions. Physical properties, including voltage level and many other factors, are inputs in these studies, but overall capability is determined by the project's relationship to the overall system. Southline WECC Path Rating studies indicate the Project can support approximately 1,000 MW in the east-to-west direction across both the New Build 345-kV and Upgrade 230-kV sections, and approximately 400 MW in the west-to-east direction across both the Upgrade 230-kV and New Build 345-kV sections.
257	49	49.8	Cascabel Working Group	Meader	9-NEPA	Conflict with SunZia. While the BLM, WAPA, and both the SunZia and Southline projects have denied that the purpose of the two projects overlaps or conflicts, nevertheless, both will be competing for the same new generation sources in southwestern New Mexico, both will relieve transmission congestion in a similar way in the new-build area, and both would facilitate solar energy development in much the same way. No attempt has been made by either project or either environmental impact statement to assess the degree of overlap in the function of the two projects, that is, how much one may fulfill the function and purpose of the other. Neither can afford to compete with the other for generation sources and the sale of transmission capacity in this area, and they will be doing so. This weakens the financially viability and utilization of both. Not realistically assessing the relationship between the two ignores the physical and economic reality they face and is a major oversight.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21 of the Draft EIS). An assessment of the economic viability of the proposed Project is not within the scope of Western's or BLM's jurisdiction or authority, and is outside the scope of the NEPA process. Regulation of utilities is an authority exercised by States; neither of the agencies has any authority over the actions of public or private utilities. Section 1.4 of the Draft EIS included a discussion of electric transmission regulation and planning.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

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260	49	49.11	Cascabel Working Group	Meader	9-NEPA	Section 2.5, No Action Alternative, Page 112. This is a very weak discussion (or non-discussion) of the No Action Alternative. The discussion of the upgrade portion of the project is adequate and explains what will happen if Southline is not approved, but no discussion of not building the new-build portion is provided. The discussion merely states that the project won't be built and the right-or-way will not be granted. These new lines would be built to meet a foreseeable need. What are the consequences of not meeting that need with this project? More importantly, what are the alternative ways or likely actions that will be used to meet them? Are there potential environmental effects of not building the lines? Public Service Company of New Mexico and, most importantly, the El Paso Electric Company will have considered congestion on Path 47 independently from the SunZia and Southline projects. They will have strategies and plans to address this for themselves without these new merchant transmission projects being built. The discussion of the No Action alternative should include a summary of these alternatives if at all possible. In addition, how might not building the project affect solar energy development? Could SunZia benefit by shifting solar transmission use to that project? I am attaching examples of discussions of the No Action Alternative for the Sunrise Powerlink and Devers 2 projects for reference. They are not applicable to the Southline in several ways, but they may be useful references	As described in section 1.2 of the Draft EIS, the agencies' needs are to address Southline's application for a ROW grant across BLM land and their request to upgrade part of Western's system. Western also needs to make decisions about the nature of its participation in and financing of the proposed Project. WECC is the regional entity responsible for coordinating and promoting bulk electric system reliability in the Western Interconnection (see section 1.4.3 of the Draft EIS). The Draft EIS discusses the no action alternative in chapters 2 and 4. How other entities other entities may be affected commercially by the no action alternative, as well as the commercial and regulatory merits of merchant transmission development, is beyond the scope of a NEPA analysis. The proposed Project intersects the service areas of multiple load serving entities. While each of these load serving entities would consider a range of scenarios by which they could address foreseeable need, the proposed Project would expand their options for meeting customer needs.
261	49	49.12	Cascabel Working Group	Meader	9-NEPA	Section 2.10.6 Environmentally Preferred Alternative, Willcox Playa, pages 143-144. Skirting the Willcox Playa with the project raises perhaps the greatest environmental concern because of abundant birds, especially the daily foraging for food by sandhill cranes in surrounding agricultural fields. This section notes the different between the environmentally preferred alternative and the Agency Preferred Alternative and that the environmentally preferred alternative was not chosen for routing around the playa. The DEIS states the follows: "Routing north (WC1) and west of Willcox Playa (Gb and 10 Gc), it would avoid avian impacts and issues along the southeast side of Willcox Playa (at Proponent 11 Preferred segment P7) and follow the I-10 corridor (WC1)." No reason or explanation is given for not selecting the environmentally preferred alternative. The routing selection will increase the impact upon the birds that use the playa. What were the agency reasons for making this choice? Because this issue is so sensitive, this should be carefully explained.	Chapter 2 of the EIS includes more information on how the Agency Preferred Alternative was selected. Additionally, local route variations have been included in the EIS (P7a, P7b, P7c, P7d, and U3aPC) in response to public and agency comments and concerns about impacts near the Tucson International Airport and Willcox Playa. BLM and Western have worked in coordination with AGFD on development of mitigation measures to offset impacts to wildlife habitat in their Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
262	49	49.13	Cascabel Working Group	Meader	9-NEPA	If the line must go around the playa, the west-side route clearly seems to be the less damaging for birds. First, the line parallels the playa shore for 7.5 miles vs. 11.7 miles. Second, most birds would appear to leave the playa to feed on agricultural fields to the south and southeast, whereas very few agricultural fields occur to the west. The bird traffic into the lines on the east side could be an order of magnitude greater or more. The new 345-kV lines are going to be large and tall with double the number of cables. The steel lattice towers will stand 140' high compared to the existing 230-kilovolt line and poles, which are to remain in place and are probably 80+ feet high. The three transmission cables in the existing line are oriented horizontal with respect to each other, whereas the two sets of three cables for the 345-kilovolt lines will be vertical. This means that birds will have to fly through three layers of cables with the new lines, increasing the potential for collisions. Routing the project to minimize this potential is important. The best west-side alternative route would appear to follow the south side of I-10 through Willcox. I am assuming that the BLM did not choose this because of potential objections from Willcox residents. The other option is to take the lines well north of Willcox, placing them adjacent to TEP's 345-kilovolt lines before turning south, which may be less objectionable. It is strongly recommended that one of these alternatives be chosen.	Additionally, minor route variations have been included in the EIS in response to public and agency comments and concerns about impacts to Willcox Playa. BLM and Western have worked in coordination with AGFD on development of mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
263	49	49.14	Cascabel Working Group	Meader	9-NEPA	Migratory Birds, New Build section, Route Group 2 – Hidalgo Substation to Apache Substation 29, Willcox Playa and Twin Lakes, Pages 326-329. Section 3.11.1 Land Use, State, Willcox Playa Wildlife Area, Page 439. The EIS provides no in-depth mitigation plan for the impact upon birds around the Willcox Playa other than the use of line-marking devices. The discussion of Tumamoc Hill does address impacts somewhat by explaining the routing around the hill. A lack of inclusion of detailed mitigation strategies in the draft EIS seems a deficiency. The SunZia Environmental Impact Statement contains a major section on mitigation measures.	Additional mitigation for vegetation and wildlife habitat was provided by the FWS and AGFD and is considered in the EIS. Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

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265	49	49.16	Cascabel Working Group	Meader	9-NEPA	Table 4-21.1, List of Projects Considered in the Cumulative Impact Analysis, New Build Section, Reasonably Foreseeable Future Actions, Page 1062. Two projects are missing from this list and from the analysis: (1) enXco Development's (now EDF Renewable Energy's) proposed 600-megawatt Afton solar CPS/trough project, and (2) Torch Renewable Energy's 30-megawatt solar photovoltaic project proposed for Allen Flat near Torch's Red Horse 2 wind farm in northwest Cochise County. I am attaching Appendix B from the BLM's Draft Solar PEIS that lists enXco's proposed project.4 I cannot determine whether this project is still being considered. I am also including Torch Renewable Energy's application to Cochise County for its solar project. While Torch's application does not state the size of the project, Unisource Energy's 2014 Integrated Resource Plan5 indicates that it is 30 megawatts (USE intends to purchase the power).	Section 4.21 of the EIS has been revised to include these additional renewable energy projects.
275	56	56.2	Southwest Power Group	Crane	9-NEPA	As I indicated during our conversation, we are requesting that the comment period for the Southline Project be extended 30 days to allow us, and other interested members of the public, the opportunity to review, analyze, and provide comments on the reports relied upon by the BLM in the Southline Project Draft EIS. We previously attempted to secure copies of these reports by contacting the various BLM offices the Notice of Availability for the Southline Project Draft EIS stated would have "supporting documents." However, we were shocked to learn that, despite the requirements of 43 C.F.R. § 46.135 and 40 C.F.R. § 1502.21, the resource reports were not at these locations, or readily available for review by the public.	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many valuable reference documents used in the analysis. Additionally, the reports are supporting information for the EIS, and are not part of the formal review of the EIS; therefore, the agencies were under no obligation to extend the comment period to accommodate review of these documents. Data requested by the public were made readily available as soon as a data request was received by the BLM or Western Project contact listed on the Project website. The length of the public comment period was not extended beyond the original 90-day period.
276	56	56.3	Southwest Power Group	Crane	9-NEPA	I am disappointed that BLM has decided to restrict public access to these important technical resource reports on which the agency has relied in preparation of its Draft EIS. My experience with NEPA had led me to believe that the lead federal agency assumes an obligation to make such materials reasonably available for review during a document comment period such as the one currently under way. I do not believe BLM has made the supporting documents to this Draft EIS reasonably available to the public. Despite the indication in your Notice of Availability of the Draft EIS that such materials were both available and accessible by way of BLM's website specifically established for this NEPA process, our attempts to obtain them have only been met with frustration and undue delays. By not providing these technical resource reports on a timely basis to the public for their review and comment, particularly given BLM's indicated reliance on them for conclusions in the Draft EIS, the agency may well have compromised the intent of NEPA regarding public participation. At your suggestion we visited "Galileo Project, LLC" located at 4700 S McClintock Drive, Suite 100 in Tempe, AZ. We were able to obtain a DVD of the reports and noted that two reports ("Report 15: Vegetation (CH2M Hill 2013a)" and "Report 15: Vegetation (CH2M Hill 2013g)") may incorporate a duplication.	The Southline Transmission Line Resource Reports cited in the draft EIS are some of many valuable reference documents used in the analysis. Data used in the draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS. Data requested by the public were made readily available as soon as a data request was received by the BLM or Western Project contact listed on the Project website. The length of the public comment period was not extended beyond the original 90-day period.
277	56	56.4	Southwest Power Group	Crane	9-NEPA	It is our understanding that CH2M Hill is consultant to the Applicant. Can you confirm that this is indeed correct?	CH2M Hill was retained by the proponent, Southline Transmission, LLC. Chapter 5 of the EIS includes a discussion of the first-party consultant to the Project.
279	56	56.6	Southwest Power Group	Crane	9-NEPA	Once again, given the need to include review of these technical reports as part of providing comments on the Draft EIS, I request that the BLM extend the comment period by an additional 30 days	The Southline Transmission Line Resource Reports cited in the draft EIS are some of many valuable reference documents used in the analysis. Additionally, the reports are supporting information for the EIS, and are not part of the formal review of the EIS therefore, the agencies were under no obligation to extend the comment period to accommodate review of these documents. Data used in the draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS. Data requested by the public were made readily available as soon as a data request was received by the BLM or Western Project contact listed on the Project website. The length of the public comment period was not extended beyond the original 90-day period.
292	60	60.7		Wood	9-NEPA	Please spare the residents of Benson and the folks who live on either side of Benson who will be affected by this project and use alternative route "H" to the north of Benson.	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally, including alternative H, which was described in section 2.7 of the Draft EIS.
300	63	63.1	Friends of Aravaipa Region	Else	9-NEPA	Our interest in the Southline Project is based upon promoting infrastructure improvements that avoid impacts to sensitive environmental lands. Since there are two major electrical infrastructure projects being proposed for siting in southern Arizona at this time, and since both of these projects would compete for generation resources in the overlapping region of southern New Mexico and southern Arizona, FAR is commenting on both projects	Thank you for your comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
301	63	63.2	Friends of Aravaipa Region	Else	9-NEPA	Comment #1- Lack of analysis on the competing and overlapping purposes of the proposed Southline and SunZia projects in the southern portions of New Mexico and Arizona. Although the Western Area Power Administration (Western) must certify that the project is in the public interest (page 8, line 27), there is no analysis in this DEIS of the competitive effect of the proposed SunZia project on transmission demand from generators in the region that are or will be powered by natural gas and renewable resources. Conversely, the SunZia EIS ignored the effect of Southline's competition for generation resources. Western's need to ensure action in the public interest and the BLM's mandate to minimize impacts by considering alternatives to a proposed action require that competing project proposals recognize and analyze the overlap in project purpose. The BLM has avoided making any realistic comparative analysis between the two projects in both of the planning processes, and instead, has left the two projects to compete as a horse race through the regulatory process. This lax approach does not serve the public interest or the BLM' s directives to minimize environmental impacts. This lack of analysis becomes increasingly problematic in light of third-party evidence submitted to the BLM during the SunZia planning process that the Group 1 route segment of the SunZia project (Eastern terminus to the Midpoint substation) is not economically feasible to construct and operate under market conditions projected for the stated construction timetable, thus creating the high probability that both the Southline and SunZia projects would originate and terminate in the same general regions, and closely parallel each other for approximately 100 miles. With a new requirement that SunZia bury portions of the Group 1 route near White Sands Missile Range, the economic feasibility of the so-called wind-first route segment has now become even less attainable in the reasonably foreseeable future. The BLM has not acknowledged this highly probable scenario. With this comment, the high probability of overlap between the two projects is herein reported to the BLM as part of the Southline planning process. The oversight agency has now been informed of this probability by FAR and other organizations during official comment periods and in Information Quality Act submissions on at least twelve occasions. The actual effects of a constructed infrastructure corridor will be obvious. Ignoring the obvious overlap of purpose during the planning process significantly reduces the credibility of the cumulative effects analysis of both projects, and demonstrates the need to take additional measures to ensure that the BLM does not arbitrarily dismiss relevant information during a public process mandated by the National Environmental Policy Act.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration.
302	63	63.3	Friends of Aravaipa Region	Else	9-NEPA	Comment #2- Lack of comparison of the Southline and SunZia projects with regard to the BLM's mandate to co-locate new infrastructure projects with existing linear infrastructure to the highest degree practical. With the two projects overlapping to such a high degree, it is imperative that the common oversight agency (the BLM) present the public and the decision maker with this comparison of co-location, taking into account all analyzed route alternatives of both projects. Although comparisons between the two projects were initiated during the Southline scoping process, this DEIS reflects that comparisons were terminated, apparently at the request of SunZia in their Information Quality Act letter to the BLM of June 1, 2012 (web reference follows): http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information _Resources_ Management/data_ quality.Par.38272.File.dat/SunZia%20Comment%20on%20Southline%20No.%202%20%286-1-12%29.pdf While the Southline proposal has presented a realistic energy development scenario, SunZia has not. In fact, the BLM has claimed that 81% to 94% of SunZia's resultant energy development would be renewable, and has used this assumption as the basis for its analysis of cumulative effects. SunZia's misleading "apples-to-oranges" argument in their above-referenced letter to the common oversight agency should not preclude the highly relevant comparison of environmental impacts between the two proposed projects.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration. Additionally, two alternatives considered in detail in the Draft EIS (as described in section 2.7) include local alternatives DN1 and LD4, which would parallel the selected alternative for the SunZia project. It is outside the scope of authority for BLM or Western to provide oversight to the electrical grid. WECC is the regional entity responsible for coordinating and promoting bulk electric system reliability in the Western Interconnection (see section 1.4.3 of the Draft EIS).
303	63	63.4	Friends of Aravaipa Region	Else	9-NEPA	Comment #3- Current preferred routing around the Willcox Playa. With great concerns regarding the impacts on wildlife in the Willcox Playa region, we incorporate by reference the submitted comments of the Cascabel Working Group. There was no reason provided in the DEIS about why the environmentally preferred alternative was not adopted near the Willcox Playa. This is unacceptable in a region of such high environmental value.	Route variations have been included in the EIS (P7a, P7b, P7c, P7d, and U3aPC) in response to public and agency comments and concerns about impacts to Willcox Playa. BLM and Western, in coordination with AGFD, developed additional mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
304	64	64.1	Aravaipa Property Owners Association	Choate	9-NEPA	Our interest in the Southline Project is based upon promoting infrastructure improvements that avoid impacts to sensitive environmental lands. Since there are two major electrical infrastructure projects being proposed for siting in southern Arizona at this time, and since both of these projects would compete for generation resources in the overlapping region of southern New Mexico and southern Arizona, APOA is commenting on both projects.	Thank you for your comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
305	64	64.2	Aravaipa Property Owners Association	Choate	9-NEPA	(1) Lack of analysis on the competing and overlapping purposes of the proposed Southline and SunZia projects in the southern portions of New Mexico and Arizona. Although the Western Area Power Administration (Western) must certify that the project is in the public interest, there is no analysis in this DEIS of the competitive effect of the proposed SunZia project on transmission demand from generators in the region that are or will be powered by natural gas and renewable resources. Conversely, the SunZia EIS ignored the effect of Southline's competition for generation resources. Western's need to ensure action in the public interest and the BLM's mandate to minimize impacts by considering alternatives to a proposed action require that competing project proposals recognize and analyze the overlap in project purpose. The actual effects of a constructed infrastructure corridor will be obvious. Ignoring the obvious overlap of purpose during the planning process significantly reduces the credibility of the cumulative effects analysis of both projects, and demonstrates the need to take additional measures to ensure that the BLM does not arbitrarily dismiss relevant information during a public process mandated by the National Environmental Policy Act.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)) as its own request. A comparison of the competing and overlapping purposes, and/or potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration. Future generation projects that are not reasonably foreseeable are too speculative to include in the analysis in the EIS.
306	64	64.3	Aravaipa Property Owners Association	Choate	9-NEPA	(2) Lack of comparison of the Southline and SunZia projects with regard to the BLM's mandate to co-locate new infrastructure projects with existing linear infrastructure to the highest degree practical. With the two projects overlapping to such a high degree, it is imperative that the common oversight agency (the BLM) present the public and the decision maker with this comparison of co-location, taking into account all analyzed route alternatives of both projects. Although comparisons between the two projects were initiated during the Southline scoping process, this DEIS reflects that comparisons were terminated, apparently at the request of SunZia. While the Southline proposal has presented a realistic energy development scenario, SunZia has not. In fact, SunZia has claimed that 81% to 94% of its resultant energy development would be renewable, and has used this assumption as the basis for its analysis of cumulative effects.	The not yet constructed SunZia project, and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). A comparison of the competing and overlapping purposes, and/or potential impacts from the not yet constructed SunZia project, is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration. Additionally, two alternatives considered in detail in the Draft EIS (as described in section 2.7) include local alternatives DN1 and LD4, which would parallel the selected alternative for the SunZia project.
307	64	64.4	Aravaipa Property Owners Association	Choate	9-NEPA	(3) Current preferred routing around the Willcox Playa. With great concerns regarding the impacts on wildlife in the Willcox Playa region, we incorporate by reference the submitted comments of the Cascabel Working Group. There was no reason provided in the DEIS about why the environmentally preferred alternative was not adopted near the Willcox Playa. This is unacceptable in a region of such high environmental value.	Route variations have been included in the Final EIS (P7a, P7b, P7c, P7d, and U3aPC) in response to public and agency comments and concerns about impacts to Willcox Playa. BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
310	66	66.2	Volunteer Ecologists	Reichenbacher	9-NEPA	We strongly feel that the Southline Transmission proponents should route the powerline well around Tumamoc Hill. The DEIS (Vol. 1, p. 129) identifies local alternatives TH I A, TH I B, or TH 1C. We urge the proponents to consider these in the strongest terms possi ble. While the alternative routes may affect other Tumamoc globeberry populations , none are the type population for a genus and species and none are now known to be in danger of extinction.	The EIS includes the Agency Preferred Alternative; see section 2.10.5 of the EIS for a description of the Agency Preferred Alternative and the change between Draft and Final EIS. All action alternatives described in section 2.6 of the EIS are considered equally, including local alternatives TH1a, TH1b, and TH1c, which are described in section 2.7 of the Draft EIS.
311	66	66.3	Volunteer Ecologists	Reichenbacher	9-NEPA	If the current preferred alternative is implemented as currently proposed, we would like to offer our services in working with the construction team to ensure that none of the Tumamoc globeberry plants on Tumamoc Hill are affected.	Thank you for the comment and offer of assistance. Chapter 2 (see table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional considerations for Tumamoc globeberry.
312	67	67.1	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	The Department is very interested in working with the BLM, Western, and Southline on developing appropriate mitigation for the Southline Transmission Line Project and requests continued involvement with effectiveness monitoring and adaptive management of that project as necessary. As published in 40 CFR §1508.20, mitigation includes (a) avoiding, (b) minimizing, (c) rectifying, (d) reducing or eliminating, and (e) compensating for environmental impacts.	The EIS has been revised to include additional mitigation, as proposed by the AGFD and FWS, as well as public comments on the Draft EIS (see table 2-8 and chapter 5 in the EIS). The BO and amendment are included in appendix M.
313	67	67.2	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	The primary issues of concern for the Department relate to the Agency Preferred Alternative where it, from the Arizona-New Mexico state line to the Apache substation. Although the preferred route avoids many sensitive resources, it does not avoid the Arizona Game and Fish Department's Willcox Playa Wildlife Area, and more specifically, the sandhill crane roost (Crane Lake) within the Wildlife Area. The Environmentally Preferred Alternative (EPA) described in the DEIS for the Arizona portion is clearly the alternative route posing the least impact to wildlife and habitat, and is therefore the route the Department recommends the BLM and Western select for the Final EIS. The impacts analysis presented in Table 2-12 of the DEIS indicates the Agency Preferred Alternative (APA) poses more impacts to wildlife and habitat than does Proponent Alternative 1 or 2. The Department was unable to compare the APA to the EPA since it was not included in Table 2-12. Additionally, under the APA column of Table 2-12 (page 160), it incorrectly states that Segment P7 is adjacent to the Willcox Playa Wildlife Area; it actually crosses the Wildlife Area and would therefore require Commission approval for a right-of-way.	Route variations have been included in the Final EIS (P7a, P7b, P7c, and P7d) in response to public and agency comments and concerns about impacts to Willcox Playa. BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat and management goals and objectives in the AGFD Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
314	67	67.3	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	The Department is planning enhancement of several wetlands and ponds within the Wildlife Area, most of which are in close proximity to Kansas Settlement Road. Between October and March, Sandhill cranes fly between roosting and feeding sites several times a day. Travel routes vary depending upon a number of variables, including weather patterns, roost conditions, and availability of forage. Within the Sulphur Springs Valley, cranes typically travel between roost sites such as Crane Lake and Whitewater Draw to the many grain fields in the area. To minimize strike hazards for the cranes, the Project would best be sited away from roost and agricultural fields to the maximum extent possible. We recommend investigating a new route alternative that would avoid the Willcox Playa Wildlife Area and move the line out of the crane's daily roost to forage to roost commute. Given our plans to enhance habitat on the Wildlife Area for waterfowl and other wildlife, relocating the Project along Kansas Settlement Road to avoid Crane Lake would only present a new bird strike hazard. Please consider the reroute depicted on the attached map (Attachment A), which follows an existing pipeline and existing roadways. Although this suggested route is adjacent to some agricultural fields, it is farther away from known roost sites and would likely be at a location within the crane's flight paths where the birds are of sufficient altitude that a strike would be very unlikely. This reroute has not yet been assessed in the field and would require the same degree of analysis as all the routes presented in the DEIS. We therefore request further discussion and collaboration with BLM, Western, and Southline on a possible reroute of the Project to avoid the Wildlife Area.	Minor route variations have been included in the EIS in response to public and agency comments and concerns about impacts to Willcox Playa (P7a, P7b, P7c, and P7d). BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat and management goals and objectives in the AGFD Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
315	67	67.4	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	Segment LD4 of the APA would not follow existing facilities and is located in an area currently devoid of any utility infrastructure. It appears the decision to make this segment part of the APA was based upon locating the Southline project adjacent to the proposed, yet currently un permitted, SunZia Transmission Line Project. Making the decision to locate the Southline Project along Segment LD4 in an undeveloped landscape under the guise of co-locating it adjacent to another even larger, yet un-permitted and un-built transmission line is premature and misleading. Therefore, the Department recommends following I-10 which has a "disturbance corridor" and not spread development out to undisturbed habitats.	The comment accurately reflects the description of local alternative LD4. The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally and could be selected in the ROD.
317	67	67.6	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	Also, the Cumulative Impacts section should include the Red Horse Wind and Solar project which is currently being constructed in Allen Flat. Additionally, an assessment on the increased ground water withdraws for additional solar and natural gas fired power plants should be evaluated for their impacts on current activities in the area (e.g. farming, conservation, rural wells, etc.).	Section 4.21 in the EIS has been revised based on this comment, to include the Red Horse Solar and Wind Project. The cumulative effects of past, present, and future actions in the analysis area are considered in section 4.21, including potential impacts to groundwater.
318	67	67.7	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	The DEIS describes residual and cumulative impacts on birds from the Southline project as "increased" due to mortalities from collisions with the transmission line, and it states that any Sandhill crane mortality would be a significant impact. The DEIS claims that with mitigation, impacts on Sandhill cranes would be minor/negligible to moderate and long-term (pg. 764). This mitigation would be accomplished by placing bird diverters, or line marking devices, on the new powerline. The Department disagrees with the effectiveness of this mitigation. Wright et al. (2009) found significant crane mortality from powerline collisions near night roosts in Nebraska. There would be a similar effect at Crane Lake since cranes often come to roost after dark (per. comm. George Hayes; Morkill and Anderson 1991). Various studies list the effectiveness of line marking devices in reducing avian powerline collisions 10-89%; however, they also list high winds and darkness as two factors responsible for many of those collisions. When considering Sandhill cranes in the Willcox Playa area, both windy conditions and night flights apply to their use of Crane Lake. Therefore, in addition to the proposed installation of flight markers, we recommend investigating the use of Bird Strike Indicators (BSis) in select locations as part of adaptive management. BSis would document bird strike frequency and be used in determining whether additional mitigation measures would be necessary. If BSis are not feasible, the Department suggests bird mortality surveys along the line to determine mitigation effectiveness, adjusting visibility markers in areas where most collisions occur. A minimum of two years is recommended, concentrating on November through February when cranes are present.	Minor route variations have been included in the EIS in response to public and agency comments and concerns about impacts to Willcox Playa (P7a, P7b, P7c, and P7d). BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
319	67	67.8	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	In areas where the Project coincides with desert tortoise habitat, we recommend the use of monopole towers. Self-supporting lattice structures provide readily accessible nest substrate and hunting perches for ravens which can have a significant impact on tortoise populations. Reducing these opportunities would minimize impacts to desert tortoises.The DEIS states it will require preconstruction surveys for desert tortoise, Gila monster, and Tucson shovel-nosed snake. The Department also recommends conducting surveys for other sensitive species (e.g. ornate box turtles, Western burrowing owl, Texas horned lizard, kit fox, etc.).	As described in chapter 2 of the Draft EIS, both monopole and lattice structures are being considered for the New Build Section of the Project, while monopoles are proposed for the Upgrade Section. Survey of sensitive species like kit fox, ornate box turtles, etc., have been added as Project design features to chapter 2 of the EIS (see table 2-8). In summary, because desert tortoise habitat is only found in the Upgrade Section, monopoles would be used, as described in chapter 2 of the EIS.
320	67	67.9	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	The Project will result in roads through previously undisturbed habitats. In areas where new access roads would be created, include dip and roll (Zeedyk) design to handle water while drastically reducing erosion potential. Enhancing water-harvesting capabilities of dirt access roads would create water and potentially forage for small birds, herps, and mammals.	Use of water bars as a design feature was included in table 2-7 in the Draft EIS (now table 2-8 in the EIS). Details of the use of water bars and/or rolling dip cross drains would be described in the Stormwater Pollution Prevention Plan.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

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321	67	67.10	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	Compensation Strategies for Impacts For those impacts that cannot be minimized, the Department recommends the following compensation strategies: Cranes l. Providing adequate funding to ensure sufficient water availability at Crane Lake, Whitewater Draw. 2. Remove invasive tamarisk from in and around the Willcox Playa WA and plant native replacement species. 3. Creating new wetlands and roost sites. 4. Funding for long-term food resources. Grasslands l. Grassland restoration through mesquite or creosote removal within the Sulphur Springs Valley or Playa de los Pinos. 2. The purchase of private lands or conservation easements to exclude development and protect grasslands. Roads l. Establish an endowment fund to decommission superfluous dirt roads (for every mile of new access roads, a mile of superfluous road would be restored). Fund would have to cover the costs of identifying those superfluous roads, and all the work involved in identification, public hearings/meetings, landowner meetings, and all the restoration work and monitoring (with contingency actions in place).	Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area, which includes compensatory mitigation. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8. Additional mitigation for vegetation and wildlife, as provided in the BO and amendment from FWS (see appendix M of the EIS for the final BO and amendment), is included in section 2.4.6 of the EIS and considered in the analysis in chapter 4. If during final Project design it is determined that impacts that could not be mitigated through PCEMs and conservation measures in the BO and amendment, then compensatory mitigation would be considered.
