Appendix J Comments on the Draft EIS

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From: Sierra Club on behalf of [redacted].
To: BLM_NM_SunZia_Project
Subject: Please oppose the SunZia Southwest Transmission Project
Date: [redacted]

Aug 20, 2012

Mr. Adrian Garcia
PO Box 27115
Santa Fe, NM 87502-0115

Dear Mr. Garcia,

1 I am writing to urge the Bureau of Land Management (BLM) to adopt the No Action alternative for the proposed SunZia Transmission Line Project Draft Environmental Impact Statement (DEIS), which would not permit this project to be built on our public lands.

2 Although I support renewable energy and recognize the need to utilize some of our public lands for development and transmission of these resources, projects such as the SunZia Transmission Line would irreversibly damage unique and important ecosystems and should not be permitted. I strongly object to the proposed routes, including the preferred alternative, that threaten critical natural areas and cut through unfragmented lands, especially the routes traversing the Lower San Pedro Valley, the Aravaipa Canyon Watershed, and the Avra Valley.

The BLM, as the agency responsible for much of the public land in the West, should recognize the importance of these lands and should strive to protect the vital environmental values and resources found within them. Our transition to clean energy must not be at the expense of pristine wild lands, important wildlife habitat, or the quality of our water resources.

3 I question both the purpose and need for the SunZia project. The DEIS does not support the assertion that constructing the SunZia line will "encourage the development of additional renewable energy." There is no guarantee that this line would be used primarily for renewable energy, nor that those renewable energy sources would even be available. Similarly, even though the purported purpose is to transmit power from New Mexico to California, California has not stated that it is willing to purchase this energy, nor does it have the infrastructure in place to accept it.

4 Please select the No Action alternative. Our public lands, wildlife, air and water quality, and the many other resources that would be negatively affected by this project are too important to risk. There are much better ways and alternatives to truly promote renewable energy resources.

Thank you for considering my comments.

Sincerely,

[redacted]

Sierra Club Members' Form Letter

There were over 600 form letters received from members of the Sierra Club, the letter shown here is a representative image.

No.	Response to Comment
1	Comment noted.
2	The preferred route and all of the alternatives considered in the DEIS would avoid areas designated for the preservation of sensitive resources, including wilderness, wilderness study areas, areas of critical environmental concern, national wildlife refuges, and national parks and monuments. As stated in Section 2.5.4 of the DEIS, The BLM Preferred route was selected because it would maximize use of existing utility corridors and infrastructure, minimize impacts to sensitive resources, minimize impacts at river crossings, minimize impacts to residential and commercial uses, and minimize impacts to military operations within the restricted airspace north of the WSMR. A major portion of the preferred alternative would be constructed along established utility corridors where existing access is available. Approximately 56 percent (296 miles) of the route would be parallel to existing or designated utility corridors, including 220 miles parallel to existing transmission lines.
3	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity. Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.
4	Comment noted.

1474

Mountain Valley Ranch
San Antonio, NM 87832

SunZia Southwest Transmission Project - Comments

We are located in study area E 161 of the BLM preferred alternate route, which follows the present 115 Kv line in Socorro County, NM. Our property is lot [redacted] Willow Springs Ranch in the north part of the Pedro Armendaris Land Grant No. 34, lying north of Interstate 25. Our 160 acre property is bisected by the present 115 Kv line with two towers on our property. The developed home and headquarters site is located 900 feet west of the present line. With a 1000 foot right-a-way for the two proposed 500 Kv lines running parallel to the existing line, the new lines will run over our home site making our property totally worthless as a home site now or in the future.

It is with mixed feelings we approach these comments. We realize the country's need for development and distribution of more power. However, no one wants to be displaced by such development when they love their location, peace and tranquility it affords.

We located and purchased our property three years ago with the intent of developing a crossbreeding natural beef business while having a beautiful home with peace and tranquility by being 10 miles from the interstate on a gravel road with no phone lines or mail delivery.

My wife and I both have had high stress positions for years and needed to slow down and enjoy our retirement years and were doing just that and loving every minute of it.

The property had been partially developed by the previous owner who had to relocate because of his health. We have put a great deal of sweat equity and savings into completing development. Now having to give all of this up for progress is a very bitter pill to take.

We will need to be adequately compensated for our many loses.

1

1. Loss of total value of property and development.
2. Loss of peace and tranquility.
3. Loss of beef breeding program.
4. Relocating and moving expenses.

1474	Response to Comment
1	Right-of-way would be acquired according to the description provided in Section 2.4.9.1 of the DEIS. The standard mitigation measures described in Section 2.4.12 of the DEIS include certain measures that would restore or repair damage or disturbance to ranch facilities, for example ST-9, ST-13, and ST-21 (see Table 2-1 of the DEIS) would mitigate impacts to watering facilities, farm operations and fences or gates. On private lands, the Applicant or owners' representative would negotiate the amount and terms of compensation with individual property owners, that would include market value compensation for residual impacts.

1479

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

Lane Leard
NAME
P.O. Box 129
ADDRESS
San Antonio, N.M. 87832
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ☐ Yes ☐ No
Withhold personal information* ☐ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☐ No

COMMENTS:

It would have been much better if the speaker had spit his mouthful of marbles or rocks before he tried to talk.

1 What is your projected voltage loss on the line?

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

1479	Response to Comment
1	Line loss voltages are dependent on specific operation variables and have not been determined at this time.

1479

We have put a number of hours into studying the EIS for SunZia Southwest Transmission Project.

We have some questions that are not adequately addressed. The documents achieve a major amount of volume while managing to be impressively vague.

2 Under ES.4.5 Biological Resources in the Executive Summary, first on the bulleted list admits that fatal collisions are likely to occur with sandhill cranes and other large birds, no numbers are cited. We tried to search for any specific research or numbers and did not find any. In one point we saw "some" used for number of bird deaths: What number is "some?"

The report also surmised that even if birds are killed it will not "substantially" affect the population of the species. What number is "substantially", a percentage perhaps? In discussing mitigation measures, the report confirms that the species that travel in less than ideal lighting will be most affected.

We did not see a reference citing the numbers of birds using the flyway. New Mexico Game and Fish speculates that 363,000 not webbed birds use the flyway. Since as many as 20,000 geese and 50,000 ducks are frequently present during the winter season at Bosque del Apache NWR this could total 425,000 birds, or more, remembering that cranes and geese travel around the flyway: They don't just make a one way journey until spring.

What percentage of these – or perhaps better numbers – do you anticipate killing with the proposed powerlines? Is there an acceptable number in your plans? Should you exceed the acceptable number how would you remedy the problem? Take the lines down?

3 From another perspective, Arizona has 5 out of 10 of the sunniest cities in the USA.
They also have some impressive generating plans in motion using green energy generation. In addition they have new transmission facilities in an approval stage that look promising. Why, then, SunZia?

If my husband and I were skeptical people with many years of working on environmental issues, we would conclude that the only real beneficiary of this whole proposed atrocity is EPG for the enormous amount of blather they have generated. The smaller of the proposed routes affects more than 58,000 acres at tremendous expense. Damage to a flyway that has had hugely significant efforts made to provide the refuge at Bosque del Apache is nearly unthinkable. In case the feelings and business connections of the Socorro "locals" is of any value, this proposes to trash those issues, too.

We realize that President Obama has put this on one of his fast track lists. He is a fine young leader but has been distracted by a couple wars, economic crash and adamant opposition. This is a mistake he has made along with choosing Secretary Chu and AG Eric Holder. As loyal citizens it is our duty to provide him some guidance on this matter. The preferred alternative is No Action.