322	67	67.11	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	Wildlife Water Catchment in Dial Canyon l. Construction of one or more wildlife watering facilities in areas just outside or adjacent to the Southline. a. The APA passes right next to a Department water catchment in Dial Canyon. We recently invested over $30,000 in renovations to this wildlife water.	Catchment 368 is located approximately 0.20 mile from LD4 and over 3 miles from the Agency Preferred Alternative (LD4-Option 5); no direct impacts to the catchment are anticipated. This catchment has been included as a present project in the cumulative effects section of the EIS (see section 4.21 of the EIS).
323	67	67.12	Arizona Game and Fish Department	Ritter/Francis	9-NEPA	Plan of Development The Department requests involvement in development of the Project Plan of Development (POD). Numerous opportunities exist for a broad range of wildlife and habitat enhancements across many areas of the Project area. We strongly recommend incorporation of adaptive management in the Plan of Development (POD). For example, specific thresholds for percent weed cover within the project ROW would allow for timely actions to be taken. For example, once a pre-determined threshold is reached, it would trigger a specific management action. The Department requests the following Framework Plans be made available with opportunity for comment prior to finalization of the Plan of Development (POD): • Access Road Plan • Plant and Wildlife Species Conservation Measures Plan • Erosion, Dust Control, and Air Quality Plan • Noxious Weed Management Plan • Reclamation, Vegetation, and Monitoring Plan • Avian Protection Plan • Decommissioning Plan Additionally, the Department requests review and involvement in the development of the Bird and Bat Conservation Strategy. We have wildlife management authority in the state of Arizona and should be included in any wildlife conservation strategies that are being developed. USFWS should be involved as well. We suggest including in the environmental training for construction crews that wildlife collisions on construction sites may include small reptiles, amphibians, and mammals not readily visible. Snakes and especially lizards are often attracted to roadways (including dirt roads) and may become casualties during the construction and operation phases of the project if drivers ignore project speed limits or are otherwise non-vigilant about watching for all wildlife when driving project roadways.	A draft POD is available with the EIS for review (see appendix N) and for the Department to provide feedback on. Section 2.4.1 of the EIS has been revised to clarity that agencies like the AGFD would be incorporated into the development of Framework Plans, as appropriate.
324	68	68.1	Pima County	Bernal/Connolly	9-NEPA	As stated in Mr. Huckelberry's letter to you, dated July 2, 2012 (attached), Pima County has several concerns with the proposed Southline Transmission Line Project, a portion of which, commonly known as the 'Rebuild', aims to upgrade and rebuild the existing Western Area Power Administration (WAPA) transmission structures and construct a new transmission line to connect the existing WAPA line and Tucson Electric Power Company's Vail Substation. This 'Rebuild' component of the overall WAPA project will double the existing voltage on the transmission lines from 115 kV to 230 kV, necessitating upgrades to several substations. The overall objective should remain, as much as possible, to locate, upgrade and rebuild the power stations as well as ancillary facilities including staging areas and access roads within the existing WAPA right-of-way and other previously impacted areas.	As discussed in the Draft EIS, the proposed ROW widths have been requested to allow for the movement and operation of construction and maintenance equipment and to allow for sufficient clearance between conductors and the ROW edge, as required by the National Electric Safety Code. Southline is also requesting ROWs for ancillary Project facilities and for access to the transmission line. In certain areas of the Upgrade Section, development and constraints may not allow for the expansion of the existing 100-foot ROW. Additional detail on the location and type of expansions at the existing substations has been included in section 2.4.2 of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
326	68	68.3	Pima County	Bernal/Connolly	9-NEPA	The DEIS makes no mention of mitigation or compensation for the Rebuild's impacts. These lands were secured for conservation and open space purposes due to their exceptional cultural and natural resource values. The County intends to rely on most of these preserves as mitigation lands for our forthcoming Section 10 Incidental Take Permit from the U.S. Fish and Wildlife Service. We recommend Southline mitigate unavoidable natural resource impacts by protecting lands elsewhere in the Conservation Lands System.	Additional mitigation for vegetation and wildlife was provided by the FWS and is considered in the EIS. Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation. Chapter 2 (see table 2-8), as well as sections 3.8.1 and 4.8.1 of the EIS, has been revised to include additional consideration for Pima County Conservation Lands. Disturbance within Pima County Conservation Lands would primarily occur within the Western ROW for the existing line.
327	68	68.4	Pima County	Bernal/Connolly	9-NEPA	Pima County proposes a minor modification to the route of the current WAPA line and the proposed Southline Transmission Line upgrade (see attached Exhibit B, Pima County Strategic Planning). The proposed re-route would re-locate the WAPA and Southline Transmission lines to the west along the northern edge of the Old Vail Connection intersecting with a Unisource utility easement on the east edge ofthe San Xavier District ofthe Tohono O'odham Nation then north to reconnect with the existing WAPA line. This area has been targeted for expansion of Aerospace, Defense, and Technology employment and is a critical component for an industrial corridor from Nogales Highway to 1-10.	Based on comments by and coordination with Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. Route variation U3aPC is also now part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS.
328	68	68.5	Pima County	Bernal/Connolly	9-NEPA	The segment of preferred route would be an impediment to completing the undertakings which are critically important to the region's economic health and affects the Federal Aviation Authority's and the U.S. Air Force's federal interests. Pima County has had preliminary discussions with the San Xavier District regarding the potential re-route and we would welcome the opportunity to partner with BLM,Unisource, WAPA and the Southline Transmission Line proponents to obtain necessary approvals to accomplish this relocation.	Thank you for your comments and willingness to work with Western and the BLM. Based on comments by Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. Route variation U3aPC is also now part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS.
334	68	68.11	Pima County	Bernal/Connolly	9-NEPA	development of FERC vegetative management plans that are sensitive to and retain our unique desert vegetation species;	As described in chapter 2 of the Draft EIS, a Reclamation, Vegetation, and Monitoring Plan will be prepared, along with several other Framework Plans.
339	68	68.16	Pima County	Bernal/Connolly	9-NEPA	Manabendra Changkakoti of our Office of Sustainability and Conservation (520.724.9952; Manabendra .Changkakoti@pi ma. gov) is coordinating the County's involvement with the Southline Transmission Line Project. Please contact him should you have questions, need additional information, or wish to discuss any of the points raised herein	Noted.
341	68	68.18	Pima County	Bernal/Connolly	9-NEPA	Pima County proposes a minor modification to the route of the current WAPA line and the proposed Southline Transmission Line upgrade as shown in Exhibit This proposed re-route would re-locate the WAPA and Southline Transmission lines to the west along the northern edge of Old Vail Connection intersecting with a Unisource utility easement on the east edge of the San Xavier District of the Tohono O'odham Nation then north to reconnect with the existing WAPA line.	Based on comments by and coordination with Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. Route variation U3aPC is also now part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS.
342	68	68.19	Pima County	Bernal/Connolly	9-NEPA	Pima County has had preliminary discussions with the San Xavier District regarding the potential re-route and we would welcome the opportunity to partner with BLM, Unisource, WAPA and the Southline Transmission Line proponents to obtain necessary approvals to accomplish this relocation.	Thank you for your comments and willingness to work with Western and the BLM. Based on comments by Pima County regarding lands south of the Tucson International Airport, a new approximately 6-mile-long route variation (U3aPC) is analyzed in the EIS. Route variation U3aPC is also now part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS.
344	68	68.21	Pima County	Bernal/Connolly	9-NEPA	There are multiple major projects, some of which are in close proximity to the existing WAPA line and proposed Southline upgrade that bisects Section 31. The status of these major projects follows (see Exhibit C): 1. Hughes Access Road Relocation – The FAA will be concluding the Environmental Assessment for this undertaking later in 2014. Construction is expected to start in early 2015 with completion expected by the end of 2015. Pima County will be purchasing Right-of-Way from the Tucson Airport Authority. 2. FAA – Tucson International Airport Parallel Runway Expansion project. The Airport's 5 year master plan update has been approved by the FAA and monies have been appropriated to begin an EIS to initiate the project. 3. USAF – the Tucson International Airport Runway Project necessitates a land swap and relocation of munitions storage bunkers on USAF Plan 44 (Raytheon). The FAA will initiate the Environmental Impact Statement (EIS) in April, 2015. This action will pertain to Parcels F & G on the map. 4. USAF Plant 44 Buffer – In order to rectify some safety arc issues and allow for space for relocation of the above munitions storage buffers as well as possible expansion, additional buffer space will be acquired from the Tucson Airport Authority by Pima County (Parcel H). 5. To rectify limited Munitions Storage Area issues on the 162nd Fighter Wing base on the northern, more populated end of the airport, the east end of Parcel H will be set aside for a new Munitions Storage Area. The lead federal agency for Steps 4 & 5 of the EIS will be the USAF in conjunction with the National Guard Bureau and Pima County.	Section 4.21 in the EIS has been revised based on this comment, to include the projects mentioned both in table 4.21-1 and the analysis of resources in section 4.21.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
345	68	68.22	Pima County	Bernal/Connolly	9-NEPA	Pima County Zoning Code requires a Conditional Use Permit for electrical transmission in certain zoning districts. The Draft EIS states consistency with this requirement but appears to lack the empirical information to back up this assertion.	Section 3.11.1 of the Draft EIS notes that a Conditional Use Permit would be required under certain conditions. Table 4.11-1 of the EIS has been revised to indicate that a Conditional Use Permit would be acquired, as appropriate, to ensure consistency.
350	68	68.27	Pima County	Bernal/Connolly	9-NEPA	Portions of segments U3e and U3f of Subroute 4.1 go through the Tumamoc Hill property; and, segments TH1 Option and TH1a of Route Group 4, Local Alternative are in close proximity, to the north and west of Tumamoc Hill. More detailed comments are provided in other sections of this report.	The comment accurately reflects the description of alternatives in chapter 2 of the Draft EIS.
352	68	68.29	Pima County	Bernal/Connolly	9-NEPA	We recommend subroute 4 local alternative sections TH3- Option A or B to avoid impacts to Tumamoc Hill and Tucson Mountain Park and to greatly reduce impacts to natural resources.	Statement of preference.
354	68	68.31	Pima County	Bernal/Connolly	9-NEPA	The Southline Transmission project proposed to rebuild and upgrade the existing WAPA route through Pima County. The DEIS documents impacts to the Conservation Lands System and to the Priority Conservation Areas for several species, yet mitigation actions for unavoidable impacts to these lands and species are not proposed or are inadequate to mitigate for impacts.	Chapter 2 (see table 2-8), as well as sections 3.8 and 4.8 of the EIS, has been revised to include additional clarification for mitigation for Pima County Conservation Lands. However, the area to be crossed is in an existing ROW for an existing Western line, and the additional impacts from the upgrade of the existing transmission line would occur within that ROW and disturbance area. Little disturbance outside the ROW would be expected to occur in CLS areas. Any additional ROW, if acquired, would be for protective clearance from development at the edge of the ROW and to ensure safe clearance for conductors. If during Project design it is determined that Project facilities would have impacts outside of the existing ROW, compensation for those additional impacts would be considered.
358	68	68.35	Pima County	Bernal/Connolly	9-NEPA	p.xviii Section 4.4 Route Group 4: Pantano Substation to Saguaro Substation Noted that the discussion identifies 10 Local Alternatives, 9 of which intended to avoid Tumamoc Hill. Agency Preferred Alternative includes Local Alternatives TH1a and TH1-OPTION	The comment accurately reflects the description of alternatives in the Draft EIS.
360	68	68.37	Pima County	Bernal/Connolly	9-NEPA	p. xxv in Section 7.8, Lines 15-18: Noted that no resource management plan amendment is needed for Southline upgrade section.	The comment accurately reflects the description of alternatives in the Draft EIS.
361	68	68.38	Pima County	Bernal/Connolly	9-NEPA	p. xxxiv in Section 9, Decisions to be Made section includes a list of land owners/managers that omits Pima County -- please note that while Pima County is a subdivision of the State, it is a separate land owner/manager (the section does mention that County requirements need to be followed).	The executive summary in the EIS has been revised based on this comment.
364	68	68.41	Pima County	Bernal/Connolly	9-NEPA	pp. 68-69, Chapter 2, Access Roads, lines 38 and 4-5: discussion says existing roads will be used "when feasible" with various rights of way widths listed, e.g., 16-24 feet and 30 feet; clams to cause "minimal disturbance" are not supported in the discussion – how will disturbance be minimized?	The referenced section in the Draft EIS in chapter 2 did describe how roads will be designed to minimize disturbance. Strategies would include, as stated on page 69 of the Draft EIS, use of existing roads, either paved or unpaved, minimizing grading to areas where needed to maintain access, etc.
367	68	68.44	Pima County	Bernal/Connolly	9-NEPA	p. 113 Chapter 2, Section 2.6 Action Alternatives:	Noted.
368	68	68.45	Pima County	Bernal/Connolly	9-NEPA	p. 128 Proponent Preferred Route Subroute 4.1 is 100% within the existing Western right of way through Pima County. Of the subroutes developed to avoid Tumamoc Hill, the Proponent and Agency Preferred Alternative includes Subroute 4.1, TH1A, TH1B, and TH1-OPTION.	The comment accurately reflects the description of alternatives in the Draft EIS.
369	68	68.46	Pima County	Bernal/Connolly	9-NEPA	p.129, Local Alternatives: Local alternatives, including 9 selected to avoid or minimize impacts on Tumamoc Hill were developed by Western and Southline. Local alternatives were developed using input from stakeholders.	The comment accurately reflects the description of alternatives in the Draft EIS.
370	68	68.47	Pima County	Bernal/Connolly	9-NEPA	p. 331, Chapter 3, Cultural Resources 3.9 and 4.9: The Agency Preferred Alternative avoids Tumamoc Hill with several Local Alternatives TH1a, TH1-OPTION, rerouting to the west by using Starr Pass, Greasewood, and Anklam Roads to avoid crossing the Hill in the existing Western right of way.	The comment accurately reflects the description of alternatives and the discussion in section 3.9 in the Draft EIS.
388	68	68.65	Pima County	Bernal/Connolly	9-NEPA	Item 1. Section – Executive Summary: ES. 1 Introduction. Page, Line - xiii, 19. Comment: The project will impact areas within Pima County. Pima County should be consulted and included on the preparation of future editions of the EIS. Resolution: Pima County should be a participating agency for further edits, review, etc. of the Environmental Impact Analysis.	As discussed in section 5.4 of the Draft EIS, Pima County was invited to be a cooperating agency.
435	68	68.112	Pima County	Bernal/Connolly	9-NEPA	Staff notes and supports efforts to modify the alignment to the extent that this will reduce direct impacts to historic Tumamoc Hill.	Noted.
436	68	68.113	Pima County	Bernal/Connolly	9-NEPA	Generally, modifications to existing permits or new permits as may be required for electrical substations over 115KV would be coordinated by Development Services Department.	Section 4.11.1 (see table 4.11-1) of the EIS has been revised to provide clarification regarding this comment.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
438	69	69.2	Nature Conservancy	Marshall	9-NEPA	We submitted comments during the scoping phase of this project and appreciate the opportunity to provide brief follow-up comments. Overall, we appreciate the approach taken by BLM to upgrade existing transmission lines where possible, thereby reducing environmental conflicts and minimizing new impacts to areas that currently do not support infrastructure. Our comments are limited to a concern about the preferred alternative identified in Route Group 2 from the Hidalgo Substation to the Apache Substation in southeastern Arizona and on the role of mitigation for offsetting unavoidable and permanent impacts.	Noted.
439	69	69.3	Nature Conservancy	Marshall	9-NEPA	We are concerned about the alternatives that pass along the eastern and southern margins of Willcox Playa. As the DEIS describes, the Playa is a unique feature that maintains seasonal water and supports a large wintering population of Sandhill Cranes, as well as other migratory species dependent on surface water.	Route variations have been included in the EIS (P7a, P7b, P7c, P7d, and U3aPC) in response to public and agency comments and concerns about impacts to Willcox Playa. BLM and Western, in coordination with AGFD, developed mitigation measures to offset impacts to wildlife habitat and management goals and objectives in the Willcox Playa Wildlife Area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
441	69	69.5	Nature Conservancy	Marshall	9-NEPA	Generally, BLM did a thorough job of assessing impacts in the DEIS due to construction and we commend the identification of Best Management Practices and other measures in the DEIS draft Plan of Development as a means of minimizing impacts. However, no measures were identified to offset unavoidable, permanent habitat losses to wildlife throughout the route but especially in new sections proposed and those related to cumulative impacts. If unavoidable, permanent direct and indirect impacts to habitat and species as well as cumulative impacts are not offset, then it is inescapable that the environmental baseline for the region's natural resources will be adversely affected. A diminished environmental baseline raises the prospect of additional species' listings under the Endangered Species Act and the considerable costs, regulatory burdens, and uncertainty that follow.	Additional mitigation for vegetation and wildlife was provided by the FWS and AGFD and is considered in the EIS. Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation.
442	69	69.6	Nature Conservancy	Marshall	9-NEPA	We believe this is an opportunity to apply regional mitigation strategies as described in Order No. 3330 issued by the Secretary of the Interior in 2013 cited in chapter 2 of the DEIS. While we recognize that this approach is still in development, we believe the Southline project fits the purpose and need under which the secretarial order was issued and note that similar strategies are being developed by BLM and partner agencies for Solar Energy Zones in Arizona	Additional mitigation for vegetation and wildlife was provided by the FWS and AGFD and is considered in the EIS. Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation.
451	72	72.3	Mountain View Ranch		9-NEPA	The Proposed "Upgrade" Would Improperly and Impermissibly "Overburden" the Right-Of-Way Granted In the 100' Easement Used by WAPA. WAPA currently operates and maintains a 115 kV single-circuit system in the 100' easement which transects the south portion of Mountain View, with the electric conductors and insulators affixed to "H" shaped wooden supporting structures that are 75' feet in height. The "Upgrade" portion of the Project proposes to replace these facilities with a double-circuit 230 kV system using steel monopole structures 134' (average) in height. In essence, the Project would more than quadruple the electric transmission capacity within the 100' easement, using supporting structures which are at least 59' or 79% greater in height than the existing facilities. Developer/Investor submits that such proposed usage of the 100' easement here in question far exceeds that usage contemplated at the time the 100' easement was granted. As a consequence, the usage contemplated and proposed by the Project would "overburden" both the easement and real property transected by the easement, as well as property directly adjacent thereto or nearby. Such "overburdening" is particularly inappropriate and impermissible when the real properties in question are both currently being used and planned for single-family residential purposes. In that regard, attached as Appendix "C" are copies of two "Contract and Grant of Easement" documents, which together constitute the 100' electric easement used by WAPA for its existing 115 kV single-circuit system that transects Mountain View south of Interstate 10. In Section 1 of each document, the grant of right-of-way in question is for "an electric transmission line," not lines. This limitation is repeated thereafter in each document by references (i) in Section 1 to "said !in," and (ii) in Sections 2, 3, 4 and 5 to "said transmission line." [emphasis added] Clearly, the use of two (2) or more transmission lines with multiple circuits was not contemplated or intended by the grantors of the easement here in question. Nor, presumably was it contemplated by the grantee (United States Department of Interior, Bureau of Reclamation), a sophisticated power transmitting entity, which prepared the easement documents.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.
452	72	72.4	Mountain View Ranch		9-NEPA	The DEIS appears to give no consideration to the concept of "overburdening," and its application to circumstances such as those that would be presented by the presence of the proposed "Upgrade" facilities across single-family residential subdivisions such as Mountain View Ranch and other subdivisions to the west of Mountain View and south of Interstate 10.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
454	72	72.6	Mountain View Ranch		9-NEPA	Comment 6. Accordingly, against this background, the CPUC concluded that that portion of the new transmission system project there in question should be undergrounded, and the costs of such undergrounding spread among all ratepayers who would benefit from the new transmission facilities when completed.2 Succinctly stated, "Infrastructure necessary to fulfill the state's energy goals should not disproportionately burden one community for the benefit of the larger population. "3 When examined within the context of the concept of "overburdening," the similarities between the Chino Hills fact situation and the impact of the proposed Upgrade Facilities on Mountain View and the single-family residential subdivisions located to its west and south of Interstate 10 are quite striking. For example, the proposed Upgrade facilities are intended to serve an alleged "need" which far transcends the current and future requirements for service of Mountain View and other nearby residential communities. In addition, the proposed Upgrade facilities would more than quadruple the electric transmission capacity of WAPA's existing system, just as SCE's proposed double-circuit 500 kV system would more than quadruple the transmission capacity of its then existing 220 kV system. In this instance, the replacement 134' steel monopole towers would almost double the existing 75' supporting structures. In the SCE situation, the increase in tower height was more than doubled, but the 150' right-of-way there was 50% wider than the 100' right-of-way which transects Mountain View and other adjacent single-family residential communities. Thus, the "overburdening" concept is both applicable and appropriate for application in the present situation. Footnotes: 2 Decision No. 13-07-018 at page 21. SCE has since complied with Decision No. 13-07-018, a copy of which is attached as Appendix D. 3 Supra.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.
455	72	72.7	Mountain View Ranch		9-NEPA	In view of the foregoing, Developer/Investor submits that both the Proponent's Preferred Route and the Agency's Preferred Alternative Route should be realigned so as to pass south of Mountain View and the other single-family residential communities located to the west of Mountain View, south of Interstate 10 and west of State Highway 83. In that regard, it appears that at one point in time the Proponent was considering a "potential routing option" that would have crossed State Highway 83 (from east to west) several miles south of Interstate 10 and Mountain View. [See Figure 2-1b (Figure 2-7 Viable Opportunities with Constraints Upgrade Section), page 36 to DEIS]. That "potential routing option" should be reconsidered and adopted at this time.	This potential routing option was considered by BLM and Western (see discussion of TU1 in section 2.9 in the Draft EIS, Alternatives Considered but Eliminated from Further Analysis). As noted, the presence of existing power lines entering and exiting the substation on this alternative would require additional line crossovers that severely compromise future lines from entering and/or exiting the substation and potential future expansion of facility. Rather than resolve, minimize, or reduce resource conflicts, this route substantially complicates the power system in the area.
458	72	72.10	Mountain View Ranch		9-NEPA	As previously discussed in Sections I and II(A) above, WAPA's existing 115 kV single-circuit system is located in a 100' easement which transects that portion of Mountain View located south of Interstate 10. Thus, because of both existing and planned development, as well as the 100' width limitation in the easement itself, there are both developmental and legal constraints upon use of the easement for purposes of constructing, operating and maintaining the contemplated Upgrade Section facilities in this area.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.
459	72	72.11	Mountain View Ranch		9-NEPA	In that regard, the DEIS appears to state that in such circumstances the manner of construction contemplated would be the "tear-down and rebuild-in-place method."6 Assuming solely for discussion purposes that the Project should proceed with the Upgrade Section alignment in this area currently contemplated by both the Project Proponent's Preferred Route and the Agency's Preferred Alternative Route, use of this construction method would clearly have a physical impact on residents of Mountain View and the residential subdivisions to the west of it, in terms of dust, noise, increased transportation and unsightly visual impacts, to name a few. Footnote: 6 DEIS Executive Summary, page xvi, line 43 -page xvii, line I.	The comment accurately reflects the description of alternatives in the Draft EIS. The potential impact of the proposed transmission line on air quality (dust), noise, transportation, and visual impacts was described in chapter 4 of the Draft EIS. As discussed in chapter 4 and summarized in tables 2-11, 2-12, 2-13, and 2-14 of the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS), with respect to impacts to air quality (dust), noise, and transportation, impacts would be temporary.
460	72	72.12	Mountain View Ranch		9-NEPA	In addition, to the extent that WAPA might find that it was in fact necessary to increase the existing right-of-way beyond 100', WAPA would be legally required to provide just and reasonable compensation to impacted landowners, including severance damages.	The ROW easement acquisition process is described in section 1.9 of the Draft EIS. If Western needs to expand the existing ROW, it would seek to negotiate a fair and reasonable settlement and provide just and reasonable compensation to impacted landowners, including severance damages.
461	72	72.13	Mountain View Ranch		9-NEPA	Realignment to Avoid Substantial Adverse Impact Thus, for the reasons discussed in Sections II(B)(I) and II(B)(2) above, as well as the "overburdening" discussion set forth in Section II(A), Developer/Investors submit that both the Project Proponent's Preferred Route and the Agency's Preferred Alternative Route should be realigned so as to pass south of Mountain View and the other single-family residential communities located to the west of Mountain View south of Interstate 10. In so doing, the aforementioned adverse impacts could be avoided.	The potential routing option was also considered by the BLM and Western; see a discussion of TU1 in section 2.9 in the Draft EIS (Alternatives Considered but Eliminated from Further Analysis). As noted in section 2.9 of the Draft EIS, the existing lines and substation would complicate the use of the reroute because of the need for additional line crossovers and would severely compromise future lines from entering or exiting this substation or any future expansion of it. This route does not resolve, minimize, or reduce resource conflicts, and it substantially complicates the power system in the area. Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
462	72	72.14	Mountain View Ranch		9-NEPA	If the Project Is Ultimately Approved and Constructed, the Proponent (and Any Successor-In-Interest) Should Be Required to Utilize the Best Available Technology and Materials to Minimize the Visual Impact of the Electric Transmission Supporting Structures and Conductors. As indicated in the discussion set forth in the preceding sections of these Comments, Developer/Investor believes that the alignment for the Upgrade Section of the Project currently contemplated by both the Project Proponent's Preferred Route and the Agency's Preferred Alternative Route should be adjusted so as to pass south of Mountain View and those single family residential communities located on the south side of Interstate 10 and west of State Highway 83.	Table 2-7 in the Draft EIS (now table 2-8 in the EIS) included non-reflective paint as a Project design feature to minimize the potential visual impacts. The potential routing option was also considered by the BLM and Western; see a discussion of TU1 in section 2.9 in the Draft EIS (Alternatives Considered but Eliminated from Further Analysis). As noted in section 2.9 of the Draft EIS, the existing lines and substation would complicate the use of the reroute because of the need for additional line crossovers and would severely compromise future lines from entering or exiting this substation or any future expansion of it. This route does not resolve, minimize, or reduce resource conflicts, and it substantially complicates the power system in the area.
463	72	72.15	Mountain View Ranch		9-NEPA	However, in the event the project is ultimately approved and constructed, the Proponent (and any successor-in-interest) should be required to utilize the best available technology and materials to minimize the visual impact of the electric transmission supporting structures and conductors. In that regard, it is Developer/Investor's current understanding that there are three (3) types of finish currently available for steel monopole supporting structures similar to those contemplated for the Upgrade Section of the Project. These types of finish are (i) dull galvanized (light gray); (ii) weathering steel (dark brown/rust) and (iii) tainted (epoxy paint). With respect to the electrical conductors, the DEIS indicates that the Project Proponent proposes to ". . . incorporate nonspecular conductors into the Project design to decrease reflectivity and visibility of Project features." [DEIS at page 901, lines 33-34] [emphasis added] Developer/Investor submits that that same design objective should govern the selection and use of finishes for Project supporting structures; and, compliance with such design criteria should be an express condition in applicable approvals for the Project, including a Certificate of Environmental Compatibility ("CEC") from the Arizona Power Plant and Transmission Line Siting Committee ("Siting Committee") and the Arizona Corporation Commission ("ACC"). Footnote: 7 In making this suggestion, Developer/Investor does not intend to suggest that it believes that the Project otherwise qualifies for a CEC for the Project in any form or alignment. That determination is for the Siting Committee and the ACC to make following evidentiary hearings and consideration of various issues, including whether or not there is in fact a "need" for the Project	Southline Transmission, LLC, would be responsible for submittal of the application for a Certificate of Environmental Compatibility. BLM and Western are not responsible for ACC submissions.
464	72	72.16	Mountain View Ranch		9-NEPA	Developer/Investor appreciates the opportunity to submit the preceding Comments on the March 2014 DEIS for the Project. As discussed in Section II(A) above, Developer/Investor submits that use of the 100' electric easement which transects Mountain View south of Interstate 10 for purposes of constructing, operating and maintaining the contemplated Upgrade facilities would constitute an inappropriate and impermissible "overburdening" of both (i) the right-of way which is the subject of those easements and the usage of the same therein contemplated and (ii) residential property adjacent to and nearby the right-of-way.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.
465	72	72.17	Mountain View Ranch		9-NEPA	In addition, as discussed in Section II(B) above, construction, operation and maintenance of Upgrade facilities in the aforesaid 100' easement would have substantial adverse impacts on current and future residents in Mountain View, prospective homebuyers and Developer/Intervenor, as well as residents of other single-family residential communities located south of Interstate l 0 and west of State Highway 83. Accordingly, the alignment for the Upgrade Section of the Project should be adjusted so as to pass south of this area.	As discussed in section 1.1 of the Draft EIS, the existing Western line was constructed in 1951; thus, the line and ROW predate the Mountain View Ranch Subdivision by more than 50 years. The potential impact of the proposed transmission line on property in terms of land use was described in section 4.11.1 and in terms of property value in section 4.15 of the Draft EIS.
466	72	72.18	Mountain View Ranch		9-NEPA	Finally, any applicable approval of the Project should require the use of the best available technology and materials to mitigate and minimize the visual impact of supporting structures and electrical conductors for the Upgrade facilities.	Table 2-7 in the Draft EIS (now table 2-8 in the EIS) includes non-reflective paint as a Project design feature to minimize the potential visual impacts.