Lane and Skeeter Leard P. O. Box 129, San Antonio, NM 87832 theartist@qwestoffice.net

Socorro

1479	Response to Comment
2	Appendix B-2 of the DEIS presents the results of a study conducted by biologists from the University of New Mexico, attempting to estimate the collision risk to wintering cranes and waterfowl along the Rio Grande.
3	The Applicant's objective is to provide a path for energy delivery from areas of undeveloped renewable resource potential to load centers in the western United States. The range of alternatives considered includes potential transmission line routes that could provide electrical interconnections with renewable energy resources located primarily within the Qualified Resource Areas (QRAs) for wind energy, in south-central New Mexico, and the QRAs for solar energy located in southwestern New Mexico (e.g., BLM designated Afton Solar Energy Zone) and southeastern Arizona.

1487

1487

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

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JUN 19 2014

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

[redacted]
NAME
[redacted]
ADDRESS
[redacted] [redacted] [redacted]
CITY STATE ZIP

Avra Valley Coalition
Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ■ Yes ☐ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:
The SunZia Project has been based on misinformation, on smoke and mirrors, from the start. "Renewable energy" transmission is speculative, and there is none in the project. The jobs study has been shown, to the satisfaction of its chief author, to be seriously flawed and overstated. The DEIS is nothing less than a sales pitch for a questionable project that will have major negative impacts on communities and wildlife.

1 The DEIS addresses threats to wildlife in the most general terms, except when it states that fatal collisions of sandhill cranes with the power lines "are likely to occur." That threat is then dismissed as not impacting the sandhill crane population.

2 The DEIS states that there are no jaguarundi in the San Pedro area, despite sightings over time of a mated pair by wildlife biologists. Ocelots make their homes there as well, and the San Pedro is a likely travel corridor for jaguars. The DEIS states that threats to those rare mammals would be "a posted reasonable construction speed limit."

SunZia has attempted legislatively to bypass Arizona's regulatory authority. They have lied, on camera, about going after federal funds. They have spent hundreds of thousands of dollars on lobbyists. Their parent companies have not a single "green" project in their portfolio, a list including dirty coal power plants, Gulf oil rigs, offshore chemical plants.

3 The DEIS proceeds on the flawed assumption that the SunZia Project is necessary to transmit and sell power to California. That state has said that they have sufficient renewable energy resources of their own and do not need SunZia.

We need renewable energy and there are ways to have it and transmit it that will not have the negative impact that SunZia will have. These new 500 kv, two-tower with 1,000-foot rights-of-way transmission lines simply do not belong in Southern Arizona. There are better ways, and the BLM knows it.

[redacted] 6/17/2012 ■
Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

1487	Response to Comment
1	Comment noted. Chapter 3.6 of the DEIS discusses existing conditions and ways that wildlife may be affected by the Project. Appendix B-2 of the DEIS discusses information regarding the collision risk for birds along the Rio Grande.
2	No sightings of Jaguarundis in Arizona have been confirmed (physical evidence or photographs), and the USFWS determined that Arizona is not a part of the species' historic range based on the lack of evidence. However, the DEIS (Section 3.6.6.1) discusses the species out of prudence and in recognition of the numerous unconfirmed reports of the species. As discussed in the DEIS (Section 4.6.4.5), impacts to Jaguars and Ocelots can be acknowledged as something that may occur, but cannot be reasonably predicted. Without an expectation of when and where listed cats are likely to occur, mitigation cannot be designed beyond safe construction practices for any large mammal species.
3	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.

1488

- Andrea Blodgett
- 79 Duke Lane, Lemitar, NM 87823-9730
- 6 May 2012

- BLM Socorro Field Office
- 901 South Highway 85
- Socorro, NM 87801

RE: DÉJÀ VU—DIDN'T WE ALREADY HAVE THIS DISCUSSION?

Greetings:

1 SO just **WHY** is the "Proposed Sun Zia East Substation" located near Corona? I was not aware Corona had become a power hungry metropolis since my last visit.

And what of all this maze of transmission lines? If Truth or Consequences OR White Sands Missile Range needs power there should be solar and wind energy available in the nearby area. There are more than adequate wind and solar options for local power in the Deming and Lordsburg area without running transmission lines thru all NM.

And then we go to Arizona and I wonder **WHY** "Proposed Willow 500 KV *Substation*" and the "Pinal Central Substation" aren't serving just Arizona. WHY should any of these installations even be connected to New Mexico.

WHY aren't solar panels and wind turbines being considered for service to the immediate areas that need the power? What is the current loss per mile in power transmission? Lots of transmission lines not only trashes the landscape but is also high maintenance over the long term. Additionally **IF** the US is ever under attack loss of power throughout an extended area would be detrimental to defense.

WHY can't *WE THE PEOPLE* get rid of this power hungry group that wants to trash our whole neighborhood? ER, "Land of Enchantment" *OR*, land of high wires?

Andrea Blodgett

COPY: SunZia Southwest, LLC and lots of others

RCVD JUN 15 2012

1488	Response to Comment
1	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS. Construction and operation of the SunZia Project would not preclude installation of solar panels for local energy development needs.

1493

1493

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

[redacted]
NAME
[redacted]
ADDRESS
[redacted] [redacted] [redacted]
CITY STATE ZIP

Windmill Ranch
Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ■ Yes ☐ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:
1 My property is in close proximity to the windmill farms and transmission lines. If in the future, there a serious adverse effect to my property value will there be any compensation? It was stated the purpose of this development is to transmit power to the western states. What are the advantages to us in the Lincoln county of New Mexico?
2 Sincerely [redacted]

RECEIVED
JUN 13 2012

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

1493	Response to Comment
1	On private lands, the Applicant or owners' representative would negotiate the amount and terms of compensation with individual property owners, that would include market value compensation for residual impacts.
2	Economic impacts attributed to the project are described in Section 4.13.4.3 of the DEIS, which includes a description of employment and tax revenues that would accrue to counties in New Mexico (Route Group 1 includes Lincoln County). More detailed listings of economic effects can be found in appendices G1 and G2.

1496

1496

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

Diane Tuck
NAME
14125 N San Pedro River Rd
ADDRESS
Benson (Redington) Arizona 85602
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ☐ Yes ■ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:
I live on the west side of the San Pedro River in Redington. My family property seems to be in the general area of your proposed power line.
1 I am concerned about the health effects of such a line and the impact it would have on the birds and other wildlife in this very important riparian area along with the impact it will have providing access to people wanting to tear up the land with their ATVs and 4 wheelers.
2 None of your maps show me exactly where you propose to put your power line.
Where exactly does your BLM preferred alternate route run?
3 Are you planning on following the existing road or following the pipeline or slashing a new road through pristine land?
What if our land lies in your 'preferred route' and we refuse to give you a right of way through our land?
4 How can you guarantee to me that this will not negatively impact the environment which hangs in a delicate balance as it is, and that it will be far enough away from people's homes as to not impact their health?
5 Why is this route preferred over going through Tucson? This route appears to be longer thus more expensive than a more direct route would be.
Can you offer any benefits to the San Pedro Valley and it's people by having this power line here?
I'm sure other's have informed you of the importance of this one remaining riparian habitat and major flyway for migrating birds.
I won't repeat what you've certainly already received on that subject.
Do you have any concern for that at all, or can you only think of the money to be made off this project?
I would appreciate an answer to my questions before the San Manuel meeting please.

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

**Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.*

1496	Response to Comment
1	Comment noted.
2	Preliminary engineering, including exact locations of structures, will be completed prior to the grant of right-of-way. Maps in the Map Volume (Figure M1-1, M3-1, etc…) illustrate the location of the centerlines of the preferred route and alternatives to the accuracy of the map scale. Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance.
3	On private lands, the Applicant or owners' representative would negotiate the amount and terms of compensation for right-of-way with individual property owners.
4	The DEIS analyzes and discloses potential effects of the Project, and describes mitigation measures that would be implemented to minimize or avoid significant impacts. No significant health effects would be likely to occur (health and safety effects are documented in Section 4.15 of the DEIS).
5	The BLM Preferred route (Subroute 4C2c) is approximately 11.7 miles shorter than the Tucson route (Subroute 4C3). This route was selected (as stated in Section 2.5.4 of the DEIS) as the BLM preferred alternative because it would maximize use of existing utility corridors and infrastructure, minimize impacts to sensitive resources, minimize impacts at river crossings, minimize impacts to residential and commercial uses, and minimize impacts to military operations within the restricted airspace north of the WSMR.

1499

1499

SunZia Southwest
TRANSMISSION PROJECT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

[redacted]

CITY STATE ZIP

Organization (if applicable)
Add to mailing list ☑ Yes ☐ No
Withhold personal information* ☑ Yes ☐ No
Receive notification of EIS availability? ☑ Yes ☐ No

COMMENTS:

1 I am a bit miffed The BLM agency of The federal government would value wildlife over human life. Why dont you run Those Transmission lines where humans don't live instead right across The one populated area in The region. There is a large swath of land 30 miles south of Socorro where Those lines could cross I-25 + no one would object. I am not a NIMBY but it seems like no one is Taking into account That humans will be adversely affected by these unsightly, not necessarily safe to live by Transmission lines. [redacted]

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

1499	Response to Comment
1	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. The alternative routes located south of Socorro and east of I-25 (subroutes 1C1, 1C2 and 1C3) would cross either wilderness study areas or military lands that were excluded for new rights-of-way. As stated in Section 2.5.4 of the DEIS, the BLM Preferred route was selected because it would minimize impacts to sensitive resources and minimize impacts to residential and commercial uses (as well as other factors).

1503

Sunzia Southwest Transmission Project
c/o EPG, Inc.

To Whom it may Concern;

In regards to the positioning of power lines Preferred route and Alternative BLM routes.

I have attached a copy of your proposed map. I have marked our location, **Gammon Gulch Movie Set & Museum** and Mescal movie set location on this map.
Link in purple and red is our major concern to our business is shown on map ,***Link F40a*** in purple color and ***BLM Preferred Route*** in red.

1 The proposed power towers of 350' to 400' on this route would be clearly seen at our locations and would be in the line of Production filming of any kind at our Movie Set location.

The lines at one point would be less the 3/4ths of a mile due west and north west from us, clearly interfering and restricting our view in either direction. ***Link F40a*** in purple

We already have existing polls less then 2 miles away do north of us.
If you add the 350 ft. power poles to the existing poles due north on **BLM Preferred Route,** productions would loose our Northern view totally.

Poles to the North or West of us of that height (350" or more) would clearly restrict our business and could cause us financial loss.

We do an average of 3 movie productions a year **(a list of production activities is attached).**
This has brought an average of ***$1,000,000.00*** in revenue to business's in Benson and Cochise County.
(Attached letters from Productions)

(This is revenue produced by Productions done at Gammons Gulch and does not reflect income coming into Gammons Gulch from the Productions.)

Again, this will also affect Mescals Movie Set, owned by Old Tucson Studios. Many famous movies such as "Tombstone, The Quick & the Dead" and 100's of other movies over the years that have been made at that location. ***Link F40a*** in purple

Times are tough enough for Movie Production in Arizona with the governors failure to pass the Production incentive program. Please don't add to our weakening Production economy by adding unsightly towers to interfere with our beautiful locations.

Please take our requests for no more added lines around or near our locations seriously.
Our business could be forced to close down with the addition of the proposed new lines.

Thank you for taking time to review our request.
Sincerely,
John & Joanne Gammons, owners
Gammons Gulch Movie Set & Museum
331 W. Rockspring Lane
Benson, Arizona, 85602 (520-212-2831)

1503	Response to Comment
1	Typically the proposed transmission line towers would be 135 feet up to a maximum height of 170 feet. The visual impacts for the Subroute 4C3 corridor (including Link F40a near Gammon's Gulch) are described in Section 4.9.3.3 of the DEIS. As stated, "Class A Scenery associated with the San Pedro River would have moderate impacts because Link F40a would parallel two existing 345 kV transmission lines." The impacts would be similar for views from Gammon's Gulch. Note that Subroute 4C3 is not the BLM Preferred Alternative.

1513

From: Joyce Hostetter
To: BLM NM SunZia Project
Subject: Sunzia project
Date: Sunday, August 12, 2012 1:39:40 PM

To whom it may concern:

Am a resident of Tucson and past resident in the Benson, AZ area. I continue to go to the Benson and surrounding areas for my 'country fix' and to ride horses on many trails around and about that area. I am very familiar with the Sunzia project having attended public meetings required of them. At first it seemed that the main issue was 'where' the project power lines would go - what route would be best. By now after many people have delved into the nuts and bolts of what Sunzia is actually doing and I am much more greatly informed, I must submit my decision is that Sunzia SHOULD NOT continue anywhere. There are a great many reasons, most of which are as follows: 1

~ SunZia does not have fully funded backing – it originally said there would be no taking of government funds but would now receive gov't funding. With our national debt, I as a taxpayer see no sense to add more for no gain to the citizens and only gain for the corporation and its backers/investors.
~ Calif has its own renewable plans and has said publicly it doesn't need this transmitted power.
~ SunZia's purpose is highly suspect with no proof that citizens in any area will profit from this both with power and financially. Some may have added jobs in specific areas but it does not appear to add enough to make the benefit outweigh the deficits.

As for the areas that SunZia is proposing to place their power line routes, none appear to be without huge impact. Some routes will impact private homes and yards, other routes with impact wilderness areas & wildlife which damages quality of life in a number of ways which would take a whole other page of study results of which I am sure of which BLM is already acutely aware. Please note the following pertaining to this issue: 2

1513	Response to Comment
1	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.
2	Comment noted.

1513

~ The major national environmental groups, Grijalva and Giffords recommend NO ACTION.

As for the route through the central San Pedro Valley, there are a great many reasons this should not be a chosen route as routes are being considered (again no routes should be considered, only shutting this Sunzia project down is the only right answer). Reasons not to use the central San Pedro Valley is as follows:

~ The middle San Pedro valley is being considered by Fish and Wildlife Service as a refuge. With this happening, BLM should be working with Fish and Wildlife Service as both should have the best interests of wilderness and wildlife foremost in their minds and actions. 2

~ Habitat fragmentation is a major issue for many species when roads to and underneath power lines are bladed – at present major mammals travel in an unfragmented habitat from the river to both mountain ranges east and west.

~ Other than the Grand Canyon national park, the middle San Pedro is the second largest unfragmented region in the state with the Aravaipa wilderness (the route SunZia prefers as it would cost less) containing NO ROADS.

There is far more damage that would happen to the quality of life for all people whether living in or near the area of the wild lands, using the lands for recreation and appreciation, and for just knowing with the peace of mind that there is open land and not cities upon cities.

Please read all the above and all that you receive from others and digest it. Once all the facts are understood, there is no way anyone could possibly see any justification to this Sunzia project. It is profit to those who are involved in it from investors to management - all receiving profit from it with little to no gain to the people who this project will effect. It is another 'bridge to nowhere'. If put to a public vote by people in and around these project routes proposals if completely informed, would not doubt vote in a huge majority against this Sunzia project. That includes large and small cities as well as rural residents/citizens/taxpayers.

I propose and insist on the Sunzia project to be stopped. No Action is the answer

1513	Response to Comment
	See following page(s)

1513

to Sunzia.