467	73	73.1	Sonoita Hills Community Association		9-NEPA	By means of this letter, Sonoita Hills adopts the Comments on the March 2014 Draft Environmental Impact Statement on the Southline Transmission Line Project, which Comments are contemporaneously being submitted by Mountain View Ranch Development Joint Venture, LLC and Mountain View Ranch Investment Joint Venture, LLC.	Thank you for your comments.
468	73	73.2	Sonoita Hills Community Association		9-NEPA	In the aforesaid Comments, there is a reference to and comparison with the circumstances surrounding the July 16, 2013 issuance of Decision No . 13-07-018 by the California Public Utilities Commission ("CPUC"), and the circumstances surrounding the proposed Upgrade Section of the Southline Transmission Line Project as it would impact the Mountain View Ranch Subdivision and other nearby single-family residential communities.	A decision of the California Public Utilities Commission (CPUC) regarding the proposed Upgrade Section of the Southline Transmission Line Project and possible impacts it may have on the Mountain View Ranch Subdivision or other residential communities in Arizona or New Mexico (the location of the project) has no bearing on the EIS process and is beyond the scope of this document.
469	73	73.3	Sonoita Hills Community Association		9-NEPA	In that regard , Sonoita Hills would additionally note the similarity in circumstances between residents of Chino Hills and Mountain View Ranch Subdivision homeowners and property owners who were aware of the existence of 75' tall electric transmission system supporting structures (constructed in the 1940s) at the time they purchased their respective properties, but had no reason to anticipate such structures would thereafter be proposed to be replaced by structures approaching or more than double the height of the pre-existing structures and with additional electrical conductors.	Western will review all of its land rights before construction of upgrade facilities occurs. Where necessary, Western will acquire additional land rights in accordance with Federal law for those easements determined to be insufficient.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
480	75	75.2		Sheehan	9-NEPA	I would also ask that public access to the power lines maintenance roads be restricted to reduce the number of off-road vehicles making trails and damaging vital desert landscapes. Thank you for your consideration.	As discussed in chapter 2 of the Draft EIS, "the proposed Project would be designed, as feasible, to use existing access roads with minimal improvement." Southline would work with landowners to determine what reasonable and legal road restrictions, such as gates, should be put in place.
481	76	76.1	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, ASLD is recognized by the Bureau of Land Management(BLM) and Western Area Power Administration (WAPA) as a cooperating agency (CA) however the memorandum of agreement is not attached to the DEIS. Further, cooperating agencies may have jurisdiction by law and/or special expertise and it appears that the text does not indicate which of these criteria apply to the cooperating agencies listed. The information is relevant in that the cooperating agency eligibility status defines the role, responsibility, and authority of the agency in the EIS process.	The memorandum of agreement between the BLM and Western, and each cooperating agency, is available in the Project Record. As noted in section 5.4 of the Draft EIS, the ASLD is a cooperating agency.
482	76	76.2	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, it appears that the DEIS identifies typical transmission structures that could be used for the proposed Project however it difficult to discern how the structure types vary in their resource impacts.	Estimated temporary and permanent disturbance impacts are generally characterized assuming the maximum extent of physical impact, such as for a lattice tower. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-8. Relevant sections of chapter 4 have been updated to indicate differences in impact types from different structure types, as appropriate.
483	76	76.3	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, it appears that the DEIS does not provide detailed information on the location of new and expanded access roads and affected jurisdiction to evaluate the level of impact to ranchers and other trust beneficiaries.	As a final route has not been selected and the Project has not yet been designed and micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 of the EIS. As stated in the Draft EIS, once design is finalized, all access roads would be surveyed, appropriate ROW would be acquired, and ROW would be mapped and incorporated into the Access Road Plan and Management Plan.
484	76	76.4	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, it appears that the specific locations of project features are generally not provided in the DEIS, nor are the land jurisdictions identified. As such, the potential for creation of remnant parcels on Arizona State Trust land cannot be determined.	Surface ownership (land jurisdiction) was depicted on figures 2-16 and 2-18 in the Draft EIS. Estimated mileage and disturbance by land managing agency were also presented in table 2-8 in the Draft EIS (now table 2-7 in the EIS). The potential for creation of remnant parcels is addressed in section 4.11.1 of the EIS. As a final route has not been selected and the Project has not yet been designed and micro-sited, the location of staging areas and temporary workspaces are not yet known. However, for the purposes of analysis in the Draft and Final EIS, assumptions on feature location and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
486	76	76.6	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, it appears that the location of new and expanded access roads are not detailed in the DEIS and so it is impossible to evaluate the site-specific impacts on resources and whether slopes would exceed 25 percent.	As a final route has not been selected and the Project has not yet been designed and micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
487	76	76.7	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking, it appears that the DEIS does not provide an evaluation of impacts by jurisdiction, including impacts to Arizona State Trust land	Tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) included a comparison of potential impacts by alternatives, as well as information regarding jurisdiction and impacts to State Trust lands.
488	76	76.8	Arizona State Land Department	Ojeda	9-NEPA	ASLD conceptual plans should be discussed in the DEIS. For additional information please contact Tim Bolton, Planning and Engineerig Section at 520-209-4263.	Sections 3.11 and 4.11 of the EIS have been revised to include information on ASLD conceptual planning.
489	76	76.9	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking all potential access roads should be identified by land jurisdiction.	As a final route has not been selected and the Project has not yet been designed and micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
490	76	76.10	Arizona State Land Department	Ojeda	9-NEPA	It is unclear whether the project crosses and or potentially impacts existing non-federal land use plans that apply to land included in the proposed project area. Applicable non-federal plans should also be disclosed given that the proposed project crosses a substantial amount of non-federal land. For additional information please contact Tim Bolton, Planning and Engineering Section at 520-209-4263.	Section 1.5 in the Draft EIS included a discussion of relevant policies, plans, and programs. Local jurisdiction planning needs are discussed in this section. In addition, all relevant land use planning policies and plans were included in section 3.10 (Land Use) of the Draft EIS.
491	76	76.11	Arizona State Land Department	Ojeda	9-NEPA	Generally speaking the DEIS siting constraints does not appear to have considered present and future use of the various Arizona State Trust Land.	Section 4.21 of the Draft EIS included an analysis of known past, present, and future actions, including those proposed on Arizona State Trust lands.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
494	76	76.14	Arizona State Land Department	Ojeda	9-NEPA	The proposed access road width both new and improved is excessive. A blanket approval for this size of road is not a best practices standard. The Arizona State Land Department will require a narrower roadway width in areas sensitive to excessive disturbance.	As a final route has not been selected and the Project has not yet been designed and micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type, road width, and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
495	76	76.15	Arizona State Land Department	Ojeda	9-NEPA	The DEIS should include ASLD's mission statement: "To manage State Trust lands and resources to enhance value and optimize economic return for the Trust beneficiaries, consistent with sound stewardship, conservation, and business management principles supporting socioeconomic goals for citizens here today and generations to come. To manage and provide support for resource conservation programs for the well-being of the public and the State's natural environment." http://www.azland.gov/support/missiongoals.htm	Chapter 5 of the EIS (see Agency Consultation and Coordination) has been revised to direct readers to the respective websites of cooperating agencies to find agency mission statements.
496	76	76.16	Arizona State Land Department	Ojeda	9-NEPA	ASLD right-of-entry permits are included in Table 1-5, but permits and restrictions associated with recreational use of State Trust land merit more discussion.	Information on ASLD's Recreation Permitting Program has been added to section 3.14.2 of the EIS.
497	76	76.17	Arizona State Land Department	Ojeda	9-NEPA	The issuance of a Certificate of Environmental Compatibility via the Arizona Corporation Commission should be reiterated in the "Decisions to be Made."	The Arizona Corporation Commission (ACC) does not have jurisdiction over Western—an agency of the U.S. Government—as it relates to this Project. Western is not required to obtain Certificates of Environmental Compatibility from the ACC on projects involving the upgrade of existing Federal facilities.
498	76	76.18	Arizona State Land Department	Ojeda	9-NEPA	The total length for each sub route is provided, but not by jurisdiction. Text descriptions and tables pertaining to alternatives are also missing details on land jurisdiction.	Tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) included a comparison of potential impacts by alternatives, as well as information regarding jurisdiction and impacts to State Trust lands.
499	76	76.19	Arizona State Land Department	Ojeda	9-NEPA	Detailed information regarding location i.e. land ownership and jurisdiction of Temporary Work Area preparation sites are not specified.	As a final route has not been selected and the Project has not yet been designed or micro-sited, the location of needed construction yards and laydown areas has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions for disturbance are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
500	76	76.20	Arizona State Land Department	Ojeda	9-NEPA	Access road locations, specifications, and jurisdictions should be disclosed as soon as possible so the Department may analyze impacts to Trust Lands.	As a final route has not been selected and the Project has not yet been designed or micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type, road width, and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS). As the proposed Project is designed, coordination with all landowners, including the ASLD, will occur so they will eventually have this information.
501	76	76.21	Arizona State Land Department	Ojeda	9-NEPA	The location of helicopter fly yards is not detailed. Impacts to resources, including cultural resources can also result from temporary use of land by helicopters.	As a final route has not been selected and the Project has not yet been designed or micro-sited, the location of needed access roads has not yet been determined. However, for the purposes of analysis in the Draft and Final EIS, assumptions on road type, road width, and land status are included in the analysis. Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
502	76	76.22	Arizona State Land Department	Ojeda	9-NEPA	The text does not mention whether a fire plan is being prepared as part of the POD.	Section 2.4.1 of the Draft EIS stated that a Fire Protection Plan is a Framework Plan prepared as part of the preparation of the POD.
503	76	76.23	Arizona State Land Department	Ojeda	9-NEPA	When specific geographic or resource features are mentioned as part of the "Transmission Line Route Alternatives", the applicable land jurisdiction tied to the feature is seldom provided which makes it very difficult to assess impacts to Arizona State Trust land.	Section 2.7 of the EIS has been revised to include relevant information regarding land status to these alternative descriptions.
505	76	76.25	Arizona State Land Department	Ojeda	9-NEPA	Because all project features (including access roads, regeneration stations etc.) have not been fully described and their specifications provided it is difficult to verify the ground disturbance estimates in Table 2-8.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
507	76	76.27	Arizona State Land Department	Ojeda	9-NEPA	The DEIS states, "Permanent ROWs for access roads to structure sites are also being requested in order to conduct maintenance throughout Project operation." Please expand on the term "Permanent." For information pertaining to ROW terms/timeframes, please contact Ruben Ojeda, ASLD Right of Way Section at 602.542.2648.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
511	76	76.31	Arizona State Land Department	Ojeda	9-NEPA	The DEIS states, "Southline and its construction contractor would develop a Reclamation, Vegetation, and Monitoring Plan that would guide restoration and vegetation activities for all disturbed lands associated with construction of the Project and its eventual termination and decommissioning. The plan would address all land disturbances, regardless of ownership. It would be developed in consultation with appropriate agencies and landowners and would be provided to these entities for review and concurrence." Considering the term "would" in this statement it's unclear if the proponent will develop one or all of these plans. Please clarify.	Framework Plans, including the Reclamation, Vegetation, and Monitoring Plan, were described in section 2.4.1 of the Draft EIS. The POD and associated Framework Plans would be the responsibility of Southline.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
512	76	76.32	Arizona State Land Department	Ojeda	9-NEPA	The DEIS states, “Special status plants, including the Pima pineapple cactus, would be avoided. Where avoidance is not possible, special status plants would be conserved by relocating plants and/or reseeding, replacing topsoil with existing topsoil that was removed, and regarding in compliance with local ordinances (Pima County). Measures to conserve special status plants would be implemented through the Reclamation, Vegetation, and Monitoring Plan.” Please verify the Special Species status of the Pima Pineapple Cactus as it appears this plant’s status is listed as “Endangered” (see http://www.fws.gov/southwest/es/arizona/Documents/SpeciesDocs/PimaPineappleCactus/NR_PPC_5year_review.p df). Will conservation methods include the purchase of PPC mitigation/conservation bank credits?	The Pima pineapple cactus was discussed in sections 3.8 and 4.8 of the Draft EIS.
513	76	76.33	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 111, Line 40-41;The DEIS states, “A process for requesting and obtaining variances would be included in the final POD, and would include preparation of a Variance Plan. The Variance Plan would detail how requests would be tracked, approved, or not approved, as well as how it would be ensured that the requests have been covered by the analysis in the EIS.” For recordation purposes, the Department may require copies of all requests.	As noted in section 2.4.1 of the EIS, the POD and associated Framework Plans are a requirement of the BLM, and the final POD would need to be approved by the BLM and Western. These plans would incorporate appropriate Federal, State, and local agency guidance and regulation. A draft NEPA POD is included in appendix N of this EIS.
514	76	76.34	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 112, Line 5-7;The DEIS states, “When the variance requested is outside an area covered within the EIS and addressed in the ROW grant, approval from the authorized officer would be required. In these cases, additional environmental analysis may be required.” ASLD needs to be notified and or consulted of any variance request that meets this criterion.	Section 2.4.7 of the EIS has been revised to clarify that the POD and variance process are under the authority of the BLM and Western, and that variances requested on lands not managed by the BLM would require coordination with those agencies and landowners, such as ASLD, separately from the Federal variance process.
515	76	76.35	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 79, No line # mentioned;The DEIS states, “If the Arizona National Scenic Trail must be temporarily closed during construction, an alternate trail route (detour) would be provided during the closure. If it is necessary for trail users to leave the trail during the temporary closure, trail users would need to obtain permission from the ASLD.” If a detour is necessary and the detour is to be on Arizona State Land then, additional detail will be necessary to ensure disturbance is contained to one authorized route and not a series of newly created trails. Also, reiterating the Departments recreational permit in this section would be helpful.	Sections 3.14 and 4.14 (Recreation) in the EIS includes additional permitting and restrictions associated with recreational use of State Trust land, including detour needs for Arizona National Scenic Trail closures.
516	76	76.36	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4; Page 63-64, No line # mentioned; Please provide the ASLD ROW number(s) for the existing substations (Adams Tap, Pantano and Tortolita) located on Arizona State Trust Land.	As a final footprint for proposed substation expansion areas has not been selected, the affected ASLD ROW numbers are not known as of this publication date.
517	76	76.37	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4 page 140, Line 26-27; Please provide landownership percentage for both ASLD and NMSLO.	As a final route has not been selected and the Project has not yet been designed and micro-sited, the total acreage of surface ownership is an estimate only. Assumptions on land status are included in the analysis in the Draft EIS. As stated in the Draft EIS, once design is finalized, all access roads would be surveyed, appropriate ROW would be acquired, and ROW would be mapped and incorporated into the Access Road Plan and Management Plan.
518	76	76.38	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 512, Line 15; Please provide the ASLD ROW number for the 115 acres of State Land within the Willlcox Playa Wildlife Area.	As a final footprint for proposed Project has not been selected, the affected ASLD ROW numbers are not known as of this publication date.
519	76	76.39	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 485, Line 16; Please provide the ASLD ROW number for the 115 acres of State Land within the Willlcox Playa Wildlife Area.	As a final footprint for proposed Project has not been selected, the affected ASLD ROW numbers are not known as of this publication date.
521	76	76.41	Arizona State Land Department	Ojeda	9-NEPA	Vol 1 of 4, Page 439, Line 15 - 16; Please provide the ASLD ROW number for the 115 acres of State Land within the Willlcox Playa Wildlife Area.	As a final footprint for proposed Project has not been selected, the affected ASLD ROW numbers are not known as of this publication date.
522	76	76.42	Arizona State Land Department	Ojeda	9-NEPA	Vol 2 of 4, Page 628, no line # mentioned; It is unclear how the proponent will notify the ASLD and or its leaseholders of any required blasting.	As discussed in section 2.4.1 of the Draft EIS, a Blasting Plan would be prepared as one of several Framework Plans associated with the POD. Section 2.4.1 of the EIS has been revised to clarify that as part of the development of the Blasting Plan, Southline would work with agencies like ASLD to develop notification procedures, etc.
523	76	76.43	Arizona State Land Department	Ojeda	9-NEPA	Vol 3 of 4; Page F-18, no line # mentioned; It is not clear whether the Applicant has committed to implementing both standard mitigation measures as well as selective mitigation measures as part of the project. If yes, then should they also be listed as “design features?” Would additional mitigation measures be required by the BLM/Western and other agencies to address residual impacts?	Relevant sections (executive summary, as well as sections 2.4.6, 3.8, and 4.8) of the EIS have been updated to clarify proposed vs. committed mitigation.
524	76	76.44	Arizona State Land Department	Ojeda	9-NEPA	In POD, Page 8-2, Table 8-1; In order to legally access Arizona State Trust Lands a Right of Way applicaton or a Right of Entry instrument must be issued by the Department. Please contact Ruben Ojeda, Rights of Way Section for further information related to access upon State Trust Lands.	Noted. Thank you for your comment.
526	77	77.1		Linderg	9-NEPA	For the safety and general well being of the residents of Benson, AZ and the folks who live on either side who will be affected by the project, please seriously take into account the following. In order to avoid; A) Destruction of property and vegetation (mine) during construction of higher replacement structures (poles if you wish) with double the wires and double the voltage and B) The hazards associated therewith and C) Conflict of placement of new structures to one side or the other of existing structures where the lines fall on property line, as in my case and D) Increased easement ROW reducing usable property (also mine) of landowners, and E) The eyesore this represents to the community, I strongly suggest you take alternate route H to the North of Benson. It appears that lines already exsist on part if not all of proposed alternate H.	The potential impact of the proposed transmission line on land use and property, including residential properties, vegetation, public health and safety, and visual resources, was described in chapter 4 of the Draft EIS. The proposed Project, including Project design features and best management practices, was described in chapter 2 of the Draft EIS. The Agency Preferred Alternative in the EIS has been modified since the Draft EIS (see section 2.10.5 of the EIS); however, alternative H is not part of the Agency Preferred Alternative.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
527	77	77.2		Linderg	9-NEPA	No doubt the population of Benson has increased since 1952 increasing the afforementioned problems associated with using the exsisting line location through Benson. Common sense says avoid populated areas as much as possible. Alternate H is the best solution.	Changes in population in the Benson area were described in section 3.15 of the Draft EIS. As discussed in section 1.2.1 of the Draft EIS, BLM and Western will base their respective decisions on the analysis in the EIS. The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally.
528	78	78.1	Coalition For Sonoran Desert Protection	Campbell	9-NEPA	Proposed Mitigation for Impacts to the Sonoran Desert Conservation Plan The proposed Southline Transmission Line Project has numerous potential and serious impacts to lands under the umbrella of Pima County's Sonoran Desert Conservation Plan (SDCP), including the Conservation Lands System (CLS), critical Sonoran Desert wildlife habitat, threatened wildlife linkages, and rare riparian areas. We disagree with the contention in the DEIS that most of these impacts do not warrant adequate and appropriate mitigation. If these impacts cannot be avoided first and foremost, the Southline Transmission Line Project should be required to fully mitigate for all of its impacts. Where appropriate, local mitigation policies, such as those for Pima County's CLS, should be adhered to fully.	Chapter 2 (see table 2-8), as well as sections 3.8.1 and 4.8.1, of the EIS has been revised to include additional consideration for Pima County Conservation Lands. Disturbance within Pima County Conservation Lands would primarily occur within the Western ROW for the existing line.
545	78	78.18	Coalition For Sonoran Desert Protection	Campbell	9-NEPA	We also encourage further analysis and consideration of burying the transmission line in critical wildlife corridors if this would produce fewer disturbances than what is currently proposed. This would, of course, have to also involve active restoration of ground disturbance activities after the project is complete.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to include a section on alternative construction methods, such as burying the proposed transmission line. Burying a transmission line causes more physical disturbance than aboveground lines and causes greater impacts to critical wildlife corridors. Additionally, the cost of burying the transmission line would be prohibitively expensive and financially infeasible.
548	79	79.1	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	9-NEPA	It appears that the BLM did an excellent job engaging the public in order to identify proposed transmission line routes and utilizing this information to develop alternatives.	Thank you for your comment.
549	79	79.2	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	9-NEPA	However, there were almost too many alternatives to review and compare, making it difficult to evaluate them and the often the text and figures and tables did not correspond one-to-one. For instance, Figure 2-16, which provides an overview of the transmission line route and substation alternatives considered in detail does not list segments Pl , P2, P3, P4a or P7. These segments instead are simply labeled as the agency preferred/proponent preferred alternatives on the Figure although in the text of the document they are referred to as P l, P2, etc.	The length and complexity of the proposed Project and alternatives make presentation of information clearly and simply a challenge. The BLM and Western rely on agency and public input on the Draft EIS to provide suggestions; these comments are considered herein. Maps in the EIS now include more detailed locational information.
550	79	79.3	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	9-NEPA	Not including the labels on the Figure makes it harder for the reader to review the DEIS/Draft RMPA The BLM may want to consider whether there is a simpler way to present the different alternatives or whether the Figures can be revised to better reflect the text.	Maps in the EIS now include more detailed locational information.
554	79	79.7	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	9-NEPA	Furthermore, it appears that an amendment to the Mimbres Resource Management Plan (MRMP) would not be required under the Agency Preferred Alternative, although this was not particularly clear, depending on which section I read. For example, on page 145, the draft EIS/draft RMPA states that no plan amendment wou ld be required for the Agency Preferred Alternative. Yet, on page 1059, Lines 31-41, the draft EIS/draft RMPA states that under Route Group 2 Local Alternatives, segments LD2 and LD3a cross VRM Class II BLM-managed lands and the proposed plan amendment would reclassify 86.1 acres of VRM Class II land s to VRM Class III lands. Upon examination of the different Figures provided, it appears that only one portion of LD3a would intersect with VRM Class II lands, but not the portion that is part of the Agency Preferred Alternative. This information really cannot be gleaned from the text; one has to rely on the figures showing the transmission line routes.	As stated in the EIS (see section 2.10.8), no amendment to the Mimbres RMP would be required for the Agency Preferred Alternative. Section 2.10.8 in chapter 2 of the EIS has been revised for clarity.
567	80	80.5		Magruder	9-NEPA	Rights-of-Way (ROW). In general, the preferred proponent alternative makes extensive re-use of the existing transmission line ROW, and thus meets the "first law of transmission siting," that is, to use what exists before creating a new ROW. This approach creates considerably less environmental impacts and is strongly supported. The minor proposed changes from the existing ROWs and the new ROWs in New Mexico have acceptable environmental impacts.	The comment accurately reflects the analysis provided in the Draft EIS.
581	81	81.1	U.S. Bureau of Reclamation	Taylor	9-NEPA	I am writing to ask if there is a possibility of your granting the Bureau of Reclamation an extension to provide comments on this DEIS. I am still checking with staff here on whether or not we will actually have comments. I realize this is short notice, but if it is possible, we'd appreciate the opportunity to provide comments.	The length of the public comment period was not extended beyond the original 90-day period. BLM and Western note that Reclamation did not ultimately provide any comments.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
582	82	82.1	SunZia	Wray	9-NEPA	As written, the Purpose and Need Statement for the BLM is too conclusory, and does not adequately explain the need to be addressed by the proposed action. Rather, it is merely a recitation of the BLM's general obligations under the FLPMA.	Chapter 1 in the EIS has been revised to clarify the BLM's multiple-use mandate under the FLPMA and provide information on the BLM's mission, which provides context for the BLM's purpose and need.
583	82	82.2	SunZia	Wray	9-NEPA	As written, the BLM should consider as part of its alternatives all possible uses of the right-of-way, and not simply consider alternative configurations of the transmission line. Stated differently, the Purpose and Need Statement is so broad, it does not meaningfully justify limiting the alternatives analysis or provide a basis for eliminating any alternatives.	As described in section 2.9 of the Draft EIS, BLM and Western were aware of, and involved in, Southline's extensive pre-NEPA routing efforts and are knowledgeable regarding why other routes were eliminated. After further review of constraints and other routing possibilities, the agencies did not identify any viable major new routes that had not been previously reviewed by Southline; they did, however, identify local alternatives and route variations around particular resource issues. Chapter 1 in the EIS has been revised to clarify the BLM's multiple-use mandate under the FLPMA and provide information on the BLM's mission, which provides context for the BLM's purpose and need. BLM and Western developed alternatives in collaboration with the cooperating agencies listed in chapter 5. Alternatives were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback.
584	82	82.3	SunZia	Wray	9-NEPA	The Purpose and Need Statement for Western is misleading, as it implies the upgrades to the Saguaro–Tucson and Tucson–Apache 115 kV transmission lines under consideration will be identical whether Western participates in Southline or upgrades the lines themselves. If Western upgrades these lines it is likely that the nature of the upgrades will be starkly different than the upgrades proposed by the Southline Project. The Purpose and Need Statement should disclose that if Western does not participate in the Southline Project, the nature and extent of the upgrades to these lines will differ, including an identification as to how such upgrades will differ, as reflected by Western's "FY14 Ten-Year Appropriated Capital Program" (dated October 23, 2013).	Sections 1.2.2 and 2.5 have been revised in the EIS to indicate the difference in timing between the proposed Project and Western's plans in the FY14 Ten-Year Appropriated Capital Program. The no action alternative was analyzed in detail in chapter 4 of the Draft EIS.
585	82	82.4	SunZia	Wray	9-NEPA	Failure to Make the Resource Reports Readily Available for Review for the Entire Comment Period violates NEPA. Notably absent from the Draft EIS, and the appendices thereto, are the 20 resource reports completed by Southline's consultant, CH2M Hill. These resource reports were incorporated by reference in the introduction for each resource identified in Chapter 3, Affected Environment. For example, on page 189, Section 3.2 Air Quality, "The information provided in the following subsections is taken from a report titled 'Southline Transmission Project Resource Report 01: Air Quality and Climate Change' (CH2M Hill 2013a). The contents of that report are used herein without specific reference."	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Additionally, the reports are supporting information for the EIS, and are not part of the formal review of the EIS; therefore, the agencies were under no obligation to extend the comment period to accommodate review of these documents. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request. The literature cited style in the Draft EIS was based on Government Printing Office (GPO) publication standards.
586	82	82.5	SunZia	Wray	9-NEPA	If the BLM or Western references and relies upon materials outside the Draft EIS, it must do the following1: • Ensure that the analysis and assumptions in the materials are accurate and can be relied upon in the Draft EIS. Footnote: 1 See e.g., 43 C.F.R. § 46.135; 40 C.F.R. § 1502.21 ("No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment.")	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received. The literature cited style in the Draft EIS was based on Government Printing Office (GPO) publication standards.
588	82	82.7	SunZia	Wray	9-NEPA	Ensure that the materials are made readily available for public review.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
589	82	82.8	SunZia	Wray	9-NEPA	Accordingly, we request that BLM and Western correct the Draft EIS to meet these three criteria. The following 20 resource reports are not readily available for public review, notwithstanding the fact that their review is necessary for public vetting and to provide a complete evaluation and understanding of the analytical conclusions on the potential environmental impacts associated with the construction and operation of the Southline Project included in the Draft EIS: • CH2M Hill. 2013a. Southline Transmission Project Resource Report 01: Air Quality and Climate Change (V2 Report). April 22, 2013. • CH2M Hill. 2013b. Southline Transmission Project Resource Report 08: Noise (V2 Report). April 22, 2013. • CH2M Hill. 2013c. Southline Transmission Project Resource Report 04: Geology and Minerals (V2 Report). April 2, 2013. • CH2M Hill. 2013d. Southline Transmission Project Resource Report 12: Soils (V2 Report). March 28, 2013. • CH2M Hill. 2013e. Southline Transmission Project Resource Report 09: Paleontology (V2 Report). March 28, 2013. • CH2M Hill. 2013f. Southline Transmission Project Resource Report 17: Water Resources (V2 Report). March 28, 2013. • CH2M Hill. 2013g. Southline Transmission Project Resource Report 15: Vegetation (V2 Report). May 31, 2013. • CH2M Hill. 2013h. Southline Transmission Project Resource Report 18: Wildlife (V2 Report). June 3, 2013. • CH2M Hill. 2013i. Southline Transmission Project Resource Report 02: Cultural Resources (V2 Report). May 28, 2013. • CH2M Hill. 2013j. Draft Southline Transmission Project Resource Report 16: Visual Resources (V2 Report). May 17, 2013. • CH2M Hill. 2013k. Southline Transmission Project Resource Report 07: Land Use (V2 Report). March 28, 2013. • CH2M Hill. 2013l. Southline Transmission Project Resource Report 03: Farmlands and Rangeland. March 27, 2013. • CH2M Hill. 2013m. Southline Transmission Project Resource Report 19: Military Operations (V2 Report). March 28, 2013. • CH2M Hill. 2013n. Southline Transmission Project Resource Report 13: Special Designations. March 28, 2013. • CH2M Hill. 2013o. Southline Transmission Project Resource Report 10: Recreation (V2 Report). March 28, 2013. • CH2M Hill. 2013p. Southline Transmission Project Resource Report 11: Socioeconomics and Environmental Justice (V2 Report). April 22, 2013. • CH2M Hill. 2013q. Southline Transmission Project Resource Report 06: Health and Human Safety (V2 Report). May 16, 2013. • CH2M Hill. 2013r. Southline Transmission Project Resource Report 05: Hazardous Materials and Waste (V2 Report). March 28, 2013. • CH2M Hill. 2013s. Southline Transmission Project Resource Report 14: Transportation (V2 Report). April 2, 2013. • CH2M Hill. 2013t. Southline Transmission Project Resource Report 20: Cumulative (V2 Report). April 10, 2013.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received.
591	82	82.10	SunZia	Wray	9-NEPA	Additionally, there is serious doubt that the resource reports were appropriate documents to be “incorporated by reference,” and instead should have been included in the appendices. Because the resource reports are substantive documents prepared specifically by Southline for the Southline Draft EIS, and form the basis for the baseline upon which impacts are analyzed by the BLM and Western, they should have been included in the appendices. See e.g. Council for Environmental Quality (“CEQ”), Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question 25, 46 Fed.Reg. 18,026, 18,034 (Mar. 23, 1981)2; 40 C.F.R. § 1502.18 Footnote 2: Specifically, CEQ, in its Forty Most Frequently Asked Questions guidance states the following with respect to use of materials outside of the EIS, and inclusion of the materials in the appedices versus incorporation by referene.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data requested by the public were made readily available as soon as a data request was received.
592	82	82.11	SunZia	Wray	9-NEPA	Appendices were prepared and circulated with the Draft EIS, and since the resource reports are indisputably “material prepared in connection with an environmental impact statement,” they should have either been included in the appendices or have been readily available for “the full minimum public comment period,” i.e. the 90-day comment period. However, the resource reports were not readily available, as evidenced by the fact that it took SunZia nearly 2 weeks and several contacts with the agency to secure a complete set of the resource reports. Further, the complete set of resource reports were not received by SunZia until 3 days before the close of the comment period.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
593	82	82.12	SunZia	Wray	9-NEPA	The comment period should be re-opened, at the very least, and the resource reports be made readily available by placing all the resource reports in the Draft EIS appendices.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request.
594	82	82.13	SunZia	Wray	9-NEPA	Inclusion of the resource reports in the appendices, and provision of the same to the public for review during the entire comment period, is more than mere formality. The purpose of an EIS is to inform decision-makers and the general public of the environmental consequences of a proposed federal action. NEPA's purpose would be defeated if a critical part of the analysis is omitted from an EIS and its appendices.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request.
595	82	82.14	SunZia	Wray	9-NEPA	At the very least, if incorporation by reference of the resource reports were appropriate, the resource reports should have been described in the body of the EIS, pursuant to 40 C.F.R. § 1502.21, in sufficient detail. The cursory descriptions provided in the Draft EIS did not fulfill the purpose of the EIS because the substance of what was incorporated is an important part of the environmental analysis.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. The information in chapter 3 and analysis in chapter 4 of the EIS have been revised based on public comments on the Draft EIS. Sufficient detail is provided to disclose the potential effects of the proposed Project.
596	82	82.15	SunZia	Wray	9-NEPA	Summarily, the resource reports have not been made reasonably available for review, and thus the ability to review and comment on the Draft EIS, including the analysis it relies upon, has been unnecessarily constrained and the purpose of NEPA has been defeated. SunZia assumed, based on the language in the NOA, that these reports would be available on the Southline BLM Project website. After discovering the reports were not available on the project website, we contacted each of the BLM offices identified in the NOA as having a hardcopy of the Draft EIS. None of these offices had copies of the resource reports readily available for public review. Finally, we sent a written request for copies of these reports, and after considerable effort we were able to acquire 9 of the 20 resource reports from Galileo Project, LLC, a previously undisclosed BLM and Western contractor, on June 27, 2014. Attached are a series of email communications and a copy of a letter dated June 25, 2014 from Ryley Carlock & Applewhite documenting the extensive efforts required to acquire copies of these resource reports, demonstrating that these reports were not "readily available" for public review during the entire comment period. Because the comment period was scheduled to close on July 10, 2014 and we only received 9 of the 20 reports on June 27, 2014, we requested that the comment period be extended for another 30-day period and that all of the reports be made immediately available for public review. Both requests were denied. With the confirmation that the BLM refused to make the resource reports generally and readily available for public review, on July 3, 2014, we requested copies of the remaining 11 resource reports that we did not pick up from the Tempe, Arizona office of Galileo Project, LLC on June 27, 2014. Due to the BLM and Western's extensive reliance on the data found in the additional 11 resource reports prepared by Southline's consultant, it became critical for us to review this data in order to understand the affected environment and thus the Southline Project's potential environmental impacts described in the Draft EIS. As instructed by Senior National Project Manager Mark Mackiewicz on July 3, 2014, we picked up the additional 11 resource reports from Galileo Project, LLC. These reports were not made available for pick up until July 7, 2014, only 3 days before the comment deadline.	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request to the BLM or Western Project contacts listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Conclusions in the EIS are independent of data and conclusions in the Southline Transmission Line Resource Reports.
597	82	82.16	SunZia	Wray	9-NEPA	BLM's decision to not provide reasonable access to the resource reports, which describe methodologies, data and analyses specific to the Southline Project, for the entire length of the comment period has resulted in a Draft EIS that cannot be fully publicly reviewed and vetted pursuant to NEPA. BLM has declined to extend the comment period to allow additional time to review these otherwise unavailable resource reports, or post them on the BLM's publicly accessible website for review by potentially affected communities and interested stakeholders. We restate our request that was previously denied that all 20 resource reports be made immediately available for public review, and that the comment period be extended for 30 days to allow review and comment on the same. Despite our limited time to review the resource reports that were not readily available, we were able to draw some general conclusions about the data prepared by the Southline's consultant, CH2M Hill (see Section III. Southline Transmission Project Resource Reports of this letter).	The Southline Transmission Line Resource Reports cited in the draft EIS are some of many valuable reference documents used in the analysis. Data used in the draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request. The length of the public comment period was not extended beyond the original 90-day period.
598	82	82.17	SunZia	Wray	9-NEPA	Section 5.8 of the Draft EIS identifies technical support staff utilized in the preparation of the Draft EIS, but does not disclose their qualifications or specializations that are necessary to ensure a scientific rigor throughout the NEPA process.	Section 5.8 of the EIS includes additional information on the expertise, experience, and professional disciplines of the people primarily responsible for preparing the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
599	82	82.18	SunZia	Wray	9-NEPA	Furthermore, identification and qualifications of individuals responsible for the 20 resource reports3 that were heavily, and seemingly exclusively, relied upon for resource-specific descriptions of the affected environment (Chapter 3 of the Draft EIS), and their associated environmental consequences (Chapter 4 of the Draft EIS) were not provided. As discussed in the previous section of this letter, CH2M Hill, Southline's consultant, prepared all 20 resource reports that were used to establish the baselines in the Draft EIS. Therefore, CH2M Hill should have been disclosed in the list of preparers. See e.g. Id.; Sierra Club v. Marsh, 714 F. Supp. 539, 550 (D. Me. 1989) amended, 744 F. Supp. 352 (D. Me. 1989) aff'd, 976 F.2d 763 (1st Cir. 1992) ("The federal agencies' reliance on these Booz–Allen reports is a sufficient basis upon which to conclude that those reports are 'significant background papers' and that Booz–Allen should have been listed in section 9 of the EIS.").	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
600	82	82.19	SunZia	Wray	9-NEPA	The Draft EIS relies heavily upon these 20 resource reports. While the agency may consider materials provided by Southline and its consultants, it is under an obligation to independently evaluate the information prior to its use and inclusion in the Draft EIS. See e.g. 40 C.F.R. § 1506.5; Utahns for Better Transp. v. U.S. Dep't of Transp., 305 F.3d 1152 (10th Cir. 2002) as modified on reh'g, 319 F.3d 1207 (10th Cir.2003) (Specifically, the Corps' failure to verify the cost estimates supplied by the project Applicant was a violation of NEPA.); Van Abbema v. Fornell, 807 F.2d 633 (7th Cir. 1986).	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many valuable reference documents used in the analysis. Information on the independent review process is available in the Project Record. Chapter 5 of the EIS has been revised to include additional information on the authors of the Southline Transmission Line Resource Reports and the independent evaluation process used prior to referencing the reports in the Draft EIS.
601	82	82.20	SunZia	Wray	9-NEPA	Consequently, the list of preparers of each of the 20 resource reports should have been identified and such a list should have been included in the information required by 40 C.F.R. Sec. 1502.17.	Information on the independent review process is available in the Project Record. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
602	82	82.21	SunZia	Wray	9-NEPA	The Draft EIS likewise should have disclosed what "independent evaluation" the BLM and Western conducted with respect to each of these 20 resource reports. There is grave concern that given the BLM's refusal to make these reports readily available for public review, or to include them in the appendices of the Draft EIS, that a meaningful independent review of these reports was not conducted by BLM and Western.	Information on the independent review process is available in the Project Record. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS. Chapter 5 of the EIS has been revised to include the independent evaluation process used prior to referencing the reports in the Draft EIS. Data requested by the public were made readily available as soon as a data request was received.
603	82	82.22	SunZia	Wray	9-NEPA	Furthermore, the fact the Draft EIS did not identify which BLM and Western employees conducted an independent review calls into question what, if any, meaningful independent evaluation was conducted.	Information on the independent review process is available in the Project Record. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
604	82	82.23	SunZia	Wray	9-NEPA	We request that the Draft EIS be reissued with (1) an updated list of preparers of the resource reports, with the information outlined herein and (2) a description of the independent evaluation the BLM and Western conducted on all 20 resource reports.	Information on the independent review process is available in the Project Record. Chapter 5 of the EIS has been revised to describe the independent evaluation process used prior to referencing the reports in the Draft EIS. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
605	82	82.24	SunZia	Wray	9-NEPA	We also request that the public be afforded an additional 30 days to review and comment on the resource reports and the efficacy of BLM's and Western's independent evaluation of the information in these reports. This would satisfy the requirements of 40 C.F.R. Sec. 1502.17, and allow the public to understand if there has been a violation of 40 C.F.R. § 1506.5.	The length of the public comment period was not extended beyond the original 90-day period. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request to the BLM or Western Project contacts listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html).
606	82	82.25	SunZia	Wray	9-NEPA	The Analysis of Alternatives Does not Analyze a Reasonable Range of Alternatives. The range of alternatives for the Upgrade Section of the proposed Southline Project has been unnecessarily limited, which is inconsistent with CEQ and BLM regulations. The range of alternatives has been limited, in part, because the Purpose and Need Statement for Western impermissibly narrows the range of reasonable alternatives. Specifically, the Upgrade Section alternatives considered in the Draft EIS have been limited to new transmission lines that could be built adjacent to existing Western transmission lines. Other reasonable alternatives that would be technically feasible have not been addressed in the Draft EIS, and there is no supporting documentation or rationale to conclude that these alternatives should be eliminated.	As described in section 2.9 of the Draft EIS, BLM and Western were aware of, and involved in, Southline's extensive pre-NEPA routing efforts and are knowledgeable regarding why other routes were eliminated. After further review of constraints and other routing possibilities, the agencies did not identify any viable major new routes that had not been previously reviewed by Southline; they did, however, identify local alternatives and route variations around particular resource issues. Alternatives were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Alternatives analyzed in the Draft EIS represent a full range of reasonable alternatives. Local alternatives in the Upgrade Section considered in detail in the Draft EIS include alternative H near Benson, the Tumamoc Hill alternatives (TH1 and TH3), and MA1 (see sections 2.7.3 and 2.7.4 in the Draft EIS). A route variation is considered in Upgrade Section in the EIS (U3aPC). The purpose and need for Western (see section 1.2.2 in the Draft EIS) did not limit alternatives to new lines that would be built adjacent to existing Western lines.
607	82	82.26	SunZia	Wray	9-NEPA	In order to achieve full compliance with the CEQ and BLM regulations, we request additional analysis of a reasonable range of alternatives to be added to the Upgrade Section.	Alternatives analyzed in the Draft EIS represent a full range of reasonable alternatives. Additional route variations are being considered in the EIS (sections 2.6 and 2.7 of the EIS) in response to comments on the Draft EIS (P7a, P7b, P7c, P7d, and U3aPC).

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
608	82	82.27	SunZia	Wray	9-NEPA	As stated in Section 2.2.1 of the Draft EIS, the "Upgrade Section was designed as double-circuit 230 kV in order to maximize the existing ROW as much as possible." However, the project description requires that the ROW be expanded to 150 feet to accommodate the proposed new system, and would require construction of a new double-circuit 230 kV transmission line in an adjacent ROW that is 125 feet wide, providing a 25-foot-wide overlap. Clearly this plan would not maximize use of Western's existing 100-foot-wide ROW, but would require additional ROW that is larger than the existing ROW.	As described in chapter 2 of the Draft EIS, in locations where possible, the new 230-kV line would be built 50 feet away from the edge of the existing 100-foot ROW, parallel to the existing line, for a total of 150 feet. Only 50 feet of new ROW would be needed, where possible. See also figure 2-15b in the Draft EIS.
609	82	82.28	SunZia	Wray	9-NEPA	The additional ROW would require condemnation and removal of existing homes in the Tucson area (e.g., 30 single-family residences in the Drexel subdivision adjacent to the Western's 100- foot-wide ROW).	This comment is incorrect. Only 50 feet of new ROW would be needed, and that only where possible. It is likely that no additional ROW would be acquired between Del Bac and Rattlesnake substations. See also figure 2-15b in the Draft EIS. Additionally, no homes would be removed as a result of the proposed Project. The ROW easement acquisition process was described in section 1.9 of the Draft EIS. Potential impacts to residential property were analyzed in chapter 4 of the Draft EIS.
612	82	82.31	SunZia	Wray	9-NEPA	As described in Section 2.9 of the Draft EIS, the Routing Study conducted for the Southline Transmission Line Project was conducted by Southline, and thus required independent review by BLM and Western before it could be relied upon. There is no indication such review occurred, nor disclosure of which employees of BLM and Western conducted such independent analysis, as required by 40 C.F.R. § 1506.5. We request the Draft EIS be supplemented to correct this deficiency.	Information on the independent review process is available in the Project Record and described in section 2.6.1 of the Draft EIS (see Alternatives Developed by the Bureau of Land Management and Western Area Power Administration). Section 2.9 of the Draft EIS indicates that BLM and Western were involved in the process used to evaluate Southline's routing process. Specifically, "BLM and Western were aware of, and involved in, Southline's pre-NEPA routing efforts and are knowledgeable as to why other routes were eliminated. After further review of constraints and other routing possibilities, the agencies did not identify any viable major new routes that had not been previously reviewed by Southline; they did, however, identify local alternatives around particular resource issues."
613	82	82.32	SunZia	Wray	9-NEPA	As stated, "Southline's routing process (Southline 2012a) included an extensive screening of route options throughout the routing study area that were ultimately dropped from consideration. Although those routes are not described in this section (2.9) as they were part of Southline's pre- NEPA screening process, it is worth noting that those alternatives were considered and eliminated due to environmental and technical constraints, pre-NEPA stakeholder outreach, and early discussions with BLM and Western, detailed in the project routing report." In the Routing Study, it was noted that "because no additional existing transmission lines offered viable opportunities for upgrading between Apache and Saguaro substations, the study focused on the existing Western and SWTC lines."4 There is no supporting rationale in the Draft EIS to explain why the study area was constricted to exclude viable siting opportunities within the area located east of Tucson and north of Interstate 10 between the Apache and Saguaro substations. We request this supporting rationale be provided in a supplemented Draft EIS for public review. Footnote: 4 SWTC – Southwest Transmission Cooperative	Considering comments on the study area considered by Southline in their pre-NEPA routing efforts is out of the scope of this Project. Information on the independent review process is available in the Project Record and described in section 2.6.1 of the Draft EIS (see Alternatives Developed by the Bureau of Land Management and Western Area Power Administration). Route variations are being considered in the EIS in response to comments on the Draft EIS and to resolve specific concerns near Willcox Playa and south of Tucson International Airport (P7a, P7b, P7c, P7d, and U3aPC).
614	82	82.33	SunZia	Wray	9-NEPA	Other reasonable alternatives to Southline's proposed new transmission lines for the Upgrade Section include viable opportunities that would meet the purpose and need for the Southline Project, although they were not considered in the Draft EIS for the proposed double-circuit 230 kV line(s). Several other routes should be considered for the Southline Project as alternatives in the Upgrade Section, so that reviewers may evaluate their comparative merits. These include, but are not limited, to the following: • existing SWTC 115 kV transmission line corridor in Cochise and Pinal counties between the Apache Power Plant, Winchester Substation, San Manuel Substation, Oracle Substation, and Saguaro Substation	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. The alternative proposed here does not meet the objectives of the proposed Project, which is to connect to the existing substations along the Upgrade Section of the project; see section 2.9 of the EIS, which has been revised to clarify this.
615	82	82.34	SunZia	Wray	9-NEPA	Other reasonable alternatives to Southline's proposed new transmission lines for the Upgrade Section include viable opportunities that would meet the purpose and need for the Southline Project, although they were not considered in the Draft EIS for the proposed double-circuit 230 kV line(s). Several other routes should be considered for the Southline Project as alternatives in the Upgrade Section, so that reviewers may evaluate their comparative merits. These include, but are not limited, to the following: *existing Tucson Electric Power ("TEP") 138 kV and Western 230 kV lines located within the Pantano Wash and the Rillito River corridors in Tucson	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Information on the independent review process is available in the Project Record and described in section 2.6.1 of the Draft EIS (see Alternatives Developed by the Bureau of Land Management and Western Area Power Administration).

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
616	82	82.35	SunZia	Wray	9-NEPA	Other reasonable alternatives to Southline's proposed new transmission lines for the Upgrade Section include viable opportunities that would meet the purpose and need for the Southline Project, although they were not considered in the Draft EIS for the proposed double-circuit 230 kV line(s). Several other routes should be considered for the Southline Project as alternatives in the Upgrade Section, so that reviewers may evaluate their comparative merits. These include, but are not limited, to the following: *proposed SunZia Southwest Transmission Project corridor (BLM preferred alternative Subroute 4C2c) between the Winchester Substation and the Saguaro Substation in Cochise, Pima, and Pinal counties	As described in section 2.9 of the Draft EIS, BLM and Western were aware of, and involved in, Southline's extensive pre-NEPA routing efforts and are knowledgeable regarding why other routes were eliminated. After further review of constraints and other routing possibilities, the agencies did not identify any viable major new routes that had not been previously reviewed by Southline; they did, however, identify local alternatives and route variations around particular resource issues. Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to describe these proposed alternatives.
617	82	82.36	SunZia	Wray	9-NEPA	These transmission line corridors were not identified as alternatives considered in the Southline Draft EIS, and no rationale for eliminating these alternatives was documented in the Draft EIS.	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to describe the proposed alternatives.
618	82	82.37	SunZia	Wray	9-NEPA	The BLM and Western have an obligation to develop and evaluate a reasonable range of alternatives, and cannot simply rely upon information provided by Southline. See e.g. Van Abbema v. Fornell, 807 F.2d 633 (7th Cir. 1986) (holding that the agency violated NEPA because it failed to adequately consider economics of and alternatives to the proposed action before issuing a permit, and failed to meet its responsibility to verify in reasonable way data on which it relied). Because the Draft EIS is silent about the rationale for eliminating alternatives, one cannot meaningfully understand or react to this impermissible narrowing of the range of alternatives. The Draft EIS should be reissued with such an analysis, and a comment period should be allowed for reaction and comment on the same by the public.	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Alternatives analyzed in the Draft EIS represent a full range of reasonable alternatives, as described in section 2.7. Additional route variations are being considered in the EIS (see sections 2.6 and 2.7 of the EIS). Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to further describe these proposed alternatives and the rationale for dismissal.
619	82	82.38	SunZia	Wray	9-NEPA	New ROW will be required to accommodate the proposed 230 kV transmission lines parallel to the existing Western 115 kV line, although conflicts with residences or other sensitive land uses would likely occur along any of these alternative routes. No evidence of those alternatives being eliminated for environmental and technical constraints was included in the Draft EIS, and we request that this work be performed in a supplemented Draft EIS	The ROW easement acquisition process was described in section 1.9 of the Draft EIS. Potential impacts to the physical, human, and natural environment were analyzed in chapter 4 of the Draft EIS. Alternatives considered but eliminated from further analysis were described in section 2.9 of the Draft EIS.
620	82	82.39	SunZia	Wray	9-NEPA	The description of the proposed Southline Project component design is provided in Section 2.4.2 of the Draft EIS, and included in Table 2-2, Typical Design Characteristics for the Proposed Upgrade Section 230 kV Transmission Line. The Upgrade Section would require six conductors installed on new tubular steel poles, with typical span lengths between 700 and 1,000 feet, within a 150-foot-wide ROW. As shown in Figure 2-12 (below), the new 230 kV structures would be approximately 134 feet tall, nearly twice as tall as the existing 75-foot 115 kV H-frame wooden poles. The existing 115 kV poles and conductors would be removed following construction of the new 230 kV lines, and the future disposition and use of alternatives for the remaining 75-foot existing Western easement are not disclosed. This is a material omission to the analysis that we request be corrected.	The commenter misunderstands section 2.4.3 of the Draft EIS, which described the upgrade of the existing Western 115-kV line. As described in this section in the Draft EIS, only an additional 50 feet of ROW would be required. This section of the EIS has been revised for added clarity and to include details on the potential use of outages on the line.
621	82	82.40	SunZia	Wray	9-NEPA	The new double-circuit 230 kV transmission line project is defined as an "upgrade" to Western's existing 115 kV transmission line system in order to meet Western's need to adequately operate their electrical system and to qualify for federal funding under the Hoover Act. Yet, Western's "FY14 Ten-Year Appropriated Capital Program" (dated October 23, 2013) reported the dates when such "upgrades" would in fact be needed by Western to adequately operate their electrical system. Note that these segments comprise the proposed Southline Upgrade Section between Apache and Saguaro substations. The upgrade described by Western is a single 230 kV line: Saguaro-Tucson 115-kV Rebuild Phase 1 – FY18 Apache-Tucson 115-kV Rebuild Phase 1 – FY19 Apache-Tucson 115-kV Rebuild Phase 2 – FY20 Apache-Tucson 115-kV Rebuild Phase 4 – FY21 Southline proposes to place a double-circuit 230 kV transmission line in-service between Apache-Tucson-Saguaro substations (thereby replacing Western's existing 115 kV line) during 2016: fully five years in advance of Western's much less extensive upgrade to a single 230 kV line.	Section 2.5 (the no action alternative) has been revised in the EIS to indicate the difference in timing between the proposed Project and Western's plans in the FY14 Ten-Year Appropriated Capital Program.
622	82	82.41	SunZia	Wray	9-NEPA	However, for purposes of environmental analysis, the so-called "Upgrade Section" is a physically complete, separate, and new transmission line. It should not be defined as an "upgrade" of the existing 115 kV line. As evidenced by public comments, members of the public have been misled to interpret the Upgrade Section as a replacement of the existing 115 kV poles within the existing ROW, when in fact a separate and much larger double-circuit 230 kV transmission line project would be constructed using substantially larger and new ROWs.	As described in chapter 2 of the Draft EIS, in the Upgrade Section of the proposed Project, the new 230-kV line would be built 50 feet away from the edge of the existing 100-foot ROW, parallel to the existing line, for a total of 150 feet. Only 50 feet of new ROW would be needed, where possible. See also figure 2-15b of the Draft EIS. Section 1.1.1 of the EIS has been revised to clarify the additional requested ROW; however, please note that some areas would not need additional ROW (i.e., between the existing Del Bac and Rattlesnake substations). The term upgrade is correct for lines that increase voltage, use taller structures, and require more ROW.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
623	82	82.42	SunZia	Wray	9-NEPA	Understandably, there is confusion regarding the Upgrade Section of the Southline Project, and the impacts to property owners. These facts have not been fairly and adequately disclosed to the affected general public	The ROW easement acquisition process was described in section 1.9 of the Draft EIS. Section 1.1.1 of the EIS has been revised to clarify the additional requested ROW. As noted in section 2.4.1 of the EIS, no new ROW is anticipated between the Del Bac and Rattlesnake substations in the Upgrade Section of the proposed Project. Please note that on the whole, a review of the comments received on the Draft EIS did not indicate that commenters were having difficulty understanding the document or the proposed Project.
624	82	82.43	SunZia	Wray	9-NEPA	An alternative upgrade to Western's existing 115 kV transmission lines through the Tucson area could be achieved within the existing ROW, to some degree, in addition to building the new 230 kV lines in either separate, or adjacent ROWs. Separation between the two, 230 kV circuits would provide a higher level of reliability, allowing for the loss of only one of the two circuits in the event of a disruption, failure or corridor outage. We request that this alternative upgrade be analyzed in a supplemental Draft EIS.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to respond to these proposed alternatives.
625	82	82.44	SunZia	Wray	9-NEPA	Finally, alternatives to the construction of new transmission lines that could meet the Southline Project's objectives should be considered. These include, for example, (1) other existing system upgrades, (2) demand side management, and (3) distributed generation. No rationale to support eliminating these alternatives to the proposed installation of new transmission lines was documented in the Southline Draft EIS. We request that this omitted analysis be included in a supplemental Draft EIS.	Alternatives considered but eliminated from detailed analysis were discussed in section 2.9 of the Draft EIS. Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to describe these proposed alternatives and the rationale for dismissal, much like section 2.3.3 in the SunZia Final EIS.
626	82	82.45	SunZia	Wray	9-NEPA	Summarily, the alternatives analysis does not present a reasonable range of alternatives, nor does it provide justification or disclosure of the reasons for excluding from consideration the other reasonable alternatives outlined herein. As written, these deficiencies cannot be cured between a draft and final EIS. Consequently, the Draft EIS should be reissued as a supplemental Draft EIS, with these deficiencies addressed, followed by an additional public review opportunity and comment period. The failure to do so will likely lead to a fatally-flawed NEPA process.	Alternatives considered but eliminated from detailed analysis were discussed in section 2.9 of the Draft EIS. Chapter 2 of the EIS has been revised to consider additional minor route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis. The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
627	82	82.46	SunZia	Wray	9-NEPA	Evaluation and disclosure of environmental impacts are inadequate. The evaluation of impacts that could result from the construction and operation of the Southline Project are inadequate and do not meet the criteria established by the NEPA. The NEPA requires that agencies take a "hard look" at the impacts of the proposed action. A "hard look" is defined as a reasoned analysis containing quantitative or detailed qualitative information. The analyses must be at a level of detail sufficient to support reasoned conclusions by comparing the amount and degree of change (impact) caused by the proposed action and alternatives (40 CFR and BLM NEPA Handbook 2008).	Impacts described in chapter 4 of the Draft EIS are quantified, to the extent possible or where data were available. The impact analysis in Chapter 4 of the EIS has been revised to include more information, where appropriate, on the scale of potential impacts.
628	82	82.47	SunZia	Wray	9-NEPA	The Draft EIS discusses the levels or magnitudes of impacts in Section 4.1.3 Significance and Impact Indicators and "…uses the terms major, moderate, or minor/negligible in describing the intensity of effects." Additionally, the Draft EIS uses both short- and long-term durations to assist in quantifying the context of the proposed Southline Project in relation to the resources analyzed. However, in nearly every resource analysis section, the Draft EIS does not identify what magnitude, duration, or combination thereof, constitutes a Significant Impact5. Are the descriptions of major or high impacts and significant impacts similar? What sets apart major impacts from significant impacts? Footnote: 5 This fundamental problem with determination of significance is pervasive throughout all resource sections except for the Section 4.2 Air Quality where significant impacts are clearly defined.	Section 4.1.3 of the EIS has been revised to provide additional clarity deemed significant and how that is different from those potential impacts considered major.
629	82	82.48	SunZia	Wray	9-NEPA	Additionally, little-to-no information is presented in the form of relative intensity of impacts between alternatives, restricting the comparison of alternatives to only a comparison of acreages affected. We request that the Southline Draft EIS produce clarity on these issues.	Chapter 4 of the EIS provides additional clarity on impacts deemed significant and how that is different from those potential impacts considered major. However, please note that tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS (now tables 2-15, 2-16, 2-17, and 2-18 in the EIS) included the relative intensity of impacts for all resource topics.
630	82	82.49	SunZia	Wray	9-NEPA	In general, the conclusions of the Draft EIS are not adequately supported by the information presented. Insufficient information is available in the inventory of the affected environment to reasonably connect them to the potential impacts of the Southline Project. It is nearly impossible for someone reviewing the Draft EIS to understand the rationale behind the conclusory statements regarding impacts of the Southline Project on the environment.	Chapter 4 of the EIS has been revised to provide additional clarity on impacts deemed significant and how that is different from those potential impacts considered major. The impact analysis in chapter 4 of the EIS has been revised to include more information, where appropriate, on the scale of potential impacts.
631	82	82.50	SunZia	Wray	9-NEPA	There are no impact maps or data of appropriate scale to illustrate the resources that are impacted, or results showing the intensity or context of site-specific impacts. On the maps that are shown (e.g., Figures 3.8-1, and 4.9-2), the scale and resolution are insufficient to disclose the study corridor boundaries, resource data, specific locations and quantities of physical disturbance, and impacts specific to resources. The generally accepted practice in analysis of environmental resource data for representing resource mapping is to use a scale of 1:24,000. The Southline Draft EIS does not disclose the scale used, but it appears the approximate scale ranges from 1:500,000 to 1:1,000,000.	Maps in the EIS include more detailed locational information, as appropriate.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
632	82	82.51	SunZia	Wray	9-NEPA	The land use resource report prepared by CH2M Hill appears to utilize approximate scales ranging from 1:450,000 to 1:750,000. This does not constitute a “hard look” at potential environmental consequences, as required and described above. We request the mapping scale be modified to a scale that will allow the public an opportunity to fully review and understand the potential environmental impacts of the Southline Project.	The Southline Transmission Line Resource Reports cited in the draft EIS are some of many valuable reference documents used in the analysis. Data used in the draft EIS were available to the public, upon request to the BLM or Western Project points of contact listed on the BLM website (http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html). Though data and conclusions in the Southline Transmission Line Resource Reports contributed to the analysis, they were not determinative of the conclusions made in the EIS. While this supporting information is part of the Administrative Record and publicly available, the NEPA public comment process is focused on the Draft EIS itself.