Sincerely,
Joyce B. Hostetter
8410 E. Pima St.
Tucson, AZ 85715
520-991-8706
loveofthehorse@gmail.com

This again leads me to

1513	Response to Comment
	See following page(s)

1514

From: PATRICK CRANE
To: BLM_NM_SunZia_Project; edwin_singleton@nm.blm.gov; pperley@nrao.edu; gbtaylor@unm.edu; Namir Kassim; pcrane17@msn.com; krehbiel@lbis.nmt.edu
Subject: Comment on the Draft EIS/RMPA for the SunZia Southwest Transmission Project
Date: Saturday, August 11, 2012 1:56:57 PM
Attachments: LWA Memo No. 168 - EHV RFI.pdf

11 August 2012
1206 Lewis Drive
Socorro, NM 87801-4819

Bureau of Land Management
New Mexico State Office
SunZia Southwest Transmission Project
P.O. Box 27115
Santa Fe, NM 87502-0115

Re: Comment on the Draft EIS/RMPA

Gentlemen:

Thirty years ago El Paso Electric (EPE) proposed building a 345-kV extra-high-voltage (EHV) transmission line from St. Johns, AZ to Deming, NM. The route proposed would have run from St. Johns to intersect US 60 east of the AZ-NM border, east along US 60 to the intersection with NM 78 (now NM 52), south along NM 78 and NM 52 to the vicinity of Winston, NM, and ultimately to Deming.

This proposal would have caused great concern at the National Radio Astronomy Observatory (NRAO) because transmission lines are a well-known source of radio-frequency interference (RFI) to radio telescopes and because the route proposed would have passed very close to two of its telescopes: the Pie Town antenna of the Very Long Baseline Array (VLBA) radio telescope and through the center of the Very Large Array (VLA) radio telescope located near the intersection of US 60 and NM 78. Subsequently, the Bureau of Land Management (BLM) contacted an outside consultant to study the issue as part of the environmental impact study. The consultant, V.L. Chartier of the Bonneville Power Administration, was an expert on the environmental effects of EHV transmission lines. He and the NRAO concluded that corona discharge from the EPE transmission line would represent a serious threat of RFI to the NRAO's radio telescopes and recommended minimum separation distances of 1.7 miles and 7.0 miles from VLBA and VLA antennas,

1514	Response to Comment
	See following page(s)

1514

respectively (Chartier, 1984, BPA Report ER-84-18). The route adopted for the EPE transmission line was shifted significantly away from the original route and from the radio telescopes.

The issue of RFI from EHV transmission lines was not unique to that time, those telescopes, and that transmission line; it should have been addressed in the Draft EIS/RMPA for the SunZia Southwest Transmission Project. In New Mexico and Arizona other radio telescopes are located on the campus of New Mexico Tech in Socorro, on Mt. Graham near Safford, AZ, and on Kitt Peak outside Tucson, AZ. All should have been identified and contacted, and the potentials for RFI evaluated. Furthermore, as must have been noted in earlier consultations with the University of New Mexico (UNM) and the Naval Research Laboratory (NRL), construction of the Long Wavelength Array (LWA) radio telescope by a consortium led by UNM has begun. Several possible LWA sites were located near the route originally proposed for the SunZia transmission line; the new preferred route passes near other possible LWA sites.

1 The issue of RFI to radio telescopes from the SunZia transmission line is a serious one that should be addressed in the environmental impact statement for the Project. To update and generalize the 1984 report by Chartier, I prepared LWA Memorandum No. 168, "Radio-Frequency Interference (RFI) from Extra-High-Voltage (EHV) Transmission Lines." This memorandum provides background about coronal discharge and describes and implements the current version of the BPA model used by Chartier in 1984. Based upon a well-documented EHV configuration operating at 510 kV, a minimum separation distance of 10 miles for both LWA and VLA antennas is a useful initial guideline. However, determination of an exact distance requires detailed design specifications for the transmission line. And note that a pair of transmission lines is worse than a single one, and DC transmission lines produce lower levels of RFI than AC transmission lines.

This issue should be considered nationwide for new EHV transmission lines. There are many other radio telescopes around the country that are funded by the federal and state governments and by private institutions. The Committee on Radio Frequencies of the National Academies of Sciences maintains a list of many significant radio telescopes (sites.nationalacademies.org/BPA/BPA_059065). However, that list overlooks many radio telescopes, notably those that are operated by amateur radio astronomers (Society of Amateur Radio Astronomers, www.radio-astronomy.org) and as student projects (Radio Jove, radiojove.gsfc.nasa.gov).

For your information I have attached a copy of LWA Memorandum No. 168 referred to

1514	Response to Comment
1	The VLA and LWA are approximately 30 miles west of the BLM Preferred Alternative route, and therefore would not cause radio interference conflicts.

1514

above (which also can usually be found at www.ece.vt.edu/swe/lwa/memo/lwa0168.pdf). I previously submitted a copy to Melissa Goldin at the Socorro Field Office.

Sincerely yours,

Patrick C. Crane

1514	Response to Comment
	See following page(s)

1518

From: Douglas R. Newton
To: BLM_NM_SunZia_Project
Subject: Placement of SunZia Transmission Lines
Date: Thursday, August 09, 2012 11:08:55 AM

Dear Sir:

I recommend strongly that these transmission lines not be placed in riparian areas including Arivaipa Canyon or the San Pedro River for the following reasons:

1) These riparian areas are very rare in Arizona and the southwest and are extremely important for animal life such as birds and mammals to be able to migrate into and within these corridors.

1 2) I am very concerned with the continued fragmentation of natural areas from the building of roads and destruction of vegetation from the placement of these transmission lines thus preventing large mammals from migrating between ranges and breaking up of home ranges of small mammals, reptiles, and birds.

3) Placement of these transmission lines will cause disturbance to riparian areas, destruction of vegetation, and introduction of invasive non-native species into these areas.

2 4) These transmission lines should be made to follow existing corridors of electric and gas lines that already exist, such as along Interstate 10, rather than creating new corridors. If these new corridors are allowed, then other transmission lines will want to follow thus creating additional disturbance.

Thank you.

Douglas R.Newton
4812 south Fair lane
Tempe, Az. 85282

1518	Response to Comment
1	Comment noted.
2	Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance. Approximately 296 miles (56%) of the BLM Preferred Alternative would be parallel to existing or designated utility corridors, as stated in Section ES.3.4 and shown on Figure M10-4 Utilities of the DEIS. Future proposals for new utilities would subject to separate evaluation and approval by the appropriate regulatory and land management agencies.

1520

From: Joe Keefe
To: BLM_NM_SunZia_Project
Subject: Comments Re: SunZia Proposed Project
Date: Tuesday, August 07, 2012 12:55:02 PM
Importance: High

Having attended your Corona, NM Public Meeting and studied the issues involved, I provide the following comments, and propose that the project be amended or canceled.

1) While the proposed project is clearly delineated as to the construction of plants and lines from near Corona, NM, to near Casa Grande, AZ, nobody involved in the project could inform attendees as to the routes and means by which electricity is to be brought to the Corona area (SunZia East Substation), and what precautions will be made to ensure the safety of area residents and the natural resources of the area. 1

2) Nobody involved in the project had any idea of additional training, tools, and equipment to be provided to local and regional fire and emergency management agencies who will be responsible for the safety of structures and people along the proposed route, nor and funding to be provided for the upgrading of the emergency response equipment needed to adequately protect residents and businesses in the areas involved. 2

3) Little if any involvement and/or notification was made to residents of Torrance County, NM, despite the fact that much of the anticipated feed lines will be coming from Torrance County existing and proposed power systems, including the existing High Mesa system. These feed lines will have to cross through numerous residential areas and will require upgrading and training of fire and emergency service agencies throughout the county. What is proposed to accomplish this? 3

4) The routing of lines to the north of Salinas Pueblo Missions National Monument presents a threat to the endangered forest areas as well as sacred Indian ruins that are known to rest upon a cavern or series of caverns similar to Carlsbad Caverns National Park – what guarantees is the sponsoring entity making to ensure that there is no cavern system under the proposed route that might collapse at some future date and endanger residents from the Torrance/Lincoln County lines as far north as Mountainair? 4

This proposal, while on the surface seems positive for the people of metropolitan Phoenix, has the potential to create havoc upon the residents of Central and Southwestern New Mexico. I urge that it be canceled or delayed pending confirmation of safety and other factors that can greatly affect the residents and natural features of the State of New Mexico.