633	82	82.52	SunZia	Wray	9-NEPA	The following are examples that demonstrate that the Draft EIS conclusions are not adequately supported by the data provided for public review in the document: In Section 3.8 Biology (Affected Environment), there is minimal information on species ranges, or geographic locations of vegetation types, while Section 4.8 Biology (Environmental Consequences) provides no species-specific and very little general information on the potential response of individuals and populations to construction and operation of the Southline Project; and	Chapters 2 and 4 of the EIS provide additional clarity on how potential impact conclusions were derived and the assumptions for the analysis, as appropriate.
636	82	82.55	SunZia	Wray	9-NEPA	We request that the Draft EIS be supplemented to include a meaningful analysis of impacts, including disclosure of what impacts are indeed significant.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
637	82	82.56	SunZia	Wray	9-NEPA	The levels of ground disturbance are underestimated. The description of the methodology used to estimate potential temporary and permanent ground disturbance resulting from construction and operation of the Southline Project are insufficient to adequately assess its accuracy. For example, Section 2.4.2– 2.4.3 and Table 2-8 of the Draft EIS discuss access road construction and associated disturbance. However, details regarding assumptions that greatly influence ground disturbance resulting from access road construction (i.e., slope) are not described.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS).
638	82	82.57	SunZia	Wray	9-NEPA	Additionally, in order to limit the amount of new road construction for the Southline Project, Access Level D should use existing roads within 600 feet of the Southline Project alternative centerlines, instead of the estimated 700 feet as stated in Section 2.4.2. If the typical span of the New Build section is 1,200 feet, then it would require an equal amount of ground disturbance to build two spur roads at 600 feet. Beyond 600 feet from a Southline Project alternative centerline, construction of a new road from structure-to-structure would typically result in less ground disturbance than building spur roads from existing roads to each structure work area. We request the methodology used to estimate ground disturbance be modified to better estimate the potential temporary and permanent ground disturbance impacts during the construction and operation phases of the Southline Project.	Minimizing impacts from the establishment of new access roads is an important consideration. However, impacts go beyond the single consideration of area of disturbance. The stated 700 feet offset from existing roads is used to be inclusive of other factors in establishment of roads.
686	82	82.105	SunZia	Wray	9-NEPA	The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
691	82	82.110	SunZia	Wray	9-NEPA	Initial Impacts, Mitigation Planning, standard and selective mitigation, and residual impacts are used sporadically through all the resources and have no context. This section should be revised using terminology that is consistent with the other sections of the Draft EIS.	Chapters 2 and 4 of the EIS provide additional clarity on how potential impact conclusions were derived and the assumptions for the analysis, as well as the difference between committed vs. proposed mitigation, and potential residual impacts.
692	82	82.111	SunZia	Wray	9-NEPA	The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
695	82	82.114	SunZia	Wray	9-NEPA	The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
703	82	82.122	SunZia	Wray	9-NEPA	In general, the conclusions of the Draft EIS are not adequately supported by the information presented. Insufficient information is available in the inventory to connect affected habitat to the possible impacts on species.	Chapters 2 and 4 of the EIS provide additional clarity on how potential impact conclusions were derived and the assumptions for the analysis. Additional information on consultation with the FWS has been included in the EIS in section 4.8 and in chapter 5.
705	82	82.124	SunZia	Wray	9-NEPA	Little or no discussion is provided on potential off-site impacts of the Southline Project. We request that this deficiency be corrected. The Draft EIS should be supplemented to address the unclear nature of these impacts by actually disclosing impacts and the rationale for the conclusions. Then, the Draft EIS should be republished and an additional 30-day comment period be provided to allow public review and comment on the same.	Potential direct and indirect impacts, including offsite impacts, of the proposed Project, were analyzed in the Draft EIS. The commenter does not provide additional information for consideration of offsite impacts beyond those described in the Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
714	82	82.133	SunZia	Wray	9-NEPA	The Draft EIS is silent with respect to whether the Southline Project's owner has begun soliciting potential generation customers that will express their interests or requests for interconnection to the Southline Project. Ostensibly, Southline will, at some point, begin soliciting customers, and have knowledge of the potential interconnections. This is particularly likely given the fact the Southline's eastern terminus begins at substations located adjacent to the Afton natural gas combined-cycle power plant in New Mexico, its midpoint interconnects with the Apache Generating Station in Arizona and terminus at the Saguaro power plant in Arizona. At this time, it is unclear what the make-up of transmission customers for the Southline Project may look like, but sometime between now and before the issuance of the Record of Decision, Southline, and/or Western, will likely become aware of the identity, location, and source of at least some of the transmission customers of the Southline Project. While a transmission project such as Southline does not necessarily have to engage in a "crystal ball inquiry" into identifying the impacts of future interconnections, such projects are required to disclose the types of impacts that are likely to occur as a result of their own proposed project. There is a NEPA regulation that provides guidance on what to do if certain information is unavailable or incomplete, such as the information needed to analyze the effects of the type of generation future customers of the Southline Project may seek to transfer over the Southline Project transmission lines. It is reasonable to assume that Southline will eventually have transmission customers, which could include generation projects with environmental impacts, resulting in cumulative impacts on the total environment. If Southline does not currently have information available regarding these generation interconnectors, then it should comply with 40 C.F.R. § 1502.22 by providing such information in the Draft EIS	Southline has not yet determined how it would solicit transmission customers. When Southline makes that determination, it will make an appropriate filing with the Federal Energy Regulatory Commission. As discussed in section 1.10.3 in the Draft EIS, no proposed generation sources have been identified that would intend to connect to the proposed Project.
715	82	82.134	SunZia	Wray	9-NEPA	One method to do so, which is frequently used by the BLM for oil and gas leasing where the exact location of wells is unknown at the ROW application phase for the pipeline, is through the use of Reasonably Foreseeable Development Scenarios. A "Reasonably Foreseeable Development Scenario" ("RFD") provides the mechanism to analyze basic information in the NEPA document under various alternatives. However, as written, the Southline Project EIS fails to disclose any potential impacts from future generation interconnections, thereby leading to a groundless assumption that there is no potential for cumulative impacts exists that may be associated with future interconnections. Recall, cumulative impacts require the analysis of impacts "on the environment which results from the incremental impact of the action when added to other… reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 CFR § 1508.7	Section 4.21 of the Draft EIS described the cumulative effects of the proposed Project that would result when combined with other past, present, and reasonably foreseeable actions. Speculative future energy projects are not considered in the analysis, either individually or via an RFD. As discussed in section 4.21.2 of the Draft EIS, "reasonably foreseeable" actions are considered where there is an existing decision (i.e., ROD or issued permit), a commitment of resources or funding, or a formal proposal (i.e., a permit request). Actions that are highly probable based on known opportunities or trends (i.e., residential development in urban areas) are also considered. Speculative future developments (i.e., enabling access to unknown renewable energy projects) are not considered.
716	82	82.135	SunZia	Wray	9-NEPA	As written, if the Southline Project identifies an interconnection prior to the issuance of the Record of Decision, and the interconnection is not currently disclosed or identified in the Draft EIS, it would have to prepare a Supplemental EIS as there would be analyzable cumulative impacts not previously considered. If this Draft EIS utilized an RFD, this future duty to supplement such cumulative impacts would have been previously disclosed and analyzed. The Draft EIS should be supplemented to include a form of compliance with 40 C.F.R. § 1502.22, whether through the use of RFDs or another means. This failure cannot be cured in the Final EIS, and warrants re-publication of a supplemental Draft EIS.	Section 4.21 of the Draft EIS described the cumulative effects of the proposed Project that would result when combined with other past, present, and reasonably foreseeable actions. Speculative future energy projects are not considered in the analysis, either individually or via an RFD. As discussed in section 4.21.2 of the Draft EIS, "reasonably foreseeable" actions are considered where there is an existing decision (i.e., ROD or issued permit), a commitment of resources or funding, or a formal proposal (i.e., a permit request). Actions that are highly probable based on known opportunities or trends (i.e., residential development in urban areas) are also considered. Speculative future developments (i.e., enabling access to unknown renewable energy projects) are not considered. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Comments on the Draft EIS have been addressed in the EIS.
717	82	82.136	SunZia	Wray	9-NEPA	The Analysis of the Upgrade Section Alternatives fails to consistently disclose and analyze the impacts associated with the expansion of the 12 substations connected with the Upgrade Section of the Southline Project.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses. These potential impacts were accounted for in the Draft EIS.
718	82	82.137	SunZia	Wray	9-NEPA	For each substation upgrade, there will be additional temporary and permanent ground disturbances. See Id. Consequently, there will be additional impacts to the environment. The Draft EIS fails to analyze the impacts of the substation expansions for the following resources: • Geology and Mineral Resources • Soil Resources • Biological Resources • Cultural Resources • Socioeconomics and Environmental Justice • Public Health and Safety	Section 2.4.2 of the EIS includes additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
719	82	82.138	SunZia	Wray	9-NEPA	Failure to analyze direct, indirect, and cumulative impacts from a proposed action, which includes the substation expansion associated with the Upgrade Section of the Southline Project, is a NEPA flaw. Consequently, the Draft EIS must be supplemented to include an analysis of the impacts associated with the expansion of the substations on the resources, and re-published for additional public comment.	Section 2.4.2 of the EIS includes additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses. These potential impacts were accounted for in the Draft EIS.
720	82	82.139	SunZia	Wray	9-NEPA	The Impacts Analysis is insufficient because it fails to disclose and analyze the impacts of the Southline Project with sufficient specificity as to the location of the impacts. An agency that fails to take a “hard look” at the impacts of a project, and violates NEPA, if that agency fails to examine, consider, and disclose site-specific factual information regarding the baseline and direct, indirect, and cumulative impacts of the each resource potentially affected by the project. New Mexico ex rel. Richardson v. Bureau of Land Mgmt., 565 F.3d 683, 704 (10th Cir. 2009) citing Citizens' Comm. to Save Our Canyons v. Krueger, 513 F.3d 1169, 1178 (10th Cir. 2008).	Chapter 4 of the EIS provides additional clarity on potential site-specific impacts, as appropriate. Maps in the EIS include more detailed locational information. The commenter has not provided any examples of areas where impact analysis is deficient, or suggested any means to improve the analysis specifically.
721	82	82.140	SunZia	Wray	9-NEPA	The EIS must, in and of itself, meet the requisite level of specificity in terms of geographic scope and unique environmental factors within that geographic scope, depending on the particular project and its stage of development. An agency’s failure to conduct an analysis that takes location or site-specific environmental factors into account when considering and disclosing potential environmental impacts of the proposed action results in a fatal NEPA flaw. Here, the impacts analysis for each resource merely identifies the impacts that could occur along the entire segment of each Route Group. The length of each alternative in each Route Group is between approximately 48 and 145 miles long. Consequently, the Draft EIS does not identify where along a 48 to 145 mile segment a particular impact occurs. This renders the impacts analysis almost meaningless, as local stakeholders cannot appreciate if a particular resource is impacted in a particular way in an area which they are concerned about. For example, the Draft EIS represents that the impacts would be less severe with respect to the Upgrade Section, as compared to the new build section of the project, because the right-of-way has been “previously disturbed.” See e.g. Draft EIS at pp. 780, 783, 784, 787, 788, 789, and 795. This representation ignores the fact that the Upgrade Section would require a new 150 ROW and likely impact resources that are not currently disturbed by Western’s existing line.	Chapter 4 of the EIS provides additional clarity on potential site-specific impacts, as appropriate. Maps in the EIS include more detailed locational information. The commenter has not provided any examples of areas where impact analysis is deficient, or suggested any means to improve the analysis specifically.
722	82	82.141	SunZia	Wray	9-NEPA	Likewise, this representation ignores the fact that the Upgrade Section requires the expansion of 12 substations onto lands previously undisturbed by the existing substations, thereby impacting resources that are currently undisturbed.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses.
723	82	82.142	SunZia	Wray	9-NEPA	Without the ability to understand the physical location of the impacts described in the Draft EIS, it is impossible to know whether it includes an analysis of previously undisturbed resources. Consequently, the Draft EIS should be supplemented to include a disclosure of where impacts occur along each Route Group’s segment, thereby disclosing to the public, and the decision- maker, the location, nature, and severity of potential impacts.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
724	82	82.143	SunZia	Wray	9-NEPA	The supplement could include additional text disclosing the location of the impacts, or it could include the use of maps which depict the location of impacts along each segment within a Route Group, thereby allowing one reviewing the EIS to understand where each type of impact is likely to occur. This is particularly important, where, as here, the Draft EIS has failed to analyze the impacts associated with the proposed expansion of 12 substations for six categories of resources.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
725	82	82.144	SunZia	Wray	9-NEPA	Southline Transmission Project Routing Report (CH2M Hill 2012). As noted in the comments for the Draft EIS, examination of the routing report fails to adequately consider a reasonable range of alternatives, specifically in the Upgrade Section for the proposed Southline Project (see Section I. C.).	The Southline Transmission Line Routing Report cited in the Draft EIS were one of many reference documents used in the analysis. Conclusions in the EIS are independent of data and conclusions in the Southline Transmission Line Routing Reports.
726	82	82.145	SunZia	Wray	9-NEPA	The Purpose and Need from the Agencies as noted in this comment letter, likewise does not preclude the evaluation of other reasonable alternatives. The only rationale given for restricting the evaluation of alternatives to upgraded sections through the Tucson urban area is stated in Section 1.1.5 Project Siting-Development of the Upgrade Section,	Alternatives in the Draft EIS were developed to meet regional electrical and system needs and Southline’s goals and objectives. They were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Chapter 2 of the EIS has been revised to consider additional route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis). The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work.
727	82	82.146	SunZia	Wray	9-NEPA	As discussed in detail in the discussion on “Alternatives” in this letter, the alternatives to the Upgrade Section do not constitute an evaluation of a reasonable range of alternatives in comparative form, which is considered the “heart of the environmental impact statement” as noted in the CEQ Regulations Section 1502.14. The Southline Draft EIS unnecessarily limits the alternatives identified to those that only met the narrow “technical needs of the project.”	Alternatives in the Draft EIS were developed to meet regional electrical and system needs and Southline’s goals and objectives. They were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Chapter 2 of the EIS has been revised to consider additional route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis. The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
734	82	82.153	SunZia	Wray	9-NEPA	It is noted in the Draft EIS (Section 2.4.3 Project Construction Activities) that removal and replacement of Western's existing 115 kV facilities and associated line outages would be necessary in dense urban areas, but these locations, or quantifiable impacts associated with these system outages are not discussed or disclosed.	Section 2.4.3 and section 4.1.1 of the EIS have been revised to clarify the lack of potential impacts on resources covered in the EIS from system outages.
735	82	82.154	SunZia	Wray	9-NEPA	In addition, it appears certain locations of existing transmission facilities through Tucson are constrained by residential, commercial and governmental facilities (e.g., schools, community centers and parks) that would require land acquisition through condemnation. Specifics regarding these impacts should be evaluated with regard to context and intensity, as they may represent significant impacts that have not been disclosed. Site-specific analysis should have been completed in the Draft EIS. Having failed to do so, the BLM and Western are now required to supplement the Draft EIS and re-publish it for public review and comment. The lack of sufficient site-specific analysis of impacts cannot be cured between the Draft and Final EIS.	Section 1.1.1 of the EIS has been revised to clarify the additional requested ROW; however, please note that some areas would not need additional ROW (i.e., between the existing Del Bac and Rattlesnake substations). The ROW easement acquisition process was described in section 1.9 of the Draft EIS. Potential impacts to the physical, human, and natural environment were analyzed in chapter 4 of the Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
741	82	82.160	SunZia	Wray	9-NEPA	For the reasons provided in these comments, the Draft EIS does not adequately disclose or analyze the potentially significant environmental impacts of the proposed action.	The EIS addresses comments received on the Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
742	82	82.161	SunZia	Wray	9-NEPA	These comments also illustrate that there are new, reasonably-available alternatives that are outside the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce potentially significant environmental impacts.	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Chapter 2 of the EIS considers additional route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis. The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work.
743	82	82.162	SunZia	Wray	9-NEPA	The identification of additional information, apparent lack of data, and inadequate establishment of meaningful criteria for analyses are of such a magnitude that they should have full public review at a draft stage. Respectfully, these conclusions indicate that the Draft EIS does not meet the purposes of NEPA, and thus should be formally revised and made available for public review and comment in a supplemental or revised Draft EIS.	The EIS addresses comments received on the public Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
744	82	82.163	SunZia	Wray	9-NEPA	This Draft EIS is deficient in several key areas of investigation. These shortcomings are sufficiently significant to mislead the public attempting to understand, comment on, and react to Southline's proposed project on federal lands,	The Final EIS addresses comments received on the public Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
745	82	82.164	SunZia	Wray	9-NEPA	BLM and Western Purpose and Need statements are too vague, and impermissibly narrow the scope of alternatives analyzed with respect to the Upgrade Section.	The agency purpose and need statements, as described in sections 1.21 and 1.2.2 of the Draft EIS, accurately describe the agency's objectives. The purpose and need statement is intended to be a statement of the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed Project, per 40 CFR 1502.3. The purpose and need of each agency (BLM and Western), as articulated in the Draft EIS, are determined based on the Federal actions requested. Please note that there is a difference between the agencies' purpose and need statements and the objectives of the applicant (see section 1.3 of the Draft EIS). Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Chapter 2 of the EIS has been revised to consider additional minor route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis. The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work.
746	82	82.165	SunZia	Wray	9-NEPA	Agency reliance on data prepared by Southline and its consultants without evidencing that review, independent verification, and approval of such data was conducted.	Information on the independent review process is available in the Project Record. Chapter 5 of the EIS describes the independent evaluation process used prior to referencing them in the Draft EIS. Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
747	82	82.166	SunZia	Wray	9-NEPA	Resource reports that were prepared by Southline's consultant, relied upon in the Draft EIS as the exclusive source of information prepared in connection with the EIS for establishing the baseline of resources, were not made available for stakeholder review and comment for the entire comment period.	The commenter is incorrect. The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request.
748	82	82.167	SunZia	Wray	9-NEPA	The analysis of reasonable and feasible alternatives to the proposed action was deficient.	Statement of opinion.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
749	82	82.168	SunZia	Wray	9-NEPA	Evaluation and disclosure of environmental impacts are inadequate because they lack sufficient physical location specificity and fail to, for several resources, include an analysis of impacts associated with the substation expansions connected with the Upgrade Section of the proposed action.	Chapter 4 of the EIS provides additional clarity on potential site-specific impacts, as appropriate. Maps in the EIS include more detailed locational information.
750	82	82.169	SunZia	Wray	9-NEPA	The resource reports provided by Southline's consultant are flawed because they failed to apply the appropriate methods for identifying baselines for each resource, and were not verified through site-specific field observations	The Southline Transmission Line Resource Reports cited in the Draft EIS were one of many valuable reference documents used in the analysis. Data used in the Draft EIS were available for the full 90-day comment period, upon proper request. A field review of data is not required to disclose the potential impacts of the proposed Project.
751	82	82.170	SunZia	Wray	9-NEPA	The resource reports were prepared through a "desktop" level literature review, and lack sufficient safeguards to ensure they accurately reflect the affected environment. If the affected environment is, as it is here, inaccurately characterized, the impacts analysis is inaccurate.	Potential impacts in the Draft EIS have been evaluated based on best available current data, in collaboration with cooperating agencies listed in chapter 5 of the Draft EIS. Information on the independent review process is available in the Project Record. Chapter 5 of the EIS describes the independent evaluation process used prior to referencing them in the Draft EIS. A field review of data is not required to disclose the potential impacts of the proposed Project. The commenter provides no additional data or specific instances where data were incorrect or where better data were available for use in the EIS.
752	82	82.171	SunZia	Wray	9-NEPA	Correcting the deficiencies in the Southline Draft EIS identified in this letter is the duty of the BLM and Western, who are the decision-makers conducting this EIS. In addition to the requested actions detailed in this letter, specific actions include the following as part of a supplemental Draft EIS, as these deficiencies cannot be "cured" between the Draft and Final EIS: • Expand BLM's Purpose and Need that will be addressed by the Southline Project, other than BLM's general obligations under FLMPA.	See chapter 1 of the Draft EIS. The purpose and need of each agency (BLM and Western) are articulated in section 1.2, and are determined based on the Federal actions requested. Please note that there is a difference between the agencies' purpose and need statements and the objectives of the applicant (see section 1.3 of the Draft EIS). The EIS addresses comments received on the public Draft EIS. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
753	82	82.172	SunZia	Wray	9-NEPA	Explain Western's Purpose and Need that will be addressed by the Southline Project and clarify the discrepancies between Western's described needs to upgrade the Apache-Tucson-Saguaro 115 kV line in Western's "FY14 Ten-Year Appropriated Capital Program" (dated October 23, 2013) and the proposed action submitted by Southline.	Section 2.5 (the no action alternative) has been revised in the EIS to describe the difference in timing between the proposed Project and Western's plans in the FY14 Ten-Year Appropriated Capital Program.
754	82	82.173	SunZia	Wray	9-NEPA	Describe the BLM's and Western's method of reviewing and verifying the accuracy of any data or reports provided by Southline.	Information on the independent review process is available in the Project Record. Chapter 5 of the EIS has been revised to describe the independent evaluation process used prior to referencing the reports in the Draft EIS.
755	82	82.174	SunZia	Wray	9-NEPA	Identify and disclose Southline's consultants and their role in the preparation of the Draft EIS.	Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
756	82	82.175	SunZia	Wray	9-NEPA	This action should include a listing of the preparers of the 20 resource reports, including their name, organization and qualifications for preparing this data upon which the Draft EIS heavily relies,	Although the authors of the Southline Resource Reports are not the preparers of the EIS, the authors of those reports are included in chapter 5 of the EIS.
757	82	82.176	SunZia	Wray	9-NEPA	An identification of the BLM and Western personnel that independently verified the accuracy of the reports.	Information on the independent review process is available in the Project Record. Chapter 5 of the EIS has been revised to describe the independent evaluation process used prior to referencing the reports in the Draft EIS. Agency staff listed in section 5.7 of the Draft EIS was involved in verifying the accuracy of the data and analysis in the Draft EIS, as stated in section 5.7.
758	82	82.177	SunZia	Wray	9-NEPA	Make the resource reports available on the BLM website for public review. BLM's efforts to provide the resource reports on an as-requested basis does not satisfy the BLM's duty to make this information reasonably available for the public, as the resource reports were not "readily" available or accessible for the entire public comment period on the Draft EIS.	The Southline Transmission Line Resource Reports cited in the Draft EIS are one of many valuable reference documents used in the analysis and were made available during the comment period on the Draft EIS by contacting the Project Manager, Mark Mackiewicz. Conclusions in the EIS are independent of data and conclusions in the Southline Transmission Line Resource Reports.
759	82	82.178	SunZia	Wray	9-NEPA	Expand the alternatives studied for the Upgrade Section to include a reasonable range of alternatives, including those identified herein.	Alternatives in the Draft EIS were derived based on the issues presented during scoping, as well as on internal agency (BLM and Western) and cooperating agency feedback. Chapter 2 of the EIS considers additional minor route variations (see sections 2.6 and 2.7 of the EIS), as well as additional alternatives considered but eliminated from detailed analysis. The commenter has not raised any reasonable, viable alternatives that accomplish the substation interconnections that make this proposed Project work.
760	82	82.179	SunZia	Wray	9-NEPA	Additionally, the alternatives' analysis must include a description of all alternatives considered but eliminated from detailed consideration, including a rationale behind the elimination for each alternative.	Alternatives considered but eliminated from detailed analysis were discussed in section 2.9 of the Draft EIS.
761	82	82.180	SunZia	Wray	9-NEPA	Address the specific resource concerns detailed in this letter.	Chapter 4 of the EIS provides additional clarity on potential site-specific impacts, as appropriate. Maps in the EIS include more detailed locational information.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
762	82	82.181	SunZia	Wray	9-NEPA	Perform field verification of the all data that was used in each resource report prepared by Southline.	Potential impacts in the Draft EIS have been evaluated based on best available current data, in collaboration with cooperating agencies listed in chapter 5 of the Draft EIS. Information on the independent review process is available in the Project Record. Chapter 5 of the EIS has been revised to describe the independent evaluation process used prior to referencing the reports in the Draft EIS. A field review of data is not required to disclose the potential impacts of the proposed Project. The commenter provides no additional data or specific instances where data were incorrect or where better data were available for use in the EIS.
763	82	82.182	SunZia	Wray	9-NEPA	Revise the analysis to cover the additional area required for the expansion of the 12 existing Western substations.	Section 2.4.3 of the EIS has been revised to include additional information on the estimates for disturbance presented in table 2-7 (previously table 2-8 in the Draft EIS), including how potential substation expansion impacts are considered in the analyses. These potential impacts were accounted for in the Draft EIS.
764	82	82.183	SunZia	Wray	9-NEPA	Evaluate impacts from acquiring an additional 125-foot ROW for the Upgrade Section.	As described in chapter 2 of the Draft EIS, in locations where possible, the new 230-kV line would be built 50 feet away from the edge of the existing 100-foot ROW, parallel to the existing line, for a total of 150 feet. Only 50 feet of new ROW would be needed, where possible. See also figure 2-15b in the Draft EIS.
765	82	82.184	SunZia	Wray	9-NEPA	Develop an RFD for future generation related to potential interconnection requests.	Section 4.21 of the Draft EIS describes the cumulative effects of the proposed Project that would result when combined with other past, present, and reasonably foreseeable actions. Speculative future energy projects are not considered in the analysis, either individually or via an RFD. Section 4.21 of the EIS has been revised to clarify which future actions are considered speculative and why.
766	82	82.185	SunZia	Wray	9-NEPA	Reevaluate the environmental impacts and disclose this new information in a supplemental Draft EIS for public review and comment	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
767	82	82.186	SunZia	Wray	9-NEPA	In order to avoid a fatally-flawed NEPA document , this Draft EIS requires supplementation and republishing for an opportunity for infonned review and comment by the public.	Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.
781	84	84.1		Kestler	9-NEPA	I'm very pleased you will go around Tumacoc and have less environmental impact than existing lines.	Thank you for your comment. The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally.
782	84	84.2		Kestler	9-NEPA	Also glad access lines are only 150 feet wide – far superior to Sunzia with I pray will not be approved. Please find the least invasive way to impact Benson and the many miles of conservation easements worth of it.	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally.
784	85	85.1	Fort Sill Apache Tribe	Thompson	9-NEPA	As you may or may not be aware, the proposed route and several substation locations for the Southline are located close to the Fort Sill Apache Tribe's Akela Flats Reservation in Luna County, New Mexico and the Tribe's fee and trust lands in Cochise County, Arizona .	The Fort Sill Apache Tribe's Akela Flats Reservation was discussed in sections 3.11 and 4.11 of the Draft EIS.
785	85	85.2	Fort Sill Apache Tribe	Thompson	9-NEPA	First I want to say that the Tribe did receive appropriate notices during the NEPA and planning process and did participate and attend meetings regarding this proposed project. Unfortunately, at that time of the NEPA reviews and planning meetings, the actual development of the project and selected route of the Southline were in question. As a result, our review was based more on a potential, rather than an actual project. Thus, some of the questions we had regarding the project were not raised by the Tribe.	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally. The proposed Project and alternatives were described in chapter 2 of the Draft EIS.
786	85	85.3	Fort Sill Apache Tribe	Thompson	9-NEPA	In addition, because the Tribe was never formally invited to participate as a cooperating agency and had other matters, including its own NEPA compliance issues on its proposed projects in New Mexico and Arizona, the Tribe has not provided comprehensive comments to the BLM on this proposed project. However, the Tribe has been told by several well connected sources that the project's viability is more certain and that this information, along with the issuance of the "Final EIS" leads us to the conclusion that the project will be moving forward .	As discussed in section 5.4 of the Draft EIS, the Fort Sill Apache were invited to be a cooperating agency. Chapter 5 of the EIS has been revised to indicate that additional outreach with the tribe was completed prior to the publication of the EIS.
787	85	85.4	Fort Sill Apache Tribe	Thompson	9-NEPA	As a result, the Tribe would like to obtain more detailed and concrete information on the actual route footprint of the Southline and the site footprints of the Proposed Midpoint Substation in New Mexico and the Apache Substation in Arizona. From the maps we have reviewed, both of these sites are located close to the Tribe's trust and/or fee lands in New Mexico and Arizona.	BLM sent a letter to the tribe on August 7, 2014 asking for more information on the trust and fee lands in Arizona, and coordination is ongoing.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
788	85	85.5	Fort Sill Apache Tribe	Thompson	9-NEPA	In that regard, we would like to setup a meeting to review the Southline route footprint and the location of the two substations. Please let us know when a meeting can be arranged with the Tribe.	BLM sent a letter to the tribe on August 7, 2014 asking for more information on the trust and fee lands in Arizona, and coordination is ongoing.
789	86	86.1	New Mexico Department of Game and Fish	Wunder	9-NEPA	Our comments pertain only to portions of the new build section located in New Mexico.	Noted.
793	86	86.5	New Mexico Department of Game and Fish	Wunder	9-NEPA	The Department strongly supports the northern Agency Preferred Alternative (Subroute 1.1 and 2.1), and does not support implementation of the southern Proponent Alternative (Subroute 1.2 and 2.2). Within Route Group 2, the Department strongly recommends the selection of Local Alternative LD-3a, which entirely avoids the Lordsburg Playa. When it holds water, Lordsburg Playa is an important wintering area for sandhill cranes and siting of a large transmission line near the playa would cause additional crane mortality.	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in Section 2.6 of the EIS are considered equally. The proposed Project and alternatives were described in chapter 2 of the Draft EIS. The biological importance of the Lordsburg Playa is discussed in sections 3.8 and 4.8 in the EIS. The segment referred to in the comment (a portion of LD3a) was included as part of the Agency Preferred Alternative in the Draft EIS (see section 2.10.5). Local alternative LD3a is part of the revised Agency Preferred Alternative in the EIS (see section 2.10.5).
796	86	86.8	New Mexico Department of Game and Fish	Wunder	9-NEPA	The Department also supports selecting Local Alternative DN-1 if SunZia transmission line is approved, because it would allow co-location.	The Final EIS includes the Agency Preferred Alternative. While the preferred alternative is presented, the final route will be determined in the ROD. Until that decision document is signed, any alternative segment could be selected in the ROD. Until that time, all action alternatives described in section 2.6 of the EIS are considered equally.
574	80	80.12		Magruder	9-NEPA	a. Rights-of-Way. The SunZia proposal does not use existing ROW corridors for most of its options, thus it follows the “Last Law of Transmission Line Siting”, that is, to use new ROWs and create new environmental impacts. The ROW corridors for Southline varies between 150 and 200 feet while that for SunZia are proposed to be up to 1,700 feet and includes two power line systems instead of one for Southline.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline’s request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western’s evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western’s Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter’s concerns were best directed at that process for appropriate consideration.
579	80	80.17		Magruder	9-NEPA	The SunZia Alternative including its environmental impacts must be included and compared with the Southline project in the either a Supplemental or the Final EIS.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline’s request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western’s evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western’s Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter’s concerns were best directed at that process for appropriate consideration. Though portions of the EIS have been revised in response to public and agency comments on the Draft EIS, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared.

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Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
572	80	80.10		Magruder	8-MISC	4. New Alternative: The Southline Project can significantly reduce GHG from the Apache Power Plant. Comment 10. This critical issue was not discussed in the Draft EIS; however, by having the siting approved for the Bowie Generation Plant changed to be close to the existing Apache. The Apache Power Plant is one of the ten most polluting power plant in the country This coal-fueled power plant has been a major target of the EPA with significant cost impacts necessary to meet the EPA mandates for clean air. To meet this mandate, the present plans are to convert one of the two Apache generators to natural gas while continuing to keep the other Apache generator- using coal at great expense for pollution equipment changes its various primary cooperative customers. e remains some opposition to the approved "greenfield" siting at Bowie that was initially proposed to use coal. After receiving significant criticism this plant was approved by the Arizona Corporation Commission as a natural gas fueled plant in Bowie, Arizona. Unfortunately, there is no transmission infrastructure to support the Bowie location. If it was re-sited in the general vicinity of the existing Apache Power Plant and Substation, then there would be no reason to install expensive pollution control equipment on a coal-fueled generator as a relocated "Bowie" plant at the Apache site where existing transmission exists and will be significantly improved by the Southline Project. This will save Southern Arizona rural cooperative customers from having to pay for this pollution control equipment for a very old generator. A new natural gas generator (e.g., "Bowie") can easily meet the EPA mandated GHG requirements for the Apache Power Plant. This Alternative including its environmental impacts must be included in the either a Supplemental or the Final EIS.	The BLM and Western developed alternatives to the proposed route in order to address issues raised by Federal land management, State and local agencies, and the public. This alternative is outside the scope of the Southline EIS.
56	20	20.1	–	Christensen	8-MISC	I oppose ALL new construction of more of these dammed unsightly power lines that mar our landscapes and vistas. I ask that you not allow more of these ugly dammed things – No Mas! We need to make do with what is already here!	Statement of preference.
152	31	31.1	Wild Heart Ranch	Lannon	8-MISC	Southline is to be commended for taking an environmentally responsible approach to its transmission line project, especially the portion from Willcox west where they will replace existing power lines with new ones. This avoids tearing up pristine desert with roads and construction and resulting threats to wildlife, archaeology sites, communities, and the Avra Valley.	Thank you for your comment.
154	31	31.2	Wild Heart Ranch	Lannon	8-MISC	The SunZia transmission line project can take a lesson from Southline. Their misrepresentations, political lobbying, and plans for desert destruction are nothing less than shameful.	A comparison of the potential impacts from the not yet constructed SunZia project is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration.
181	36	36.3	Hearing-State of New Mexico, Military	Scott	8-MISC	I'm the director of the office of Military Base Planning and Support for the State of New Mexico. And there's another transmission project I've been involved in, and they're doing a lot of staff work at the state level. I wanted to compliment the Bureau of Land Management and Southline, particularly Mr. Bill Kipp and Doug Patterson, for their leadership and their effort in working with everyone as they put their plan together. I have not read the Draft EIS, but I know it will be a great product. I want to compliment Bill Childress from the BLM district here in working with the installations in the southern part of the state to support their mission. I think this process is an outstanding manifestation of that.	Thank you for your comment.
182	37	37.1	Hearing	Darr	8-MISC	I would like to state that the Southline project is a tool for nothing but money. The Southline people want what we have in Hidalgo County. They can't get it where they're from; so they're going to ruin what we have here. We have beauty, pristine, clean, open spaces, untouched frontier, and the true meaning of purple mountain majesty. I tell that Southline group go make your money in your own state. Hidalgo County has had plenty of foreigners come in here to do their great plans and their illustrious ideas, and then they leave, and they leave us with the ruination of their consequences. They don't care about this state or this county like the people who live and survive here. And many of us don't want them here or their power line here, including myself. They're going to destroy our eco-culture of the Southwest by adding their disgusting power line to our landscape. It's a perfect target for terrorists because if SunZia comes through, that's just that many more that someone could throw a bomb on, and then you're out of luck. We're just a tool for them to make money. I will not sell them one grain of sand of my land which is right in the middle of the Hidalgo County area of their project. They will have to do everything they can to keep me out. I will not allow them to trespass in any way or form, and I will get whatever law enforcement is needed to keep them off.	Potential impacts to visual resources, land use, special designations, and social and economic conditions were considered in chapter 4 of the Draft EIS.
183	37	37.2	Hearing	Darr	8-MISC	I would like to enforce and request from the BLM that they reconsider this project in general. Do they want there to be a last frontier left which is Hidalgo County in New Mexico, or do they want the ruination of us to be just like everything else with power lines going everywhere for the world to see instead of the beauty that we have right now? And that's all I have to say.	The no action alternative was an alternative considered in detail in the Draft EIS. As stated in section 2.5 in the Draft EIS, under the no action alternative, the BLM would not grant the ROW for construction and operation of the proposed Project. Western would not provide Hoover Act funding, and Western would not participate in the proposed Project.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
202	38	38.19	Hearing	Lindberg	8-MISC	I own property that has the easement on my side of the line for the existing power line. And I agree with the last gentleman that spoke that to double the electrical transmission right through J-6 and/or actually through Mescal area and through Benson seems silly when there are a lot less people living north of the area. And I do believe there was a proposed alternate route that went north of the airport and I'd like everybody to support that and fight for it because it will be far less of an eyesore way off in the distance and far less environmentally hazardous to us .	As discussed in chapter 2 (see section 2.7) of the Draft EIS, alternative H would go north of the town of Benson, north of the airport. The potential visual impacts of alternative H, as well as other alternatives considered in detail in the Draft EIS can be found in section 4.10.
284	59	59.1	International Brotherhood of Electrical Workers	McBride	8-MISC	BLM's stewardship and protection of our environment is commendable. Those who erect powerlines for a living are aware of their effect on the environment when they build lines. In their training they are taught to minimize their "footprint" while working.	Thank you for your comment.
285	59	59.2	International Brotherhood of Electrical Workers	McBride	8-MISC	One point that may be lost here is that once built, a powerline has little traffic around it and mother nature reclaims her land within a year. The land will not become "virgin" again but minimizing the damage brought by progress is not only a noble aim but it is achievable. Infrastructure work in the US is necessary, help our industry make everyone aware that environmental awareness is necessary also.	Thank you for your comment.
371	68	68.48	Pima County	Bernal/Connolly	8-MISC	Section 3.9.2 formatting errors obscure lines 8-16. Is this an electronic artifact?	No errors noted upon review.
479	75	75.1		Sheehan	8-MISC	I am writing to express my opposition of the proposed routing of the Southline Transmission Project, which will run through and/or near several very important bird habitats: The San Pedro River Valley, Tumamoc Hill, Cienega Creek, and the Willcox Playa. Please advocate for the avoidance of these very impotant areas for birds as part of the power lines placement.	The potential impacts to Important Bird Areas were analyzed in section 4.8 of the Draft EIS. As noted in chapter 2 (see section 2.7 of the Draft EIS), BLM and Western developed alternatives designed to avoid or minimize impacts to sensitive resources such as Tumamoc Hill and Willcox Playa.
546	78	78.19	Coalition For Sonoran Desert Protection	Campbell	8-MISC	Lack of Support for Any Action Alternative Given the overarching lack of adequate mitigation measures proposed for impacts to Pima County's Conservation Lands System and Arizona's wildlife linkages, along with a shallow analysis of impacts to Arizona's wildlife linkages, we cannot support any alternative at this time.	Statement of preference. Additional information on impacts to Pima County CLS has been included in sections 3.11 and 4.11 of the EIS. AGFD is a cooperating agency on the proposed Project, and in addition to consulting with AGFD (see section 5.4 of the Draft EIS), impacts to wildlife linkages were considered in section 4.8.2 of the Draft EIS.
551	79	79.4	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	8-MISC	The draft EIS/Draft RMPA was also hard to follow because of the exhaustive amount of information that was presented. The BLM should re-examine whether some information is needless detail or whether it is critical information.	The EIS has been revised based on all substantive public comments on the Draft EIS. Narrative in the executive summary has been shortened, as appropriate.
552	79	79.5	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	8-MISC	The draft EIS/draft RMPA could use also some additional editing to eliminate some of the redundancy. In particular, the Executive Summary is too long and some of the information presented on the Purpose and Need is could be shortened since it is discussed in more detail in Chapter 1.	The EIS has been revised based on all substantive public comments on the Draft EIS. Narrative in the executive summary has been shortened, as appropriate.
553	79	79.6	New Mexico Department of Cultural Affairs Historic Preservation Division	Ensey	8-MISC	At this point in time, the NMSHPO does not support one alterative over the other as it was very difficult to evaluate the alternatives as they relate to the identification and assessment of effects to historic properties. It is my understanding that the Agency Preferred Alternative is a combination of the proponent preferred and proponent alternative segments Pl, P2, P3, P4a, P& and local alternatives LD3a, LD4, and LD4-option 5	As discussed in section 2.10.5 of the Draft EIS, the Agency Preferred Alternative for the New Build Section would include Proponent Preferred segments P1, P2, P3, P4a, and P7 in combination with local alternatives LD3a, LD4, and LD4-Option 5 for a total of 244 miles. The Agency Preferred Alternative for the Upgrade Section would include Proponent Preferred segments U1a, U1b, U2, U3a, U3b, U3c, U3d, U3f, U3g, U3h, U3i, U3k, U3l, U3m, and U4, in combination with local alternatives TH1a and TH1-Option around Tumamoc Hill, and MA1 near the Marana Regional Airport. Tables 2-15, 2-16, 2-17, and 2-18 (previously tables 2-11, 2-12, 2-13, and 2-14 in the Draft EIS) have been revised in the EIS to include additional detail on anticipated impacts to cultural resources. Please note that as discussed in the EIS, the Agency Preferred Alternative for route groups 1 and 2 avoids any impact to the El Paso and Southwestern "Southline" Railroad, which runs along several segments of potential southern routes.
563	80	80.1		Magruder	8-MISC	I strongly recommended approval of the Southline Project. I propose changes at the Apache Generation Station.	Statement of preference.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
564	80	80.2		Magruder	8-MISC	I do NOT recommend its competitor, the SunZia Project be constructed, as Southline has vastly superior capabilities. These two significant issues should be in either a Supplemental EIS or the Final EIS.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. The not yet constructed SunZia project is considered as a reasonably foreseeable action, and the potential impacts of both SunZia Southwest Transmission Line and the Southline Project are considered in section 4.21.
565	80	80.3		Magruder	8-MISC	Since 2000, Santa Cruz County, Arizona, has been had its power constrained due to limitations on the existing Western Area Power Administration (WAPA) transmission line that serve my county. The Southline system removes this issue, provides greatly improved reliability and will be very beneficial for all in Southern Arizona, including customers for every electric utility including all the rural electric cooperatives, Tucson Electric Power Company (TEP), and the Arizona Public Service Company (APS). Our grid will be much stronger and robust. A similar transmission line proposal by SunZia does not provide any of these benefits. Further, this project also provides a cost- effective solution to meet the Environmental Protection Agency (EPA) green house gas (GHG) mandates for the Apache Power Plant, near Willcox, Arizona.	This is a statement of preference. This alternative is outside the scope of the Southline EIS.
566	80	80.4		Magruder	8-MISC	Unfortunately, this version of the Draft EIS for the Southline Transmission Project did not include such an alternative to reduce the GHG impacts from the Apache Power Plant or compare this project with a competing proposed transmission project, the SunZia Transmission Project, also being evaluated by the same BLM Office. Both of these omissions are serious and must be corrected in either a Supplemental EIS or in the Final EIS for the Southline Project.	The BLM and Western developed alternatives to the proposed route in order to address issues raised by Federal land management, State and local agencies, and the public. This alternative is outside the scope of the Southline EIS.
568	80	80.6		Magruder	8-MISC	Increased Power Availability. This project resolves the power requirements that have existed for several decades for those living in Southern Arizona and New Mexico/El Paso because of the reuse and upgrading of the existing substations. These eleven substations are all vital customer interconnections with the Southline Project.	The comment accurately reflects the objectives of Southline Transmission, LLC, as described in section 1.3 of the Draft EIS.
569	80	80.7		Magruder	8-MISC	Increased Reliability. One important feature of this project is the new short interconnection with the TEP Vail Substation, one of the three major substations for the Tucson metropolitan area. This interconnection will permit TEP to use power from the Southline whenever TEP's other transmission lines are having difficulties. Due to the increased forest fires that frequently impact TEP's power sources, this system will provide a much-needed "second" line for this region. In addition, this is a double-circuit system that also increases reliability by having redundant circuits in case one of the circuits has a fault.	The comment accurately characterizes one of the objectives of Southline Transmission, LLC (Improve Reliability of the Electric Transmission Grid in Southern New Mexico and Arizona), as described in section 1.3 of the Draft EIS.
570	80	80.8		Magruder	8-MISC	Resolving the EPA Mandate for the Apache Generation Station. If the ACC-approved and permitted Bowie natural gas power plant was located near the existing coal-fueled Apache Power Plant and upgraded Apache Substation near Willcox, then this issue can easily be resolved, since one of the two generators in planned to be converted to natural gas then the "Bowie" plant could easily replace the other half of the Apache plant and greatly reduce the existing GHG issues that involve this plant. This issue did not appear to be discussed in the Draft EIS.	This alternative is outside the scope of the Southline EIS.
571	80	80.9		Magruder	8-MISC	Removal of a Possible El Paso Constraint. There has been reported by the Federal Energy Regulatory Commission (FERC) that there are a possible constraints on the transmission lines that connect El Paso to the Western Interconnection (some doubt if this really exists) to the west. If so, then Southline has the necessary additional capacity and reserve to eliminate any such constraint.	The BLM and Western developed alternatives to the proposed route in order to address issues raised by Federal, State and local agencies, and the public. This alternative is outside the scope of the Southline EIS.
587	82	82.6	SunZia	Wray	8-MISC	Cite specific page numbers or relevant identifying information to each piece of material referenced and relied upon in the Draft EIS.	The literature cited style in the Draft EIS is based on Government Printing Office (GPO) publication standards and meets requirements of the Code of Federal Regulations. Specific page numbers are included when referencing report pages specifically.
590	82	82.9	SunZia	Wray	8-MISC	The Draft EIS does not contain citations with sufficient specificity to the resource reports. See e.g. 43 C.F.R. § 46.135 (b) ("Citations of specific information or analysis from other source documents should include the pertinent page numbers or other relevant identifying information.") Instead, all BLM and Western stated with respect to these resource reports, which form the basis for the baseline upon which the analysis is conducted in the Draft EIS, is that "[t]he contents of that report are used herein without specific reference." This is a specific statement acknowledging the failure and refusal to comply with the requirements of 43 C.F.R. § 46.135. While a NEPA document may rely upon materials incorporated by reference, it can only do so by complying with the regulations governing incorporating materials by reference.	The literature cited style in the Draft EIS is based on Government Printing Office (GPO) publication standards and meets requirements of the Code of Federal Regulations. Specific page numbers are included when referencing any CH2M Hill resource reports specifically. Otherwise, the CH2M Hill resource reports are treated as any other source material in the Draft EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
575	80	80.13		Magruder	8-MISC	b. Increased Power Availability. The SunZia proposal bypasses all existing substations (except Apache), including by passing all the substations near and serving Tucson, a known power sink up to 750 MW in the summer. TEP needs additional power resources to meet these load requirements. SunZia does not serve any southern Arizona or New Mexico/El Paso customers.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. The not yet constructed SunZia project is considered as a reasonably foreseeable action, and the potential impacts of both SunZia Southwest Transmission Line and the Southline Project are considered in section 4.21.
576	80	80.14		Magruder	8-MISC	c. Increased Reliability. The SunZia proposal does not improve reliability for any customers in Southern Arizona or New Mexico/El Paso.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. As discussed in section 1.2 of the Draft EIS, BLM must respond to Southline's request for ROW, per FLMPA (per 43 U.S.C. 176(a)(5)). Western's evaluation of whether the Southline Project is in the public interest is part of the process whereby Western determines whether the Project is eligible to receive funding from Western's Borrowing Authority under Section 402 of the American Recovery and Reinvestment Act of 2009 (PL 111-5). Western has not made a decision on whether to provide funding to the Southline Project. The not yet constructed SunZia project is considered as a reasonably foreseeable action, and the potential impacts of both SunZia Southwest Transmission Line and the Southline Project are considered in section 4.21.
30	13	13.1	San Carlos Apache Tribe		8-MISC	Concurrence with Report findings & thank you. Additional Information – We agree with project as long as the work stays within ROW & Doesn't destroy non-disturbed areas & cultural material.	Thank you for your comment. Comment noted.
577	80	80.15		Magruder	8-MISC	d. Resolving the EPA Mandate for the Apache Power Plant. The SunZia proposal does not assist in resolving this issue at the Apache Substation.	The BLM and Western developed alternatives to the proposed route in order to address issues raised by Federal land management, State and local agencies, and the public. This alternative is outside the scope of the Southline EIS. The SunZia project was subject to its own detailed EIS, and the commenter's concerns were best directed at that process for appropriate consideration.
578	80	80.16		Magruder	8-MISC	e. Removal of a Possible El Paso Constraint. The SunZia does not assist in resolving this issue.	Noted.
797	87	87.1	Department of Defense (DOD) Siting Clearinghouse	Aimone	9-NEPA	The Department of Defense (DoD), in coordination with its Military Departments does not object to the agency preferred alternative route specified in the Southline Transmission Project draft Environmental Impact Statement. However, to preserve DoD's mission capabilities into the foreseeable future at the Buffalo Soldier Electronic Test Range (BSETR) at Fort Huachuca, Arizona, we request that any Right-of-Way (R/W) agreement between the applicant and the Bureau of Land Management incorporate the attached stipulations.	Thank you for your comment. Comment noted.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
798	87	87.2	Department of Defense (DOD) Siting Clearinghouse	Aimone	9-NEPA	However, to preserve DoD's mission capabilities into the foreseeable future at the Buffalo Soldier Electronic Test Range (BSETR) at Fort Huachuca, Arizona, we request that any Right-of-Way (R/W) agreement between the applicant and the Bureau of Land Management incorporate the attached stipulations. The Department of Defense request that any Right-of-Way agreement between the applicant and the Bureau of Land Management on the Southline Transmission Project incorporate the following stipulations: • Prohibit connections of any type to the transmission line on any portion of its route crossing BSETR and out to a distance of one mile from the range boundary. Such connections include substations , transformers and converter stations; • Opportunity to "micro-site the transmission line and associated towers to shield BSETR test sites from Electromagnetic Effects (EME); • Utilize electromagnetic interference reducing construction techniques and/or special construction to minimize EME; • Cooperate with BSETR to measure and establish an EME "floor value," including the cumulative effects of any existing transmission lines in the utility corridor ; • Develop and implement an enhanced transmission line maintenance program to correct material conditions when EME is detected above the mutually agreeable "floor value," and • Provide curtailment of transmission line operations during a specified period of time each year or as required by the BSETR of Fort Huachuca to implement short suspense critical testing, with total outage time and coordination measures to be developed in a balanced manner to meet both DoD and developer requirements.	Thank you for your comment. These stipulations were included in table 2-7 in the Draft EIS (now table 2-8 in the EIS) as design features for Military Operations. The stipulations are considered PCEMs that would be complied with in full (they are not selective); see section 2.4.6 of the EIS.
799	88	88.1	Liberty Land and Cattle; Y Cross Management Group	Way	7-LAND USE	I own a tract of land at the southern tip pf the Wilcox Playa in southern Arizona and have received an undated letter with maps regarding a route variation for the “Southline Transmission Line EIS”. I would like to know how this variation may impact my property and/or rights. Please advise.	BLM responded with a map showing Project location in relation to Mr. Way’s property In February 2015. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize impacts to wildlife at the Willcox Playa. Route variation P7a is not a part of the Agency Preferred Alternative, as described in section 2.10.5 of the EIS. Segment P7a would intersect Mr. Way’s property south of Willcox Playa. A discussion of potential impacts on property values and rights is included in the EIS in section 4.15.
800	89	89.1		Ottens	9-NEPA	At least four alternate routes are shown on the map you enclosed. Assuming the route labeled P7a is under consideration, the following objections apply: The route does not, as stated, avoid impacts upon migratory Sandhill Cranes, since they routinely feed in fields and other areas traversed by the proposed line. This behavior is similarly important to the nesting area since it provides sustenance for the cranes during the nesting season.	BLM responded in February 2015. Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize (not avoid), impacts to wildlife at the Willcox Playa. All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS. Per Draft EIS comment letters from the FWS (letter # 71) and AGFD (letter #67), route variations P7a through P7d would be farther away from known roost sites and would likely be at a location within the crane’s flight paths where the birds are of sufficient altitude that a strike would be very unlikely. The AGFD has provided additional mitigation measures to offset impacts to wildlife habitat along segment P7 in the Willcox Playa area, which have been added to the EIS as PCEMs in table 2.8.
801	89	89.2		Ottens	9-NEPA	The modified route, in any of the variations, does not follow an active pipeline as stated. Indeed, it does cross the only active gas line in at least two places, coming close to an existing compressor plant at the eastern end of Arzberger road. If a pipeline is assumed to follow or lie beneath Narita Lane, I am advised that this gas pipeline is abandoned from a tap serving Willcox (lying north of State Route 186) southward to the vicinity of the compressor plant and that the right-of-way has reverted to the adjacent property owners. I note also that Narita Lane is the only access to the western properties within Chiricahua Trails Ranches subdivision to the east of the Land. Should the lane be blocked, we will not have access to our home.	The letter you received indicated that the route variation P7a follows an existing gas line, not necessarily an active gas line. As noted in table 2-8, prior to the start of construction, Southline and its construction contractor would prepare a Traffic and Transportation Management Plan for the Project to address the timing and routing of Project trips in an effort to minimize Project impacts on local streets, highways, and railroad operations.
802	89	89.3		Ottens	9-NEPA	Your letter indicates that the route skirts the eastern edge of the agricultural area. This is in error; the lines pass through the areas now used and planned for expansion of viticulture, the growing of wine grapes. The area of the Willcox Step is prime agricultural land for this use, presently accounts for approximately 70 percent of the high-quality wines produced in Arizona, and will continue to expand for the foreseeable future. Please note that the growing number of tasting rooms and two annual wine festivals have become major income generating events Willcox.	Error noted. Sections 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations) in this EIS include a discussion of potential impacts to farm and rangelands, including vineyards.
803	89	89.4		Ottens	9-NEPA	Choosing a route that circumnavigates the Playa seems an inelegant solution to your problem. Either following the existing power line across the Playa or following I-10 to AZ191 to the Apache Power Plant would seem the most reasonable route. The cranes are already used to the lines across the Playa.	The EIS considers alternatives paralleling the existing transmission line across the playa (see P7), as well as along I-10 (see local alternative WC1). Statement of preference noted.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
804	90	90.1	Tucson Airport Authority	Coyle	9-NEPA	Thank you for the opportunity to comment on the proposed route variation for the Southline Transmission Line EIS. At this time, the TAA supports the proposed relocation of the transmission route. It should be noted that FAA Form 7460-1 will need to be filed before physical construction can occur within the Tucson International Airport Obstacle Free Zone.	Statement of preference noted. Information regarding FAA Form 7460-1 has been added to section 3.18 of the EIS.
805	91	91.1	Rhumb Line Vineyard	Myers	9-NEPA	I just became aware of the proposed power line project that's less than 1,400 ft from my property. We are located south of Willcox off of Robbs Road. I found a presentation on the BLM website which stated that comments will be received until July 10, 2014. Is this the most up to date information on the project? I was hoping to make comments.	BLM responded with a map showing Project location in relation to Mr. Myer's property In February 2015. Segment P7a would be located just east of, and along S. Wayward Wind Road (east of Rhumb Line Vineyard). Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. Sections 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations) in this EIS include a discussion of potential impacts to farm and rangelands, including vineyards.
806	92	92.1		Arnaud	7-LAND USE	I am owning the parcel APN 205-12-186 between the Apache Power Station and Sandal Street (see attachment), Does your project is going to touch my land? I plan to plant trees there! so I would like you avoid you put anything on that parcel. Could you please confirm and eventually to send a more detailed map from that specific area?	BLM responded with a map showing Project location in relation to Mr. Arnaud's property In February 2015. Mr. Arnaud's property is located south of segment U1a and west of route variation P7a. The proposed Project would not touch his land. The potential impacts of all project alternatives (including the route variations) are considered in chapter 4 of the EIS.
807	93	93.1	Questa Mine, Chevron Mining, Inc.	Schoenbacher	9-NEPA	Can I get the shapefiles that affect or come near Parcel 205 11 061. I received the letter and would like to know what is the next step and where my voice comes into play as a property owner.	No shapefiles were provided; however, a detailed map was offered to the landowner. Mr. Schoenbacher's land is located west of the existing Apache Substation; the proposed Project would not intersect his property. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
808	94	94.1	Copper State Plastering	DesRochers	9-NEPA	I just received the letter from Bill Childress regarding a Proposed route variation and the BLM EIS for the Southline Transmission Line. It appears that this new route will go through my property located at 9035-9049 South Eisenhower Road. If this indeed goes through my property what will this mean to me?	BLM responded with a map showing Project location in relation to Mr. DesRochers's property In February 2015. Segment U3a (the existing Western line) is located south of Mr. DesRochers's property. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
809	95	95.1	Chase Farms, LLC	Jantz	9-NEPA	This letter is in response to notification – 1793 (L000). I wish to urge you to reconsider the proposed new "route variation" marked as "P7a".	Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. Statement of preference noted.
810	95	95.2	Chase Farms, LLC	Jantz	16-PHS	As a manager of a large pecan orchard adjoining the new proposed route of a major electrical transmission line, I am concerned for the safety of my workers, as the route appears to be located on, or very near, a major portion of the farm (P7a, P7c, & P7d). We have employees performing manual pruning of trees & other work that we are unable to do with equipment. A second but equally valid concern is the helipad & hanger which has recently been constructed & finished at the north east corner of the farm. The current landing approach is from the east. A large transmission line would compromise the safety of landing a helicopter at this location. Thirdly, there has also been a new residence constructed at the same north east corner of farm. I am concerned about health issues of living so near a major electric transmission line.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential public health and safety impacts are considered in sections 3.16 and 4.16.