Joe Keefe
P.O. Box 364
Corona, NM 88318
(Torrance County)
(575) 849-2793
grizjoe@me.com

1520	Response to Comment
1	Future proposals for other transmission lines in the Corona area would subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
2	Comment noted.
3	Comment noted. Please also see response to Comment No. 1.
4	No effects to endangered forest areas, or any known ruins or caverns have been identified with respect to the BLM Preferred Alternative.

1526

From: Jim Notestine
To: BLM_NM_SunZia_Project
Date: Monday, August 06, 2012 3:07:16 PM

I am adamantly opposed to the proposed powerline routing thru the San Pedro for the following reasons:

1 • SunZia and the BLM appear to be greenwashing this line as a renewable energy project, but there is no guarantee that the energy it transmits would be derived exclusively – or even primarily – from renewable energy sources.

2 • The BLM's preferred route cuts through the San Pedro River Valley, which supports the last major free flowing river in the desert southwest, the main migratory corridor for neo-tropical birds in the West, and the greatest diversity of mammal species in North America.

3 • The Aravaipa alternative route would impact the Aravaipa Canyon watershed by cutting through it for more than 20 miles, crossing Aravaipa Creek and fragmenting connectivity between two wilderness areas, Aravaipa Canyon Wilderness and Galiuro Wilderness.

4 • This line threatens to impact many conservation areas where there has been considerable public investment, including Pima County's Six Bar Ranch and A-7 Ranch, both part of the Sonoran Desert Conservation Plan.

5 • SunZia insists that it can't use existing rights-of-way along Interstate 10 for the alternative route through Tucson; however, their main obstacle to using this route is merely some added time and expense that would affect the company's bottom line.

Sincerely,
James E. Notestine
6432 E Brian Kent
Tucson, AZ 85710-1108

1526	Response to Comment
1	Comment noted.
2	Comment noted.
3	Comment noted.
4	Comment noted.
5	Alternative transmission line routes were considered within the I-10 corridor including portions of Subroute 4C3. Generally there is insufficient area available for the proposed right-of-way adjacent to I-10 because of existing residential, commercial and industrial development located along the highway, and therefore other potential alternatives following I-10 were eliminated from consideration.

1528

SunZia Southwest Transmission Project

Agency/Docket Numbers:
NM-114438
AZA-35058
L51010000 ER0000 LVRWG09G0690 LLNM930000

PLAN OF DEVELOPMENT

Page No	Comment
A1-10	Mentions burying Fiber Optic Lines too, where are these going to be buried, the whole route?.
A3-5	Mentions blocking OHV Access
A5-6	Says roads will be gated or blocked - neither is really going to stop them
?	Mentions NESC standards that require clearing about every 10 years for this veg. type. Nothing over 15' tall is allowed. Talks about removing old Saguaros that will not transplant could they be mitigated by planting a new one? In the DEIS, it says that vegetation will be cut to 12'. Who makes the final decision, considering the sag in the lines etc. Who will make the decision on the western segment over Arizona State Trust Lands?
A6-7	Says that revegation must be quick. What is quick in the desert?

SECTION 4-17 CUMULATIVE EFFECTS

	Page No	Comment
1	4-190	Table 4-11 says that existing land use plans have a high impact. Yet with many existing plans such as General Plans and Conservation Plans, you place the transmission line in low impact on land use
2	4-228	address the Southline Project in more detail
3	4-255	mentions the Western Army National Guard Training site, but they are not on the military maps. I think they fly over the San Pedro Valley.
4	4- 268-275	no definite sources of renewable energy. The tables and text say it all. Two thirds of all of the projects that would use this line are not projects in the foreseeable future. There is not real support for an argument that this line is for renewable energy. Plus it must allow access to other forms of energy generation.
	4-284	the paragraph where the Cascabel Working group raised issues about erosion from new roads dismisses this by saying they will be engineered to prevent this. Out in this area, roads = erosion. Or they alter the watershed's hydrology to produce it some where else.

#/

1528	Response to Comment
1	As stated in Section 4.10.2 of the DEIS, "Residential areas where the Project would physically conflict with planned subdivisions…" would result in high impact. Location of the Project in other areas planned for recreation or preservation use would have a high-moderate level of impact. Low impacts occur where there are no specific conflicts identified with land use plans.
2	The information regarding the proposed Southline Project has been updated in Chapter 4.17 of the FEIS.
3	The Western Army National Guard Training site is listed in Table 4-30 of the DEIS to indicate impacts that have resulted from this particular site, located northwest of Marana (Marana Airport), that are considered within the cumulative area of analysis for the project.
4	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services…" and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.

1528

5 4-290 this page plays down the amount of water needed to generate solar power. Since most of the projects are in the far future, how can you say what technology they will use and what the water use is. A lot of solar technology is water intensive and that is the trade off no one wants to talk about. Clean air, increase water use.

6 4-294 please rephrase the comment that grazing has a cumulative impact on forage for Antelope, that maybe a left over wives tail. NRCS, BLM, and many private ranches have a management system that builds in such things as Animal Management Units (pg 3-223 of draft eis). They monitor the pastures to predict what amount of grazing can be supported.

7 4-311 mentions connecting to the Southline. They are so similar from Benson to Deming. This corridor is SO full of lines now. Are they really planning to connect to the Southline?

OTHER COMMENTS

8 When will you address conflicts to Agency and Municipal plans?

You are kidding your self if you think any amount of mitigation (boulders, gates, fences, ditches or signs) are going to keep this project from blowing the land wide open for OHV abuse.

#2

1528	Response to Comment
5	As stated on page 4-290 of the DEIS, PV solar facilities require a relatively small amount of water; whereas, solar thermal installations require a larger amount of water. The actual water use for future solar projects has not been predicted.
6	The statement regarding grazing impacts refers to historic trends of cattle grazing that may have caused decline in both food and habitat for wildlife.
7	It has not been determined whether any of the future projects listed in table 4-39 (page 4-311 of the DEIS) have proposed to interconnect with the Southline Transmission Project.
8	Effects to the BLM Resource Management Plans and proposed amendments are identified in Section 4.18 of the DEIS. The potential effects to municipal plans were identified in Section 4.10.5 of the DEIS.

1530

From: Ronald Parry
To: BLM_NM_SunZia_Project
Subject: SunZia Project
Date: Monday, August 06, 2012 11:59:45 AM

Dear Sirs:

I have reviewed the issues surrounding the SunZia project. It is clear that the project will have major, negative environmental impacts on the San Pedro Valley. It is also clear that the BLM has not be forthright in its public stance on this project. There is no convincing evidence that the proposed transmission lines would primarily carry energy generated from renewable sources. Indeed, it appears that the real purpose of the proposed project is to provide transmission capacity for a gas-fired, non-renewable power plant in Bowie. Let's be honest. This project is a bad idea and should be scrapped. [1]

Yours Sincerely,

Ronald Parry
Professor of Chemistry Emeritus
Rice University
Houston, Texas

1530	Response to Comment
1	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity. Several alternative routes connecting New Mexico and central Arizona were evaluated in the siting studies for the proposed SunZia 500 kV transmission lines conducted during the scoping process. Some of the alternatives (including the Preferred Alternative) were co-located along the existing TEP 345 kV transmission line corridor, which is considered a siting opportunity for new transmission lines. The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation.

1535

From: austranne@powerc.net
To: BLM_NM_SunZia_Project
Subject: comment on Sun Zia EIR
Date: Sunday, August 05, 2012 4:45:13 PM

I oppose the Sun Zia power line project for the following reasons:

1 **1. Impact upon a unique and sensitive environmental resource.** SunZia will create an entirely new corridor down the San Pedro River Valley with an accompanying road for a minimum of 30 miles. This corridor will become the principal transmission corridor in the Southwest and will likely be expanded in the future, further increasing impact. This route was selected over the strong objections of valley residents, ranchers, conservationists, and political representatives.