811	97	97.1		Robbs	7-LAND	I own a rental property at a location in the Kansas Settlement near the proposed route variation of the Southline Transmission Line. My property is at the intersection of Arzberger Road and Wayward Winds Road and it appears from the map that it is located directly on the path of the proposed line. I live near Seattle, WA but may like to retire at this house in a few years. It is currently being rented to Doug Meyer so you may have sent him information about this proposed route . I just learned about this from my neighbors at Zapara Vineyards. This is very concerning because I would like to have a wine tasting room on my property there when I retire.	BLM responded with a map showing Project location in relation to Mr. Robb's property In February 2015. Mr. Robb's property is located just west of segment P7b. Route variation P7b is not included in the Agency Preferred Alternative in the EIS. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
812	97	97.2		Robbs	16-PHS	In addition there are negative health effects being near a high voltage transmission line.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential public health and safety impacts are considered in sections 3.16 and 4.16.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
813	98	98.1		Young	9-NEPA	Call from Mr. Young indicating that links to the web site did not work. Where the line is coming in relation to his property	BLM verified that the project website was working, and responded with a map showing project location in relation to Mr. Young's property In February 2015. Segment U3a (the existing Western line) and route variation U3aPC are located north of Mr. Young's property.
814	99	99.1		Walker	9-NEPA	Call from Mr. Walker regarding the letter he received on the proposed Southline local routing options. Where is the line in relation to his property.	BLM responded requesting an address in order to provide a project map. No response.
815	100	100.1		Gabriele/ Neely	9-NEPA	I received the letter regarding the Southline Transmission Line. Several years ago I had a similar situation with a Pipeline. I am curious, what is the protocol for the land owners? I live in New York but do visit the property on a yearly basis to check on it. I am aware (or it was the last time I visited it) that there is not much of an investment or future as a retirement property for me. This property was passed down to me from my parents who purchased it while stationed overseas with the Army during the 1970's. I hold onto it thinking someday during my lifetime it will have some value. If the Transmission Line does go through it what will that do to the future of the land? Does it help or hurt it?	BLM responded with a map showing Project location in relation to Ms. Neely's property In February 2015. Ms. Neely's property would be located just south of route variation P7a. Please note that P7a is not included in the Agency Preferred Alternative in the EIS. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
816	101	101.1		Carbonneau	9-NEPA	This is the first we have heard of this potential invasion of our property. We have never been asked, involved or contacted regarding use of our property lots. we find your letter stamped 12/16/14 to be offensive, rude and assuming. The only fact in your letter is-IT IS OUR LAND.	BLM responded in February 2015 requesting an address in order to provide a project map. No address provided. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
817	101	101.2		Carbonneau	8-MISC	We do not grant permission for your project either on, through, near under or above our building lots	Comment noted. As described in section 2.9.1 of the EIS, landowners would be contacted to obtain right-of-entry, as needed.
818	101	101.3		Carbonneau	13-SOCI	Your project defaces, devalues and destroys our property as well as disrupting our property views. You have no right of way from us. We purchased these 3 joined building lots for our family's future, not yours.	The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1, in terms of visual impacts in section 4.10, and in terms of property value in section 4.15 of the EIS.
819	102	102.1	Zarpara Vineyard	Jorve	9-NEPA	Since the modified route does not appear to be one of those originally presented to the public or considered during public hearings, will there be another round of public comments and/or hearings so that impacted people and businesses can benefit from an in-person presentation and comments can be gathered on the modified route? What is the process at this point?	BLM responded In February 2015. Mr. Jorve's property is located west of route variation P7b; please note that P7b is not included in the Agency Preferred Alternative in the EIS. There will not be any additional public meetings hosted by the BLM and/or Western. Public comments are accepted anytime in the EIS process. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record. The potential impact of the proposed transmission line on property in terms of land use is described in section 4.11.1 and in terms of property value in section 4.15 of the EIS.
820	102	102.2	Zarpara Vineyard	Jorve	7-LAND	The letter states that the modified route "skirts the edge of the agricultural area", which is true in terms of farm crops such as corn or cotton, but you may not be aware that the modified route cuts through an area that has been developing in recent years with wine grape vineyards and tasting rooms. This area is locally known as the Willcox Bench. This area begins roughly at the 2 mile marker east from Kansas Settlement Road on either Robbs Road or Arzberger Road, where the elevation reaches about 4200 feet, and follows the alluvial slope up towards the foothills of the Dos Cabezas Mountains. There are currently 11 vineyards in the area, 3 of which operate tasting rooms. Our vineyard, Zarpara Vineyard, was planted in 2010, and was the seventh vineyard on the Bench at the time. More vineyards are planned, and hopefully, more tasting rooms as well. We are concerned that the transmission line will detract from the natural aesthetics that we think are important to our wine tasting room business. This may sound superficial, but we think the aesthetics of this area play an important role in our business. We are also concerned that the transmission line might chill further development of vineyards and tasting rooms in this area. The development of the wine industry in this area is important to us personally because we think we need more vineyards and tasting rooms on the Willcox Bench to draw in more tourists, and it is also important to the Willcox region because it brings in needed tourist dollars and provides employment.	Error noted. Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
821	104	104.1		Sakellarakis	8-MISC	Thank you for the noce about the proposed power line routs. I've shared the info with my nieghbours, and we unanimously conclude that it would be best for everyone that lives here if the "NEW route variation" is used, the one that goes north of the residences on the north side of Old Vail Connection Rd. That variation/route is simply more logical, just simply from our perspective as residents here. Hopefully the NEW route might help, perhaps from a maintenence perspective, its easier to access away from residential areas, I dont know but I hope there is enough incentive for you to just take the simple and better route north of Old Vail Connection.	Thank you for your comment. Statement of preference noted.
822	105	105.1	Deep Sky Vineyard	Asmundson	9-NEPA	I received a copy of letter 1793(L0000) from my neighbor Mark Jorve. We own 20 acres of vineyards between Robbs Road and Arzberger Road to the East of Kansas Settlement Road. We were not notified of the modified route of the transmission line.	BLM responded in February 2015. Letters were mailed to potentially affected property owners with parcels located within 0.5 mile of the proposed Project route variations.
823	105	105.2	Deep Sky Vineyard	Asmundson	19-VIS	This new route would be extremely detrimental to the local vineyards. There are 11 vineyards in the area and 3 of them have tasting rooms. We also plan to build a tasting room in the next few years. These businesses bring tourists and jobs to the Willcox area. They support the restaurants, hotels, shops and gas stations in the southeastern section of Arizona. The transmission line would detract from the natural beauty of the area and would limit future vineyard development. Your letter states that it skirts the edge of the agricultural area. It may not matter to a cotton farmer, but it would be visible from our vineyard and would severely impact our decision to build a tasting room. It may not matter to a cotton farmer, but it would be visible from our vineyard and would severely impact our decision to build a tasting room.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
824	105	105.3	Deep Sky Vineyard	Asmundson	9-NEPA	Will there be further hearings on this matter due to the route variation?	There will not be any additional public meetings hosted by the BLM and/or Western. Public comments are accepted anytime in the EIS process. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record.
825	106	106.1	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	As I understand it, the presently favored route takes these new lines right through the heart of Arizona's wine country. While grape vines may not care where the power lines are routed, tourists sure do, and they are the primary source of revenue in this business.	BLM responded with a map showing Project location in relation to Mr. Gonnerman's property in February 2015. Mr. Gonnerman's property is located east of route variation P7a. This segment is not included as a part of the Agency Preferred Alternative in the EIS. Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
826	106	106.2	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	Naturally those of us with vineyards in the area would like the power lines to follow the originally proposed route which went very near the playa.	Thank you for your comment; statement of preference noted.
827	106	106.3	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	Now that new routes are being proposed, will there be a comment period?	There will not be any additional public meetings hosted by the BLM and/or Western. Public comments are accepted anytime in the EIS Process. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record.
828	107	107.1	Chiricahua Ranch Vineyards	Carbonneau	8-MISC	For the record: my e-mail was sent on 12/23/14-not on 1/13/15. It took almost a month and a half for a response.	Discrepancy noted here and in the Project Record.
829	107	107.2	Chiricahua Ranch Vineyards	Carbonneau	8-MISC	I suggest you check your maps to insure you do not trespass on my property.	As described in section 2.9.1 of the EIS, landowners would be contacted to obtain right-of-entry, as needed.
830	107	107.3	Chiricahua Ranch Vineyards	Carbonneau	19-VIS	I have no intention of you destroying my families future housing lots, interfering with property views, and the cause of loss of use and value of the three connecting lots. How would you like to look out your window and see lines/structures on the property that you own and pay taxes on--- let alone the environmental impact on people that it will have	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
831	108	108.1	Rhumb Line Vineyard	Myers	9-NEPA	Thanks for taking my call today regarding the Southline Transmission Project. If you could send me any current maps and timelines on the project, that would be great.	BLM responded with a map showing Project location in relation to Mr. Myer's property In February 2015. Segment P7a would be located just east of, and along S. Wayward Wind Road (east of Rhumb Line Vineyard). Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
832	108	108.2	Rhumb Line Vineyard	Myers	19-VIS	My wife and I own 40 acres off of Robbs Rd and Wayward Winds. We bought the land almost three years ago. We've planted 10 acres of grapevines and had plans to open a winery and tasting room. We are definitely rethinking this decision if, in fact, we'll have high voltage lines running next to our property. This could be a big set back for the AZ Wine and tourism industry. A majority of the wine grapes grown in AZ come from this small area of the state and many wineries have seen increases in traffic to their vineyards over the last 5 years. Most of this increased traffic has come from the attention that these unique wines have be given nationally; Food & Wine Magazine San Francisco Chronicle, Today Show (CBS tomorrow morning), etc. I'm sure that everyone has a concern about how unsightly the power lines can be. I believe this could have a drastic impact on our developing wine and tourism industry, especially in a part of the state that hasn't seen much positive economic possibilities in quite some time.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
833	109	109.1	Zarpara Vineyard	Jorve	9-NEPA	Either Wayward Winds or Narita Lane is bad news for the wine industry on the Willcox Bench, so I will be opposing this route, and will be encouraging other stakeholders to bring pressure to bear to hopefully prevent this transmission line coming through the Willcox Bench or anywhere else that places it between the Willcox Bench and the mountain views. This matter is of very dire concern to my own business and the other businesses close by, but I think the implications go much further, and I will try to explain that in this email.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
834	109	109.2	Zarpara Vineyard	Jorve	13-SOCI	Executive summary: Aesthetics play a large role in the vineyard and tasting room business, and a power transmission line such as Southline would be an obvious detriment to those aesthetics, but I am concerned that the transmission line will deliver an economic calamity that will stall the growth of the wine industry in Cochise County, and not only on the Willcox Bench. I think Cochise County knows that the growing wine industry is a key component of the economic development of the county, and that the Willcox Bench is an essential part of that economic development. The power line will cut through the Willcox Bench, and to my mind, threaten the further growth of the wine industry in this particular area, and because of the unique position of the Willcox Bench in Cochise County, this could stall the wine industry in Cochise County as a whole. The Willcox Bench is a sure thing. It's the goose that lays the golden egg! The power line will force a roll of the dice to see if the wine industry will want to stay on the Willcox Bench or abandon it, as I think is very likely, and try to find a different location to continue growing.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
835	109	109.3	Zarpara Vineyard	Jorve	13-SOCI	But I am not aware of any other location in all of Cochise County that will do the same job as the Willcox Bench (further details on this below). **This is why this is so critical** The wine industry can't just pick up and move down the road. The Willcox Bench is "where it is happening", and for clear reasons, and there is no place else in Cochise County like it. First, let's define the Willcox Bench. It is roughly the strip of land starting on a line 2 miles east of KS Road (where Zarpara Vineyard is), and extending for a few miles to the east along either side of Robbs Road and Arzberger Road. It is bounded by state trust land on the north, and by land that is too low in elevation to grow grapes to the west and south. On the east side, lack of electricity and rougher terrain are the limiting factors. If the Willcox Bench is allowed to grow, we will see vineyards, tasting rooms, B&Bs, resorts, restaurants, etc, take over this area. Zarpara Vineyard was the first tasting room on the Willcox Bench when it opened in 2012. Now there are three. Another vineyard wants to open a tasting room and a bistro. Yet another vineyard wants to open a resort. A B&B has been proposed for Wayward Winds. When Zarpara Vineyard planted its vines in 2010, we were the 7th vineyard on the Bench. Now there are eleven vineyards on the Bench. Two more vineyards, at least one with a tasting room, are in the planning stages. So, I think I have shown that the Willcox Bench is an economic growth area, and has huge potential. The Willcox Bench is unique in Cochise County. There is no other place like it in terms of wine industry growth potential. It has the right elevation for wine grapes, a slope that reduces frost damage in the spring, good soil, close proximity to I-10 and Willcox to draw in tourists, access to electricity, and a good water supply. Let's try to find another place in Cochise County with similar potential: 1. North of Willcox. The two vineyards there (far north, one actually in Graham County) now frequently lose significant crop to frost in the spring, and are too far away anyway to have tasting rooms. The flat farm land between Willcox and those vineyards is too cold for vineyards. 2. San Pedro valley. Texas root rot. That's why you don't see vineyards there now (other than Tombstone). 3. South Sulpher Springs Valley. Controlled by an INA (irrigation non-expansion area), which means no new farming acreage can go under irrigation beyond 2 acres supplied by a domestic well (i.e. no serious vineyards). 4. West side of the Sulpher Springs Valley. Has potential, but is further away from I-10 and lacks close-by amenities like hotels, restaurants, and destinations like the Chiricahua National Monument. 5. East side of the Dos Cabezas Mountains. Too far away for customers, who mostly come from Tucson and Phoenix.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
836	109	109.4	Zarpara Vineyard	Jorve	13-SOCI	From our vantage point here at Zarpara, I'm worried that the transmission line will appear taller than Mount Bowie, so it will block out that view. It will occlude much of Dos Cabezas, so that view will be scarred and unattractive. For any future vineyards/tasting rooms positioned east of the transmission line, the view to the west (which is quite amazing!) will be blocked and dominated by the transmission line. Who would want to open a tasting room close to or under the transmission line? If the transmission line comes through the Willcox Bench: 1. Property values will likely go down. Not such a bad thing if you want to buy some land and plant a vineyard. 2. So let's say a buyer plants a vineyard, but they won't open a tasting room there because of the ugly, eyesore transmission line. It's a more difficult and costly proposition to put a tasting room somewhere other than the vineyard. I think buyers will be discouraged. 3. So, you have three tasting rooms on the Willcox Bench now, and maybe not any more in the future. And you have eleven vineyards on the Willcox Bench now, and maybe not any more in the future. The Willcox Bench needs more vineyards and tasting rooms! More vineyards and tasting rooms means more customers for everyone here. What about the B&Bs and resorts? Would you open a B&B under a transmission line? And if there are only a limited number of tasting rooms on the Willcox Bench, then there is no market for a restaurant. Conclusion: By routing the transmission line through the Willcox Bench, my own business is threatened, and more, the growth of the entire wine industry on the Willcox Bench could stall and come to an end. Due to the uniqueness of the Willcox Bench in Cochise County, this could stall the growth of the wine industry in the county as a whole	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
837	110	110.1		Robbs	8-MISC	Thank you for sending me the map of the proposed corridor of the Southline 345 kilovolt transmission line which runs along Wayward Winds road in the Kansas Settlement near Willcox, AZ. Since I don't know how much the county is aware of this issue I have cc'd the Cochise County Board of Supervisors, the Cochise County Recorder and the Cochise County planning and zoning department.	BLM responded with a map showing Project location in relation to Mr. Robb's property In February 2015. Mr. Robb's property is located just west of segment P7b. Route variation P7b is not included in the Agency Preferred Alternative in the EIS. Cochise County is a cooperating agency, as noted in the executive summary, chapter 1, and chapter 5 of the EIS.
838	110	110.2		Robbs	8-MISC	I am opposed to this high voltage line running along Wayward Winds road and Narita lane for many reasons:	Thank you for your comment; statement of preference noted.
839	110	110.3		Robbs	16-PHS	1. The route along Wayward Winds Road makes a detour between my house at 4915 E .Arzberger road and my uncle's and aunt's home, RL and Sally Robbs at 4995 E. Arzberger Road. This cuts directly through my father's property, Floyd Robbs and RL Robbs' property. Have you made any effort to contact them? I never would have known about your plans unless one of the other property owners had told me about this. Shouldn't you contact the county recorder to determine who lives along this route before you make a decision to take over their property for a high voltage transmission line? 2. This high a voltage is not healthy to people living nearby despite what studies you may cite. There are long term negative effects of living organisms near this high of an electric voltage 3. This line isn't even necessary and it is being constructed only to benefit a billionaire business man, Ray L. Hunt. How would Mr. Hunt feel if a high voltage line was being planned near his house? 4. The Kansas Settlement has recently been discovered to be one of the premiere wine growing areas of the state and the country. The number of vineyards and wineries in that area has been growing each year. Most of the people putting in these wineries are retirees who have worked and saved their entire lives for this dream. Now if that line goes in those visions will be destroyed. It is a known fact that transmission lines will decrease property values tremendously.	Cochise County is a cooperating agency, as noted in the executive summary, chapter 1, and chapter 5 of the EIS. Letters were mailed to potentially affected property owners with parcels located within 0.5 mile of the proposed Project route variations. Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential public health and safety impacts are considered in sections 3.16 and 4.16.
840	110	110.9		Robbs	19-VIS	Additionally the high towers and wires will create a hideous eyesore of disastrous proportions marring the beautiful vistas of the Dos Cabezas mountains.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources). Three visual simulations from area vineyards have also been added to appendix K of the EIS.
841	110	110.10		Robbs	7-LAND	The wine industry of small boutique owners depends heavily on tourism with people visiting local wineries. Most of the wine tourists are from urban areas seeking an escape from their industrialized wired cities.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
842	110	110.11		Robbs	9-NEPA	Please let me know what can be done to stop these lines being built through the Kansas Settlement and better yet to stop this project entirely.	Thank you for your comment; statement of preference noted. Public comments are accepted anytime in the EIS process. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
843	111	111.1	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	May I assume that when comments are added to the project record, they have no impact on the discussion?	Public comments are accepted anytime in the EIS Process. Comments received as a result of outreach regarding the route variations are considered here in the Final EIS and are included in the Project Record.
844	111	111.2	Chiricahua Ranch Vineyards	Gonnerman	8-MISC	I've included my property address and mailing address below. I'd definitely like to be informed	Thank you; you have been added to the project mailing list.
845	111	111.3	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	It's proven difficult to find information about how this project has developed thus far, and how it's ended up along the current proposed corridor.	The Draft EIS was published in April 2014, is available online, and describes the proposed Project and alternatives, as well as the potential impacts. As indicated in the letter to you in December 2014, the route variations new to the EIS are being considered based on comments from the AGFD and public regarding potential impacts to migratory birds at Willcox Playa.
846	111	111.4	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	First, I understand that the first proposed route went north of Willcox. Why was that route removed from consideration?	The EIS considers alternatives paralleling the existing transmission line across the playa (see P7), as well as along I-10 (see local alternative WC1). These alternatives are analyzed in detail in the Draft EIS and are still being considered as routing options.
847	111	111.5	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	Second, I understand that the route between Kansas Settlement Road and the Playa was taken out of consideration due to concerns that AZ Fish & Game had about the Sandhill Cranes. What evidence did Fish & Game present that these power lines would pose a risk to the birds?	As indicated in the letter to you in December 2014, the route variations new to the EIS are being considered based on comments from the AGFD and public regarding potential impacts to migratory birds at Willcox Playa. The Draft EIS includes an analysis of the potential impacts to migratory birds, including sandhill cranes. Additionally, AGFD has developed additional mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
848	111	111.6	Chiricahua Ranch Vineyards	Gonnerman	7-LAND	The current proposed routes are far enough from my property so as not to have a direct impact on my business plans, but they could have a devastating impact on the fledgling wine industry in the area and the business plans of many of my friends and neighbors. It's actually very hard to make a living in this industry, especially as a small producer just starting up. The only way that many survive is by selling wine directly to consumers out of their vineyard tasting rooms, and the best way to do that is to host events.	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
849	111	111.7	Chiricahua Ranch Vineyards	Gonnerman	19-VIS	Tourists just won't be interested in attending events at properties near large power lines. They not only impact the aesthetics	Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
850	111	111.8	Chiricahua Ranch Vineyards	Gonnerman	16-PHS	but many people still believe that proximity to power lines carries health risks. Now I know that studies long ago refuted such claims, but that doesn't change the way people think. Many tourists will simply avoid spending time at vineyards bounded by these huge power lines. Most of Arizona's wine grapes are grown in the Kansas Settlement area because it has the right elevation and soil to be a good place to grow grapes, and water is plentiful. There just isn't any place else for us to go. Any higher and it's too cold, any lower and it's too warm (or conversely too cold, due to temperature inversion). Even if there was another area we could move to, no one could afford to. Average costs for starting a vineyard run $25,000 per acre. No one can afford to simply walk away from that kind of investment and start over somewhere else.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential public health and safety impacts are considered in sections 3.16 and 4.16. Based on this and other similar comments from area landowners the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry.
851	112	112.1		Siegel	9-NEPA	the proposed transmission lines are just steps from my front door and my future vineyard property which is up for sale. As a senior citizen on a fixed income, I beg you to find another route for this lines in Willcox or surrounding grazing areas.	BLM responded with a map showing Project location in relation to MS. Siegel's property In February 2015. Ms. Siegel's property is located just west of route variation P7a. Thank you for your comment. Statement of preference noted.
852	113	113.1	Pillsbury Wines Vineyard & Winery	Pillsbury	3-CUL	This is land that was legendary, from the early Chiricahua Apaches, the Coronado Trail forged by the Conquistadores, Cochise's own continual outwitting of the US Cavalry, and his having the last laugh when he retreated to Cochise Stronghold across the valley in the Dragoons. Never caught, never photographed, still in an unknown burial site. Just over the hill past the ghost town of Dos Cabezas is Fort Bowie and the Chiricahua National Monument. Nestled closer to the Dragoons are the ghost towns of Pearce and Cochise.	Thank you for your comment. The EIS discusses the cultural history of the area (see section 3.9) and specially designated lands such as national monuments (see section 3.14).
853	113	113.2	Pillsbury Wines Vineyard & Winery	Pillsbury	7-LAND	More importantly, this distant and still undiscovered valley was blessed with the most perfect soil, water, and climate for growing wine grapes, one of the most eco- friendly crops possible to grow. Wine grapes use one-seventh of the water and produce up to 10 times the income per acre of other crops.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential impacts to soils, water and climate are considered in sections 4.2, 4.5, and 4.7. The EIS also includes a discussion of viticulture as a land use in this region – see section 3.11.1.
854	113	113.3	Pillsbury Wines Vineyard & Winery	Pillsbury	13-SOCI	And this all translates into jobs in one of the most impoverished regions of the State.	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
855	113	113.4	Pillsbury Wines Vineyard & Winery	Pillsbury	7-LAND	Apart from its history and the economics, this fantastic discovery has the precious attraction, in its isolated and ancient way, of being unspoiled For most of us on the Willcox Bench, the pristine nature of this place, as yet isolated from the ravages of the industrialized world, is the essence of what our wines are showcasing to the rest of the State, and indeed the Country and the World. Pure air. Pure water. Soils as yet unpolluted. Most vineyards, like ours, organic. Vines managed and fruit harvested by hand. Fermented on-site with native wild yeasts. Talk about sustainable! In a world drowning in mass-produced, over-refined food and drink, we have an almost magical power in what we produce, and that's how we market what we do. Our Pillsbury Wine letterhead is our wine label featuring Cochise County, wild and unspoiled. Like the wines.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential impacts to soils, water and climate are considered in sections 4.2, 4.5, and 4.7. The EIS also includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.
856	113	113.5	Pillsbury Wines Vineyard & Winery	Pillsbury	7-LAND	15 years ago there were two tiny vineyards here. Now there are over 500 acres of vines, producing 74% of the grapes used in making authentic Arizona Wine. And we have barely scratched the surface. Look what wine did for Napa Valley. Staggering. And our land is perhaps 4% the cost of Napa land, labor half the price, and 10 times more plentiful. The sky's the limit. Unless of course, the sky is crossed with the massive Southline Transmission Line	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.
857	113	113.6	Pillsbury Wines Vineyard & Winery	Pillsbury	19-VIS	Imagine just the visual impact of these lines in trying to market the virginal quality of this valley. It will drive a knife into the very heart of this fairytale image, exchanging our tiny wooden poles for the massive Transmission Line.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, potential visual impacts are considered in sections 3.10 and 4.10.
858	113	113.7	Pillsbury Wines Vineyard & Winery	Pillsbury	16-PHS	Then consider the physical effect—including the electromagnetic-field-generated impact on the health of all the workers and residents nearby, plus the effect on the quality and likely quantity of our fruit.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically potential public health and safety impacts are considered in sections 3.16 and 4.16. There is no evidence to suggest that fruit in the region would be impacted by a proposed transmission line.
859	113	113.8	Pillsbury Wines Vineyard & Winery	Pillsbury	1-AIR	The line will impact the Equinoxial winds of the Spring, and the Monsoon storm cells in the late Summer.	The potential impacts of all Project alternatives (including the route variations) are considered in the EIS – specifically, air quality and climate impacts are considered in sections 3.2 and 4.2. There is no evidence to suggest that weather patterns would be impacted by a proposed transmission line.
860	113	113.9	Pillsbury Wines Vineyard & Winery	Pillsbury	13-SOCI	The Southline Transmission Line would make a devastating far-reaching difference in the Willcox Bench, the future economy of Willcox and surrounding towns, and the future of the Arizona wine industry. This line will destroy the vines, the dreams, and the livelihood of so many Arizona winegrowers who have literally hewn the Garden of Eden from these desert soils to bring this region and our State to the attention of the International community it deserves. Vines, not lines.	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15. Your opposition is noted here and in the record.
861	114	114.1		Cotignola	9-NEPA	we would love to know if you are still going to build your transmission line since Sunzia is building there	The approved SunZia project and the proposed Southline Transmission Line Project are separate ROW requests and are both being considered by the BLM.
862	114	114.2		Cotignola	9-NEPA	Are you building a brand new elic powerline project or is your project being built to replace an old elic powerline that already there.	For more Project information, see chapter 2 of the EIS. There is a New Build Section that would be new construction of a 345-kV line between the Afton substation in New Mexico and the Apache Substation in Arizona. The proposed Project would also include an upgrade of two of Western's existing 115-kV lines to a 230-kV line between the Apache Substation and the Saguaro Substation in Arizona.
863	114	114.3		Cotignola	9-NEPA	How will your project or the Sunzia project create and bring elic power poles and power lines to the very southern part of Luna County New Mexico about 30 miles south of Deming.	The not yet constructed SunZia project and Southline Transmission Line Project are separate ROW requests. A comparison of the potential impacts from these two projects is beyond the scope of analysis for this EIS, except where addressed as a reasonably foreseeable action in the cumulative effects analysis (see section 4.21). The SunZia project was subject to its own detailed EIS and the project was approved in January 2015. See chapter 2 of the EIS for a description of the Project – segment P2 of subroute 1.1 following an existing transmission line just north of Deming, New Mexico.
864	114	114.4		Cotignola	9-NEPA	Right now are there Elic Power poles & Elic Power lines along the Southern New Mexico border line	See chapter 2 of the EIS for a description of the project – large portions of the proposed Project follow existing transmission lines and other linear infrastructure in Arizona and New Mexico.
865	114	114.5		Cotignola	9-NEPA	Are you building the main Elic power pole lines, next, and will it take local Elic power companies to run & bring new Elc power lines to area right now where there is no Elic power lines right now. (for example) in our opinion South Luna County New Mexico in the future is going to see a large building boom in our opinion. So the question is this, how will the Southern end of Luna County New Mexico get it/must needed new Elic powerlines to the future ok Can you explain it to us	As stated in section 1.3.1 of this Final EIS, the proposed Project would be a transmission-only project. Southline would not purchase power from generators or sell power to others. The proposed Project, as described in chapter 2 of the Draft EIS, would interconnect with up to 14 existing stations where new or existing power generation resources could interconnect to and utilize the capacity Southline would add to the system.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
866	114	114.6		Cotignola	9-NEPA	Do you think that you can please mail us some kind of color map showing us the location more or less showing where your transmission line project will run & be built	BLM responded with a map showing Project location in relation to Mr. Cotignola's property in April 2015.
867	114	114.7		Cotignola	8-MISC	Can you keep us on a mailing list so we can get any new updates or your project being built, ok Also, oh by the way we don't own a computer so we need your time and help with this ok	Added to the mailing list.
868	114	114.8		Cotignola	8-MISC	When do you expect to being construction of your transmission line project do you know	According the Southline's WECC Phase 2 report (WECC 2015), the proposed Project is anticipated to be in service in 2017, with construction occurring prior to that.
869	114	114.9		Cotignola	9-NEPA	do you have plans to bring Elic power pole & line to Upham New Mexico where space port America is located about 90 miles north of Deming New Mexico	See chapter 2 of the EIS for a description of the Project – the Project does not extend that far north.
870	114	114.10		Cotignola	9-NEPA	are you building your project because like myself we expect a boom in New growth and new development in these new areas we would love to know ok	As discussed in sections 1.1.1 and 1.3 of the Draft EIS, the purpose of the Project is to improve reliability in southern New Mexico and southern Arizona, mitigate existing congestion, increase the ability to meet the increasing demand for electricity, and facilitate generation and public policy goals by increasing the capacity of the existing electric transmission grid. As discussed in section 4.15, the proposed alternatives could provide significant long-term benefits by increasing the ability of the grid to meet demand growth in the region.