2 **2. Misleading statement of purpose and need.** The Southwestern Power Group proposed the SunZia Project to provide transmission capacity for its yet-to-be-build 1,000-MW natural gas-fired Bowie power plant. SWPG would not have proposed the project had the Southwest Area Transmission Planning Group (SWAT) not proposed a line through the plant's location to satisfy New Mexico Governor Bill Richard-son's request to export wind energy. Neither SWPG nor the BLM has acknowledged this purpose.

3 **3. Conflicting government aims.** Three federal conservation initiatives are currently focused on the valley that conflict with this choice: (1) an America's Great Outdoors conservation initiative, (2) a Fish and Wildlife Service wildlife refuge/collaborative conservation initiative, and (3) a joint Natural Resources Conservation Service/U.S. fish and Wildlife Service Working Lands for Wildlife Habitat initiative.

4 **4. Lack of consideration of better alternatives.** The Southline Project currently being permitted accomplishes much the same objectives in southwestern New Mexico and southeastern Arizona. Building both is redundant and makes each less economically viable because of competition for power generation.

5 **5. Use by renewable generation is speculative.** While this project may facilitate development of some renewable energy sources, wind in particular, the extent of this is highly speculative, and the project is likely to spur expansion of non-renewable energy generation just as much. No companies have yet firmly committed to building renewable energy facilities in response to SunZia.

6 **6. Insufficient project partners.** Only the Salt River Project has a significant interest (13%) besides the Southwestern Power Group (MMR Group, 80%) in the project. Energy Capital Partners, which was to provide 40% of the capital to build the project, has withdrawn, and a replacement has not been found. The remaining partners appear to hold an insufficient interest to carry the project.

7 **7. Lack of financial viability and high financial risk.** The speculative nature of generation sources and the uncertain schedule of their construction place the project at great financial risk. The project does not appear capable of making a sufficient rate of return to recover costs and make a profit. This also makes it unlikely that SunZia could repay federal loan guarantees tentatively reserved for the project under the American Recovery and Reinvestment Act of 2009.

8 **8. Lack of a market for the power.** California has warned against building such lines because the state is projected to meet its Renewable Energy Portfolio requirements with its own resources. Arizona is projected to meet its own Renewable Portfolio Standards with in-state solar resources. The fundamental purpose of this project is to sell New Mexico power to these states to meet their RPS's.

9 **9. Lack of sufficient transmission capacity to deliver power to California.** Terminating SunZia at Eloy requires that California utilities and New Mexico power providers take away Arizona transmission capacity that was built by Arizona ratepayers both to deliver power within the state and to develop Arizona's solar resources. This would sharply reduce Arizona's ability to access its highest-quality solar energy reserves.

10 **10. Unquestioned endorsement of the project by Obama administration officials.** Obama's high-level energy policy advisers have seized upon this project as a way to fulfill the administration's renewable energy agenda without carefully weighing the project's true impact, stated purpose, and likely outcome. In doing so, they have overridden lower-level officials and strong public sentiment against a San Pedro route.

Anne Westenhaver
Benson, Arizona

1535	Response to Comment
1	Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance. Approximately 296 miles (56%) of the BLM Preferred Alternative would be parallel to existing or designated utility corridors, as stated in Section ES.3.4 and shown on Figure M10-4 Utilities of the DEIS. Future proposals for new utilities would subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
2	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation. The Applicant's objectives as stated in Section 1.4 of the DEIS include "to increase available transmission capacity in an electrical grid that is currently insufficient to support the development, access, and transport of additional energy-generating resources including renewable energy, in New Mexico and Arizona."
3	Comment noted.
4	Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the Purpose & Need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.
5	Comment noted.
6	The Applicant, SunZia Transmission, LLC, has submitted an application for right-of-way, which included the appropriate financial disclosures.
7	Federal loan guarantees have not been reserved for the Project.
8	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.
9	Capacity on existing transmission is owned and allocated by Arizona utilities (ratepayers) for the benefit of Arizona utilities. Although FERC allows open access, there is no requirement that Arizona utilities release reserved capacity to other power providers.
10	Comment noted.

1537

From: Guy McElvain
To: BLM_NM_SunZia_Project
Cc: danny67801@yahoo.com; cecilliam@ingalt.org; tripos@sdc.org
Subject: Proposed Sunzia route in Socorro County
Date: Thursday, August 02, 2012 9:56:46 AM

To Whom It may Concern,

My name is Guy McElvain and I am a resident of Socorro County living on a horse farm located in the Rio Grande Valley near Polvadera. To me the Rio Grande Valley is the treasure of New Mexico and very important agriculturally and environmentally to New Mexico. In a state with very little irrigable lands and very limited water resource it may well be one of the most important areas for New Mexico now and especially in the future.

1 For this reason I am absolutely astonished that you would propose placing this power line right through the middle of such an important area as well as the most densely populated area of Socorro County when you could go on the north border of the WSMR and then on the west border and cross the Rio Grande south of the Bosque Del Apache in an area that is not under cultivation and has no residents with much less impact. What are you thinking? I suppose the powers that be in WSMR have convinced you that somehow that would impact national security? Be reasonable, somehow you have managed to pick the most populated and important part of Socorro County to

2 run the power line through and it is ridicules given the alternatives. What about the hundreds of thousands of bird life using the fly way between the Bosque Del Apache and Bernardo? What about the thousands of tourists that come every year to Socorro County to visit that phenomenon? What

3 about the property values of the land you are proposing to cross versus the alternatives? Socorro County is a very poor county and does not have much to utilize in order to benefit itself, but in my perspective; the agriculture, the environment including the wildlife habitat, the community, and the history of this area of Socorro County will be seriously damaged by either one of these routes and it seems preposterous considering the alternatives.

I can tell you that I looked at this map for 5 minutes and can pick a better route so something else is at play here and it is my suspicion it has something to do with the WSMR. I have explored by horseback, bike and hike miles and miles of the shared use area on the north side of the WSMR for the last 25 years and I have NEVER seen any personal of the WSMR utilizing that land.

I have seen the survey stakes for this project over the years but have been unaware of what was happening but have now been informed by my neighbors about this project. I do and will formally object to both of your proposed routes through Socorro County and will pursue all avenues available to me to object and fight this proposal. I am angry that given the alternatives you propose to subject the people of Socorro County to this project and have apparently chosen the concerns of a government agency over the people.

Sincerely,
Guy McElvain

1537	Response to Comment
1	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. The alternative routes located adjacent to WSMRS north and west boundary and cross the Rio Grande south of the Bosque (subroutes 1C1, 1C2 and 1C3) were eliminated because they were not feasible. These routes would cross either wilderness study areas or military lands that are excluded for new rights-of-way.
2	Appendix B-2 of the DEIS discusses the collision risk to migratory birds in the Rio Grande Valley. An Avian Protection Plan will be developed to select and identify placement of mitigation measures to minimize the risk of collision.
3	As indicated in Section 4.13.4.5 of the DEIS studies have been reviewed regarding the effects of HVTLs on property values. The economic role of public lands is acknowledged in the DEIS, As stated in Section 4.13.4.5 “impacts (direct and indirect) to recreation and tourism have been identified by the public during the scoping process. The description of land use impacts to recreation areas or trails resulting from Project construction or operation have been described in Section 4.10.5 and visual impacts to recreation users have been described in Section 4.9.3. The Project would not substantially change the use of recreation areas or trails, and the number or type of recreation users would not be likely to change, therefore economic effects to recreation are not anticipated. Changes in the tourist economy would therefore not be expected.” Cumulative impacts to economic resources including recreational activities associated with ecotourism have been identified in Section 4.17.4.13 of the DEIS. As stated cumulative impacts on recreational resources could occur as a result of utility scale solar and wind developments, which could in turn affect ecotourism. It is likely that ecotourism will continue to be a positive trend although the level of impact cannot be quantified without speculative assumptions regarding future levels of recreation and tourism within the analysis area.

1539

From: Corliss Jenkins-Sherry
To: BLM_NM_SunZia_Project
Subject: comments regarding transmission line placement
Date: Friday, July 27, 2012 11:55:26 AM

BLM,

1 I have studied that maps that accompany the proposed SunZia Transmission line project and I see that the proposed lines
would impact the San Pedro Valley. This area is host to large numbers of birds in transit and could impact their survival.

Why can't the proposed lines follow the I 10 corridor?

Respectfully submitted by:
Corliss Jenkins-Sherry
8024 W Greensleeves Way
Tucson, AZ 85743

1539	Response to Comment
1	An Avian Protection Plan will be developed to select and identify placement of mitigation measures to minimize the risk of collision.

1545

From: Chet Hedden
To: BLM_NM_SunZia_Project
Subject: Questions/Comments to be Addressed in the Final EIS/RMPA
Date: Thursday, July 19, 2012 5:14:25 PM

1 Question: Title V of the Federal Land Policy Management Act of 1976 only grants the Bureau of Land Management the right to approve or deny requests for rightaway by outside developers; it does not authorize the Bureau to initiate or manage proposals for development. Therefore, why is the Bureau of Land Management, rather than SunZia, leading the proposal for the SunZia Southwest Transmission Project?

2 Question: Instead of building two new transmission lines that require new rightaways and new and undesirable impacts on the land, viewsheds, wildlife, and quality of human life, why does the SunZia company not instead modernize and expand existing transmission lines? This would minimize cost and eliminate impacts on the currently undeveloped areas under consideration and those areas' associated archaeological sites, visual resources, and critical wildlife habitats.

3 Comment: Tucson does not need or want electricity from New Mexico. A better long-term plan would be served by building a solar-generating plant close to Tucson.

4 Comment: The scale and proposed routing of this entire project is unacceptable. Building these new transmission lines would severely degrade fragile and scenic landscapes and viewsheds and archaeological sites, birds, fish, bighorn sheep, pronghorn antelope, desert tortoise, and shovel-nose snake as described in the EIS/RMPA. Those impacts are unacceptable.

5 5. This entire project is unnecessary and should not be approved. Instead, the BLM should adopt the "no action" option for this project.

Chet Hedden, Ph.D.
1-520-296-6477
1314 North Bedford Place
Tucson, AZ 85715

1545	Response to Comment
1	As stated in Section 1.3 of the DEIS, "The BLM's Purpose & Need for the proposed Project is established by regulatory obligations and directives, and current energy development trends. The Purpose & Need is used to formulate a reasonable range of alternatives to be considered in the EIS. The need for the BLM's proposed action arises from the FLPMA, which establishes a multiple use mandate for management of federal lands, including energy generation and transmission facilities as outlined in Title V of the FLPMA. The BLM's action in considering the Applicant's right-of-way application is provided under the authority to the Secretary of the Interior (BLM) to "grant, issue, or renew rights-of-way…for generation, transmission, and distribution of electric energy" (43 Code of Federal Regulations [CFR] 2800). Pursuant to 43 CFR 2801.2, it is the BLM's objective to grant rights-of-way and to control their use on public lands in a manner that: (a) protects the natural resources associated with public lands and adjacent lands, whether private or administered by a government entity; (b) prevents unnecessary or undue degradation to public lands; (c) promotes the use of rights-of-way in common, considering engineering and technological compatibility, national security, and land use plans; and (d) coordinates, to the fullest extent possible, all BLM actions under the regulations in this part with state and local governments, interested individuals, and appropriate quasi-public entities."
2	Upgrading existing transmission systems was considered as an alternative to new transmission, and described in Section 2.3.3.3 of the DEIS. For reasons stated in this discussion this alternative was considered but eliminated.
3	Comment noted.
4	Comment noted.
5	Comment noted.

1553

From: austinanne@powerc.net
To: BLM_NM_SunZia_Project
Subject: Public comment on DEIR for Sun Zia project
Date: Sunday, July 15, 2012 12:40:25 PM

1 I encourage the BLM to recommend the "no action" alternative to the proposed Sun Zia transmsission line. My request is based on the following reasons:

2 1. There is no demonstrated need for additional power transmission from New Mexico to Eastern Arizona or California. The "renewable energy sources" in New Mexico have yet to be built. Renewable energy sources in California are already under construction.

3 2. The environmental impacts of the proposed transmission project would be severe and could not be mitigated. These include effects on wildlife, and among people living along the construction areas or along access roads to remote construction areas.

4 3. The people who would be adversely affected by this project would receive no benefit from it. There is no demonstrated "public good." The only positive effect would be potential financial profit for the backers of Sun Zia.

5 4. It is not role of the BLM (or any branch of Government) to transfer wealth from rural American citizens to energy companies. This is the only predictable (if unintended) outcome of any determination other than the "no action" alternative.

1553	Response to Comment
1	Comment noted.
2	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, “2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions” (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.
3	Mitigation measures provided would be effective in avoiding or reducing potentially significant impacts, as described in Section 2.4.1.2 of the DEIS.
4	Economic benefits such as tax revenues generated by construction and operation of the Project are described in Section 4.13 of the DEIS.
5	Comment noted.

1564

From: Joseph Glade
To: BLM_NM_SunZia_Project
Subject: NM SunZia Project
Date: Wednesday, June 13, 2012 8:51:42 AM
Importance: High

Dear Sun Zia representative;

My name is Joe Glade; my wife, Carole and I own 20 acres of land in Deer Canyon Preserve ("Deer Canyon"), located approximately 3 miles south of Mountainair, NM. Deer Canyon is an 18,000-acre nature preserve that includes nearly 300, 20-acre lots. Deer Canyon is a conservation community with all utilities underground; including electric, water and phone lines. The views from all of the lots are breath-taking, with unencumbered 360-degree views. No utility poles, no power lines, no storage tanks.....only the vast open-space of some of New Mexico's most beautiful land. The planners of Deer Canyon did a wonderful job in placing each building envelope in such a way as to prevent views of one building envelope from being seen by others on adjacent building envelopes. Protective covenants are in-place to protect Deer Canyon and keep it in its current condition forever, including the views. This is what attracted us and many other current owners to New Mexico from various parts of the United States; we'll be relocating from New Jersey.

1 I recently reviewed a copy of the SunZia Southwest Transmission Project Newsletter #4. The document includes mapped routes of several alternatives; nearly all of which appear to negatively impact the views from Deer Canyon. Seeing electric transmission lines in plain view from many of the lots in Deer Canyon would significantly and adversely affect the views from these lots as well as seriously damage our property values. We weren't able to control the affects of the recent economic downturn on our property values but we do have control over human expansion.

2 While I'm not against conscientious development that benefits a large number of people, considerations must be taken to protect that which is truly unique and which seriously affects many people's homes and investments. We oppose and protest further consideration of this project, with its current alternative routing. Our opposition is specifically in the routing from Socorro to the SunZia East Substation. This routing could be changed so that it still runs to the proposed SunZia East Substation but proceeds East from Truth or Consequences, NM to approximately NM State Highway 54, then turns North into the East Substation. This route would traverse the White Sands Missile Range, thereby avoiding any negative impact on residential areas. Please advise how such an alternative route could be incorporated into this project

Best Regards,
Joe Glade
973-822-3895 (home)
973-714-6388 (mobile)

1564	Response to Comment
1	Impacts to property values are described in Section 4.13 of the DEIS, and impacts to views from residences are described in Section 4.9 of the DEIS. The Deer Canyon area appears to be outside of the northern study corridors for the SunZia Project.
2	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. The alternative routes located adjacent to WSMRS north and west boundary and cross the Rio Grande south of the Bosque (subroutes 1C1, 1C2 and 1C3) were eliminated because they were not feasible. These routes would cross either wilderness study areas or military lands that are excluded for new rights-of-way.