871	115	115.1	Chiricahua Ranch Vineyards	Gonnerman	13-SOCI	Those of us involved in the wine industry in the Willcox area are very concerned about the new proposed route. No one responded during the official comment period because few were aware of this project and those that were aware were unconcerned. This is because the north route was far from the Willcox Bench and the south route was just far enough away so as not to be problematic. But, as you know, following closure of the official comment period the route moved several miles to the east going straight through the Willcox Bench where it now poses a threat to Arizona's fledgling wine industry. Arizona's wine makers depend on tourism to sell wine. Few distributors or retailers are interested in buying wine from small wineries just starting out. It's for this reason that selling direct to consumers is so vital. This requires getting tourists into the vineyard and winery, and the best way to do that is to host events. Tourists just aren't going to be interested in attending events at vineyards with these power lines nearby. This is both for obvious aesthetic reasons	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15. The potential visual impacts of the Project are discussed in section 3.10 and 4.10.
872	115	115.2	Chiricahua Ranch Vineyards	Gonnerman	13-SOCI	Tourists just aren't going to be interested in attending events at vineyards with these power lines nearby. This is both for obvious aesthetic reasons and due to the persistent belief that electromagnetic emissions are bad for one's health. That the health effects are unsubstantiated is irrelevant; it's what many believe and they will refrain from spending time near these large power lines.	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15. Potential impacts to public health and safety are considered in sections 3.16 and 4.16 of the EIS.
873	115	115.3	Chiricahua Ranch Vineyards	Gonnerman	19-VIS	Also, regarding the first point, aesthetics, would you want power lines in the background of your wedding pictures? Most would not.	The potential visual impacts of the project are discussed in sections 3.10 and 4.10 of the EIS.
874	115	115.4	Chiricahua Ranch Vineyards	Gonnerman	7-LAND	Sure, grapes can be grown right under the power lines, but selling the resulting wine would require having a second location. Few could afford that, and no one can afford to move. Starting a vineyard costs around $25,000 per acre, and no one I know can afford to walk away from that kind of investment and start over elsewhere. Even if they could, where would they go? There's a reason why the majority of Arizona's wine grapes are grown on the Willcox Bench.	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.
875	115	115.5	Chiricahua Ranch Vineyards	Gonnerman	7-LAND	There's a reason why the majority of Arizona's wine grapes are grown on the Willcox Bench. It has adequate water reserves and the right soil and climate, making it the best place in the state.	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15. The potential visual impacts of the Project are discussed in sections 3.10 and 4.10.
876	115	115.6	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	I understand that the south route was modified due to concerns about the impact on the Sandhill Cranes. This is puzzling though, considering how they fly through the area. At my property, two miles east of the new proposed (Narita Ln.) route, the cranes fly overhead at 25 to 50 feet on their migratory route. I know that they fly much higher at some points en route, but for whatever reason they don't achieve those altitudes in the Willcox area	Based on feedback from the public and cooperating agencies on the Draft EIS, new route variations (P7a, P7b, P7c, and P7d) have been included in the EIS to minimize (not avoid), impacts to wildlife at the Willcox Playa. All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS. Per Draft EIS comment letters from the USFWS (letter # 71) and AGFD (letter #67),route variations P7a through P7d would be farther away from known roost sites and would likely be at a location within the crane's flight paths where the birds are of sufficient altitude that a strike would be very unlikely. AGFD has developed additional mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
877	115	115.7	Chiricahua Ranch Vineyards	Gonnerman	9-NEPA	Please consider alternative routes. If the south route must be taken, I believe a route just west of Kansas Settlement Road would have little impact on tourism in the area and be no better or worse for the cranes	Alternatives considered in detail in the EIS are described in section 2.7. No decision on the proposed Project would be made by BLM or Western until at least 30 days after publication of the NOA for the Final EIS. Statement of preference noted.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
878	116	116.1	Merkin Vineyards	Noble	9-NEPA	Call from Mr. Noble regarding the letter he received on the proposed Southline local routing options. Concerned about health impacts and impacts to area vineyards. Caller asked if a decision had been made yet.	All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS. The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15. Potential impacts to public health and safety are considered in sections 3.16 and 4.16 of the EIS. Alternatives considered in detail in the EIS are described in section 2.7. No decision on the proposed Project would be made by BLM or Western until at least 30 days after publication of the NOA for the Final EIS.
879	117	117.1		Verris	9-NEPA	Call from Mr. Verris regarding the letter he received on the proposed Southline local routing options. Concerned about location of new route variations.	All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS.
880	118	118.1		Lynch	9-NEPA	Call from Mr. Lynch asking about the status of the EIS.	Final EIS expected to be published in 2015.
881	119	119.1		Chelenza	9-NEPA	Call from Ms. Chelenza regarding the letter she received on the proposed Southline local routing options. Concerned about location of new route variations.	All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS.
882	120	120.1		Jarvey	9-NEPA	Call from Mr. Jarvey asking about information for project.	Directed to BLM website for more information.
883	121	121.1		Gerth	9-NEPA	Call from Mr. Gerth expressing concerns about location of new route variations.	All route variations are described in section 2.7, and analyzed in chapters 3 and 4 of this EIS.
884	122	122.1	Zarpara Vineyard	Jorve	13-SOCI	1. Three more tasting rooms are on hold, making six total, pending disposition of the power line. Also, two vineyards and two homes are on hold. The tasting rooms on hold: Caduceus Cellars, Deep Sky, Kief-Joshua, Rhumbline, Send-Reckoner, and Gerths. Vineyards on hold: Kief-Joshua and Gerths. Homes on hold: Rhumbline and Gerths. (There are currently 11 vineyards on the Willcox Bench and 3 tasting rooms).	The EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.
885	122	122.2	Zarpara Vineyard	Jorve	9-NEPA	2. AZ G&F and BLM did not know about the vineyards. They have been looking at outdated Google Earth pictures, which do not show all of the vineyards. A simple drive out to the area would have shown them how the power line would be plowing through vineyards in a key economic development area. Further, there are landowners adjacent to the power line through the bench that say they didn't receive the December letter from the BLM that announced that a new route was under consideration. It may be that only those landowners in the direct path of the new route received those letters. This just goes more to the point that our community on the Willcox Bench has been denied the same process of vetting that the other routes were subjected to.	Representatives from BLM, Western, and AGFD conducted site visits to the Willcox Playa and Willcox Bench area in July 2014, January 2015, and May 2015. The May 2015 visit included a tour of 11 vineyards/landowner properties. In December 2014, letters were mailed to potentially affected property owners with parcels located within 0.5 mile of the proposed Project route variations. As noted in chapters 1 and 5 of the EIS, 35 comments have been received in response to the outreach letters. These comments have been addressed in the same manner as all public comments that were received on the Draft EIS. Based on comments received from the outreach letters and other similar comments from area landowners, the EIS includes a discussion and analysis of the Willcox Bench and vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry. The potential environmental impacts of the proposed Project and alternatives are described in chapter 4 of the EIS. Three visual simulations from area vineyards have also been added to appendix K of the EIS.
886	122	122.3	Zarpara Vineyard	Jorve	2-BIO	3. AZ G&F may think their job is done, but we need to get them back to the table. Black Forest Partners has ideas that the BLM and Western could use to work with AZ G&F to make the Proponent Preferred route acceptable to everyone involved. This is the route that follows an existing power line, and skirts the east and south banks of the Willcox Playa (and completely avoids the Willcox Bench). AZ G&F has an objection to just one specific point along that route, the place on the southwest edge of the Willcox Playa where they pump water to create a pond to attract the cranes. Black Forest suggested that the pond could be relocated. Also, we would like to see the reports which we were told AZ G&F has available which would serve to clarify their position on the P7 segment, e.g., detail numbers of birds killed by the existing power lines, number of sandhill cranes roosting at their pond, and the number of sandhill cranes present at the other roosting areas on the Willcox Playa. We would also like to see any analysis AZ G&F has of the Willcox Bench area.	BLM and Western met with representatives from AGFD and FWS in May and June 2015 to discuss their concerns regarding Project alternatives in the vicinity of the Willcox Playa Wildlife Area. AGFD has developed additional mitigation measures to offset impacts to wildlife habitat in the Willcox Playa area, specifically segment P7. AGFD mitigation measures, which include relocating Crane Lake, have been incorporated into the EIS as PCEMs in table 2-8. Additionally, the potential impacts of all Project alternatives (including the route variations) are considered in the EIS; specifically, potential impacts to sandhill cranes and their roosting sites are considered in sections 4.8.2 of the EIS.
887	122	122.4	Zarpara Vineyard	Jorve	9-NEPA	4. It's still not clear what the objections are to the northern route - the Proponent Alternative route, also known as the Environmentally Preferred Route. AZ G&F said they have no objections to the northern route.	The commenter is correct; the AGFD does not have objections to the northern route. As discussed in sections 3.11.3 and 4.11.3 of the EIS (Military Operations), there are military sensitivities to the northern route, specifically segments Ga, Gb, Gc.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
888	122	122.5	Zarpara Vineyard	Jorve	8-MISC	Again, we would like to host another tour, this time for the politicians representing this area, so that we can show you how devastating the power line would be to the wine industry on the Willcox Bench. Thank you for your time and attention to this matter.	Representatives from both Southline and BLM have attended a tour of the Willcox Bench and vineyards on separate occasions. Additionally, the EIS includes a discussion of viticulture as a land use in this region as well as a discussion of the potential economic impacts of and to the wine industry – see sections 3.11.1, 4.11.1, 3.15, and 4.15.
889	123	123.1	Robert S. Lynch & Associates	Lynch	8-MISC	This office represents the Arizona Wine Growers' Association. We are writing to you concerning a proposal first put forth last December to change the route of part of the proposed Southline Transmission Line to go through the Willcox Bench, the prime winegrowing area of Cochise County and the State of Arizona.	Thank you for your comment.
890	123	123.2	Robert S. Lynch & Associates	Lynch	9-NEPA	The Bureau of Land Management (BLM) and the Western Area Power Administration (Western) published your Notice of Intent to Prepare the Environmental Impact Statement (EIS) for this project on April 4, 2012. 77 Fed.Reg. 20411, et seq. You then published your Notice of Availability of your joint Draft Environmental Impact Statement (DEIS) on April 11, 2014. 79 Fed.Reg. 20224, et seq. The comment period closed on July 20, 2014. On December 15, 2014, you sent some landowners on and near the Willcox Bench letters advising them that the agencies had proposed a new route segment (P7a, P7b, P7c & P7d) not included in the DEIS proposals and alternatives and through an area not even evaluated for environmental and other impacts in the DEIS. It is our information that only landowners in the possible direct path of the new route were notified and adjacent owners were not.	Segments P7a, P7b, P7c, and P7d are considered variations of routes that were presented and analyzed in the Draft EIS. These minor route variations are further analyzed in detail in chapter 4 of the Final EIS. As noted by the commenter, letters were mailed on December 15, 2014 to landowners on and near the Willcox Bench. These outreach letters were mailed to potentially affected property owners with parcels located within 0.5 mile of the proposed Project route variations. As noted in chapters 1 and 5 of the EIS, 35 comments have been received in response to the outreach letters. These comments have been addressed in the same manner in which all public comments received on the Draft EIS were addressed; they are considered in the analysis presented in chapter 4 of the Final EIS and are included in the Project Record. Further, the potential impact of the proposed transmission line (including route variations) on property is described in chapter 4 of the EIS.
891	123	123.3	Robert S. Lynch & Associates	Lynch	9-NEPA	As you know, the Responsible Official cannot consider alternatives not discussed in the relevant environmental documents. Department of the Interior NEPA Regulations, 43 C.F.R. § 46.420. And BLM must solicit comments from affected persons. 43 C.F.R. § 46.435. Those solicitations must allow affected persons to provide comments "on the record", i.e., during the comment period. *Warm Springs Dam Task Force v. Gribble*, 621 F.2d 1017 (9th Cir. 1980). When that does not happen, the BLM NEPA Handbook dictates that the agency prepare a Supplemental Draft EIS. Handbook H-1790-1, Subsection 5.3.1, p. 29.	Segments P7a, P7b, P7c, and P7d are considered variations of routes that were presented and analyzed in the Draft EIS. These minor route variations are further analyzed in detail in chapter 4 of the Final EIS. Additionally, outreach letters were mailed on December 15, 2014 to potentially affected landowners with parcels located on and near the Willcox Bench within 0.5 mile of the proposed Project route variations. As noted in chapters 1 and 5 of the EIS, 35 comments have been received in response to the outreach letters. These comments have been addressed in the same manner in which all public comments received on the Draft EIS were addressed; they are considered in the analysis presented in chapter 4 of the Final EIS and are included in the Project Record. Further, the potential impact of the proposed transmission line (including route variations) on property is described in chapter 4 of the EIS. Though portions of the EIS have been revised to include route variations, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Further, even though additional reroutes were considered, ultimately the Agency Preferred Alternative includes the route identified and analyzed in the Draft EIS, and there was no need to prepare a supplemental EIS.
892	123	123.4	Robert S. Lynch & Associates	Lynch	9-NEPA	Supplemental EIS's and Supplemental Draft EIS's are often used by federal agencies, especially where a new alternative is to be considered. *Sierra Forest Legacy v. Sherman*, 646 F.3d 1161, 1169 (9th Cir. 2011); *Dubois v. U.S. Dept. of* Agriculture, 102 F3d 1273, 1292 (1st Cir. 1996); *State of Cal. v. Block*, 690 F.2d 753, 770 (9th Cir. 1982); NEPA Regulations, 40 C.F.R. § 1502.9(c)(1). Supplemental DEIS's or EIS's are mandated when either "(i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." Id. *Norton v. Southern Utah Wilderness Alliance*, 542 U.S. 55, 72 (2004); *Marsh v. Oregon Natural Resources Council*, 490 U.S. 360, 372 (1989); *People of the State of Cal. V. U.S. D.O.I.*, 9th Cir., No. 12-55856, May 19, 2014, Slip Op. 21; *Westlands Water Dist. V. U.S. Dep't of Interior*, 376 F.3d 853, 873 (9th Cir. 2004).	Segments P7a, P7b, P7c, and P7d are considered variations of routes that were presented and analyzed in the Draft EIS. These minor route variations are further analyzed in detail in chapter 4 of the Final EIS. Though portions of the EIS have been revised to include route variations, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Further, even though additional reroutes were considered, ultimately the Agency Preferred Alternative includes the route identified and analyzed in the Draft EIS, and there was no need to prepare a supplemental EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
893	123	123.5	Robert S. Lynch & Associates	Lynch	9-NEPA	In this case, both conditions have been met and both standards apply. The new route is a significant change in the only portion of the proposed line that is new construction and not a rebuild. It is a substantial change in the very portion of the line that has the significant impacts that have been the focus of the DEIS. This new area was not analyzed in the DEIS, let alone available for comment as an alternative. This is aptly demonstrated by the discussion of eliminating Local Alternative DC1, the discussion of which is totally lacking any discussion of the Willcox Bench which it would have impacted.	The addition of segments P7a, P7b, P7c, and P7d is not considered a substantial change; they are variations of routes that were presented and analyzed in the Draft EIS. The potential impacts of these minor route variations are further analyzed in detail in chapter 4 of the Final EIS. Additionally, outreach letters were mailed on December 15, 2014 to potentially affected landowners with parcels located on and near the Willcox Bench within 0.5 mile of the proposed Project route variations. As noted in chapters 1 and 5 of the EIS, 35 comments have been received in response to the outreach letters. These comments have been addressed in the same manner in which all public comments received on the Draft EIS were addressed; they are considered in the analysis presented in chapter 4 of the Final EIS and are included in the Project Record. Though portions of the EIS have been revised to include route variations, none of these revisions describe significant new circumstances or significant new information relevant to environmental concerns; therefore, no supplemental EIS has been prepared. Further, even though additional reroutes were considered, ultimately the Agency Preferred Alternative includes the route identified and analyzed in the Draft EIS, and there was no need to prepare a supplemental EIS.
894	123	123.6	Robert S. Lynch & Associates	Lynch	9-NEPA	Additionally, there is significant new relevant information. The Sun Zia Southwest Transmission Project has been approved by the Department of the Interior. Thus, the prior analysis discounting using a path parallel to Sun Zia (DN1, DEIS, p. 123; LD4, DEIS, p. 126) or purchasing line capacity in lieu of constructing a portion of the Southline EHV line (DEIS, p. 137-9) because of the uncertainty of that line's future (DEIS, p. 138) is no longer valid.	The SunZia project may have been approved by the Department of the Interior but as of publication of this EIS the project remains on hold.
895	123	123.7	Robert S. Lynch & Associates	Lynch	9-NEPA	We were curious how such a significant portion of the only segment of this line constituting new construction could be proposed *post hoc* for such a radical change without any recognition of the current development of the Willcox Bench.	The addition of segments P7a, P7b, P7c, and P7d is not considered a radical change; they are variations of routes that were presented and analyzed in the Draft EIS. Further, based on comments received from landowners in the Willcox Bench area, the EIS includes a discussion and analysis of the area's vineyards; see sections 3.10 and 4.10 (Visual Resources), 3.11 and 4.11 (Land Use, Including Farm and Range Resources and Military Operations), and 3.15 and 4.15 (Socioeconomics) for a discussion of the potential impacts to the area wine industry.
896	123	123.8	Robert S. Lynch & Associates	Lynch	8-MISC	One of our members reached out to the Arizona Game and Fish Department and Black Forest Partners, the project manager for Southline, and invited them for a tour. They came. Specifically, William Kipp and Doug Patterson of Black Forest Partners and Robert Fink, the Arizona Game and Fish Department Regional Wildlife Program Manager, and Gilbert Gonzales of the local Arizona Game and Fish Department office. Another of our members and a local couple joined the group.	Noted. BLM attended a similar but separate tour of the Willcox Bench area in May 2015.
897	123	123.9	Robert S. Lynch & Associates	Lynch	8-MISC	The group toured seven (7) of the vineyards, visited three (3) tasting rooms and saw two future vineyard locations. Apparently, neither the Arizona Game and Fish Department representatives nor the Black Forest Partners representatives had ever been there before. As it turns out, Arizona Game and Fish had been using outdated Google Earth pictures and it appears that BLM officials were accepting and relying on this erroneous information to the detriment of the EIS process.	Satellite imagery data used in the EIS analysis are the most current publicly available data. These were further supplemented with data collected during the May 2015 BLM field visit to the Willcox Bench and winery tour.
898	123	123.10	Robert S. Lynch & Associates	Lynch	8-MISC	Segment P7 was discussed. It was the Arizona Game and Fish Department's objection to it that caused BLM to propose, *post hoc*, the line segment directly through the most productive wine grape growing area of the state. As it turns out, the objection was only to a very small piece of that route that, as it parallels an existing power line, goes by, as does the existing line, an artificial pond that the Arizona Game and Fish Department maintains for the sandhill crane. Except for this, the Department had no objection to the rest of the P7 segment.	Per Draft EIS comment letters from the FWS (letter # 71) and AGFD (letter #67),route variations P7a through P7d would be farther away from known roost sites than P7 and would likely be at a location within the crane's flight paths where the birds are of sufficient altitude that a strike would be very unlikely. As a result of comments received from landowners in the Willcox Bench area, BLM and Western worked in coordination with AGFD and FWS regarding their concerns with segment P7. Meetings were conducted with AGFD in May and June 2015. Ultimately, the AGFD developed additional mitigation measures for segment P7 to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
899	123	123.11	Robert S. Lynch & Associates	Lynch	2-BIO	Discussion that day immediately turned to attaching devices to the line so that the birds could see and avoid it, Southline moving the pond for the Arizona Game and Fish Department, Southline constructing viewing platforms and paths, etc. In other words, they discussed the mitigation strategy to fix this single problem with P7, another subject missing from the DEIS. It is crystal clear that BLM has a path forward that can keep the EIS process on track. It is our understanding that Black Forest Partners and the Arizona Game and Fish Department will meet soon with BLM and Western to design an acceptable mitigation strategy for the pond, allowing a consensus return to P7 as the preferred segment for the line in this area. We applaud that effort and encourage quick development of the mitigation plan.	BLM and Western have indeed worked in coordination with AGFD and FWS regarding their concerns with segment P7. Meetings were conducted in May and June 2015 to discuss mitigation strategy. AGFD has developed additional mitigation measures for segment P7 to offset impacts to wildlife habitat in the Willcox Playa area, including relocation of Crane Lake. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8. Additionally, line marking devices attached to the line so birds could see and avoid it are included as a PCEM in table 2-8 and discussed in section 4.8.2 of the EIS.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
900	123	123.12	Robert S. Lynch & Associates	Lynch	13-SOCI	Once you have the mitigation plan agreed to so it can be included in the Final EIS, we ask that you notify those contacted in December and other nearby landowners that the December proposal is off the table. Then the six tasting rooms on hold can start construction. The two new vineyards can be planted. Two new homes currently on hold can be built and an important economic engine for Cochise County can continue to grow. And our concerns about the Southline Project will have been resolved.	The AGFD has developed additional mitigation measures for segment P7 to offset impacts to wildlife habitat in the Willcox Playa area. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8. Landowners in the Willcox Bench area who were contacted via the outreach letter are on the Project mailing list and will be notified when the EIS will be available and how to obtain copies.
901	123	123.13	Robert S. Lynch & Associates	Lynch	8-MISC	But let me be just as crystal clear that, if BLM continues to pursue this ill thought out line segment through the Willcox Bench, we will sue before we let you damage the livelihoods of Arizona Wine Growers' Association members like this. Please keep us advised of further developments.	Noted.
902	124[1]	124.1	Arizona Game and Fish Department	deVos	9-NEPA	As we discussed, the various alternatives for the Southline transmission line all have conflicts with existing interests and management activities; in the case of P7, the Department's concern is associated with impacts to Crane Lake and wildlife that use that area. That said, there appears to be a reasonable solution that offsets these impacts to the Arizona Game and Fish Commission-owned land when these mitigation projects are fully implemented. With this accomplished, the Department can support the proposed P7 alignment.	Noted; potential impacts to Crane Lake and the wildlife that use it are considered in sections 3.8.2 and 4.8.2 of the EIS. AGFD mitigation measures have been incorporated as Project PCEMs in table 2-8 of the EIS.
903	124[1]	124.2	Arizona Game and Fish Department	deVos	9_NEPA	This letter summarizes what we discussed regarding potential mitigation for impacts to the Departments Willcox Playa Wildlife Area (WPWA). I wanted to follow up with you and identify those mitigative measures that the Department staff developed based on resource needs in the area.	Thank you.
904	124[1]	124.3	Arizona Game and Fish Department	deVos	9_NEPA	The WPWA meets Resource Category 1 designation under the Department's habitat compensation policy (I2.3) with a compensation goal of no loss of existing in-kind habitat value, and a guideline recommending that all potential losses of existing habitat values be prevented. However, since WPWA is a wholly artificial habitat, it could be reconstructed elsewhere without permanent loss. Therefore, if reconstructed, and if the loss of temporal and associated impacts are mitigated with further enhancements to the wildlife area throught the life of the project, the Commission's intent in policies A2.16 and A2.13 will have been met and possibly exceeded.	Habitat compensation policy information has been incorporated into section 3.8.2 of the EIS.
904	124[1]	124.4	Arizona Game and Fish Department	deVos	9_NEPA	The Department proposes that Southline work with our staff and the BLM to implement a plan to achieve the following proposed objectives on WPWA: • Relocation of Crane Lake: Find a suitable location and, if necessary, acquier land for the reconstructed Crane Lake; fund the construction of the lake and associated infrastructure, revegetation, visitor facilityies, and fund operation and maintenance costs of the new lake and associated infrastructure for the life of the Southline Project, with renewal of that commitment upon future renewal of the project permit. • Pond renovation: Improve or prvide funding to improve riparian emergent wetlands on three historic ponds near Kansas Settlement Road. Wetlands will be constructed to Department specifications and adequately equipped with pumps, liners, and drains to ensure that wildlife values are maintained. • Vegetation management: Fund the removal of non-native flora and revegetation with native flora on WPWA. Mitigation implementation costs associated with the three catagories avove will include operation, maintenance, analysis, monitoring, cultural and environmental clearances.	Southline has agreed in principle to these mitigation measures developed by AGFD, and the measures have been incorporated as part of the Project PCEMs in table 2-8 of the EIS. Further, analysis in section 4.8.2 of the EIS has been revised to consider the application of AGFD mitigation measures.
905	125	125.1		Wenrick, B.	2-BIO	I am extremely upset that the BLM's preferred alternative would allow Southline to be routed directly adjacent to the Willcox Playa/ Cochise Lakes Globally Important Bird Area and the wintering grounds for Sandhills Cranes in Whitewater Draw, which draws upwards of 20,000 cranes every year. Willcox Playa and Crane Lake, within the northern portion of the Sulphur Springs Valley of Southeast Arizona, supports the second largest over-wintering concentration of Sandhill Cranes in Arizona, typically 4,000 to 9,000 birds. Cochise Lakes and an area of nearby alkaline lakes, also provide important habitat for a great number of bird species.. I have photographed Sandhills Cranes in the Valley for the past 23 years, and I have submitted Photos and Videos to many Groups across the country. Please do not ruin the habitat so important to keep the Sandhills returning to the valley. This area is as important a winter feeding ground as is Bosque del Apache NWR in New Mexico.	Chapter 2 of the EIS includes more information on how the Agency Preferred Alternative was selected. BLM and Western have worked in coordination with AGFD on development of mitigation measures to offset impacts to wildlife habitat in their Willcox Playa area including relocation of Crane Lake. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.

[1] Letter received on June 24, 2015 in response to coordination with AGFD during May and June 2015 as discussed in chapter 5, section 5.3.

Table 8-1. Comments on the Draft EIS and Agency Response (Continued)

Comment ID	Submittal No.	Comment No.	Organization	Commenter Last Name	Comment Subject	Comment on Draft EIS	Agency Response to Comments
905	125	125.2		Wenrick, B.	2-BIO	Collisions with utility lines and fences are a primary threat to populations of Sandhill Cranes wherever these lines infringe on airspace the cranes use in migration and their daily feeding forays.	As stated in chapter 2 and section 3.8 in the Draft EIS, an Avian Protection Plan would be a Project-tailored plan designed to reduce avian collision mortality that results from avian interactions with electric utility facilities. Mitigation measures proposed, including use of avian flight diverters, were included in table 2-7 (now table 2-8 in the EIS) and section 4.8 of the Draft EIS.
905	125	125.3		Wenrick, B.	9_NEPA	The Final EIS should analyze a new alternative route north of I-10 and avoid the Globally Important Bird Area of Willcox Playa and Cochise Lakes altogether.	As described in chapter 2 of the Draft EIS, alternatives around the Willcox Playa were analyzed. Additionally, local route variations have been included in the Final EIS (P7a, P7b, P7c, and P7d) in response to public and agency comments and concerns about impacts near the Willcox Playa. The potential environmental impacts of all alternatives considered in detail were described in chapter 4 of the Draft EIS.
905	125	125.4		Wenrick, B.	9-NEPA	Also, the FEIS should analyze burying the line for any alternative that crosses open water or flight paths from roosting areas to feeding areas.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to include a section on alternative construction methods, such as burying the proposed transmission line.
906	126	126.1		Wenrick, P.	2-BIO	I am dismayed that the BLM's preferred alternative would allow Southline to be routed directly adjacent to the Willcox Playa/ Cochise Lakes Globally Important Bird Area. This Globally Important Bird Area is not an appropriate location to site a new transmission line. Willcox Playa and Crane Lake, within the northern portion of the Sulphur Springs Valley of Southeast Arizona, supports the second largest over-wintering concentration of Sandhill Cranes in Arizona, typically 4,000 to 9,000 birds. Cochise Lakes and an area of nearby alkaline lakes, also provide important habitat for a great number of bird species..	Chapter 2 of the EIS includes information on how the Agency Preferred Alternative was selected. BLM and Western have worked in coordination with AGFD on development of mitigation measures to offset impacts to wildlife habitat in their Willcox Playa area including relocation of Crane Lake. AGFD mitigation measures have been incorporated into the EIS as PCEMs in table 2-8.
906	126	126.2		Wenrick, P.	2-BIO	Collisions with utility lines and fences are a primary threat to populations of Sandhill Cranes wherever these lines infringe on airspace the cranes use in migration and their daily feeding forays.	As stated in chapter 2 and section 3.8 in the Draft EIS, an Avian Protection Plan would be a Project-tailored plan designed to reduce avian collision mortality that results from avian interactions with electric utility facilities. Mitigation measures proposed, including use of avian flight diverters, were included in table 2-7 (now table 2-8 in the EIS) and section 4.8 of the Draft EIS.
906	126	126.3		Wenrick, P.	9-NEPA	The Final EIS should analyze a new alternative route north of I-10 and avoid the Globally Important Bird Area of Willcox Playa and Cochise Lakes altogether.	As described in chapter 2 of the Draft EIS, alternatives around the Willcox Playa were analyzed. Additionally, local route variations have been included in the Final EIS (P7a, P7b, P7c, and P7d) in response to public and agency comments and concerns about impacts near the Willcox Playa. The potential environmental impacts of all alternatives considered in detail were described in chapter 4 of the Draft EIS.
906	126	126.4		Wenrick, P.	9-NEPA	Also, the FEIS should analyze burying the line for any alternative that crosses open water or flight paths from roosting areas to feeding areas.	Section 2.9 (Alternatives Considered but Eliminated from Further Analysis) of the EIS has been revised to include a section on alternative construction methods, such as burying the proposed transmission line.