1565

From: Gary Scheidt
To: BLM_NM_SunZia_Project
Cc: lorenescheidt12@gmail.com
Subject: Public Comment in Oppostion of SunZia Southwest Transmission Project
Date: Saturday, June 09, 2012 9:20:54 AM

To: NM SunZia Southwest Transmission Project Representative

From: Gary Scheidt

Dear SunZia representative;
My name is Gary Scheidt. My wife and I own 20 acres of land in Deer Canyon Preserve ("Deer Canyon") and are planning to begin construction of our "dream home" next month. Deer Canyon is located approximately 3 miles south of Mountainair, NM. Deer Canyon is an 18,000-acre nature preserve that includes nearly 300, 20-acre lots. Deer Canyon is a conservation community with all utilities underground; including electric, water and phone lines. The views from all of the lots are breath-taking, with unencumbered 360-degree views. No utility poles, no power lines, no storage tanks…..only the vast open-space of some of New Mexico's most beautiful land. The planners of Deer Canyon did a wonderful job in placing each building envelope in such a way as to prevent views of one building envelope from being seen by others on adjacent building envelopes. Protective covenants are in-place to protect Deer Canyon and keep it in its current condition forever, including the views.

1 I recently received a copy of the SunZia Southwest Transmission Project Newsletter #4. The document includes mapped routes of several alternatives; nearly all of which appear to negatively impact the views from Deer Canyon. Seeing electric transmission lines in plain view from many of the lots in Deer Canyon would significantly and adversely affect the views from these lots as well as seriously damage our property values. We weren't able to control the affects of the recent economic downturn on our property values but we do have control over human expansion.

While I'm not against conscientious development that benefits a large number of people, considerations must be taken to protect that which is truly unique and which seriously affects many people's homes and investments. I oppose and protest further consideration of this project, with its current alternative routing. My opposition is specifically in the routing from Socorro to the SunZia East Substation. This routing could be changed so that it still runs to the proposed SunZia East Substation but proceeds East from Truth or Consequences, NM to approximately NM State Highway 54, then turns North into the East Substation. This route would traverse the White Sands Missile Range, thereby avoiding any negative impact on residential areas. Please advise how such an alternative route could be incorporated into this project. 2

Please continue to send me the SunZia Southwest Transmission Project Newsletters. My mailing address has changed. Please send future copies to:

Gary Scheidt
P.O. Box 876
Mountainair, NM 87036

Sincerely,

1565	Response to Comment
1	Impacts to property values are described in Section 4.13 of the DEIS, and impacts to views from residences are described in Section 4.9 of the DEIS. The Deer Canyon area appears to be outside of the northern study corridors for the SunZia Project.
2	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. The alternative routes located adjacent to WSMRs north and west boundary and cross the Rio Grande south of the Bosque (subroutes 1C1, 1C2 and 1C3) were eliminated because they were not feasible. These routes would cross either wilderness study areas or military lands that are excluded for new rights-of-way.

1571

From: Barbara Sparks
To: BLM_NM_SunZia_Project
Subject: Short Questions
Date: Monday, June 04, 2012 5:44:49 PM

Hi,
I called and left a message last week for Adrian Garcia.
My questions are simple.
Regarding the Sunzia Southwest Transmission Lines.

1 Will there be one or two lines going through Arizona?

2 How much area will have to be taken on each side of these lines/towers?

3 Living in an area that is supposed to be impacted - wondering when we would be notified that it's time to do something about our place of residence, if this ends up being the case?

Would appreciate an answer, not to be sounding curt - just so much false info floating around...it's upsetting.

Thank You,
Mrs. Barb Sparks
bbsparks@dishmail.net

1571	Response to Comment
1	As stated in Section 2.4 of the DEIS, the Project would consist of the construction and operation of two 500 kV transmission lines in New Mexico and Arizona.
2	The typical right-of-way would be 400 feet wide, which would include two transmission lines; each centerline located approximately 100 feet within the right-of-way boundary.
3	Private land owners will receive notification by the owner's representative to initiate surveys and right-of-way negotiations after the Record of Decision is issued.

1578	Response to Comment
	See following page(s)

1578

Karen Anderson

From: Don Kelly
Sent: Monday, August 27, 2012 11:25 AM
To: Barbara Shurtliff
Cc: Karen Anderson
Subject: FW: Comment on SunZia Project

FYI Comment For SunZia.

From: Garcia, Adrian A [mailto:agarcia@blm.gov]
Sent: Friday, August 24, 2012 12:20 PM
To: Don Kelly
Subject: FW: Comment on SunZia Project

Adrian Garcia
Project Manager/Realty Specialist
Bureau of Land Management
New Mexico State Office
(505) 954-2199

From: Arreola, Eduardo J
Sent: Thursday, August 23, 2012 10:09 AM
To: Garcia, Adrian A; Warren, Melissa D
Subject: FW: Comment on SunZia Project

FYI

From: BLM_AZ_ASOWEB
Sent: Thursday, August 23, 2012 9:06 AM
To: Arreola, Eduardo J
Cc: BLM_AZ_LLAZ912000
Subject: FW: Comment on SunZia Project

Hi Eddie . . .I'm not sure who is capturing "remarks" on the SunZia project. It appears to be New Mexico. Don't know why we got it unless the "transmission lines" are coming through Arizona. Could you help by assuring that the right person gets these ? Thanks Eddie . . . . . Bob K.

From: Jacquie Dale [mailto:jacquie.dale@gmail.com]
Sent: Monday, August 20, 2012 3:30 PM
To: BLM_NM_SunZia_Project
Cc: feedback
Subject: Comment on SunZia Project

Jacqueline Dale

160 Keonekai Rd, #2-201

1

1578

Kihei, HI 96753

jacquie.dale@gmail.com

August 20, 2012

Dear Mr. Garcia,

Below are my comments on the SunZia Transmission Line draft EIS. I appreciate the opportunity to have my comments considered for this proposed project.

I am opposed to any of the routes identified in the EIS. I advocate a NO ACTION OPTION be taken on building the transmission line for the following reasons:

1 The renewable energy aspect of the transmission line is speculative. Is this a case of "if we build it, they will come" because it appears that there are only non-renewable energy sources along the path of the transmission line signed up thus far? I am concerned that this is really just about building a transmission line to move power from a gas fired power plant which has been proposed but not yet built in Bowie. My understanding is that one of the partners of the SunZia transmission line is the developer of that Bowie power plant. I suspect that the public has been given misinformation on the true nature of this transmission line – it is really not about renewable energy at all and there is no guarantee that it ever will be.

2 Research by the Cascabel Working Group uncovered the fact that California does not need this power because it will meet the renewable resources requirement with its own resources. Taking power from New Mexico and transmitting it across rural Arizona makes no sense when there are already renewable energy projects that are not running at full capacity in other locations in Arizona, such as Gila Bend. Why would you build something to transmit energy that is not needed? The issue of redundancy cannot be over-stated. The Southline Project currently being permitted accomplishes much the same objectives in southwestern New Mexico and southeastern Arizona with far less impact.

3 Transmission Lines in remote areas are more vulnerable to sabotage, terrorist attacks, and natural disasters, and fire than are lines that are located in corridors such as along highways. I have lived in the Lower San Pedro River Valley and know that it is very remote with limited access in and out of the valley. The residents and plants and animals are at a high degree of risk from fire and other natural disasters. Transmission lines and arcing from lightning strikes, for example, can cause a situation that would put the residents of this valley at

2

1578	Response to Comment
1	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity. The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation.
2	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS. Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the Purpose & Need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.
3	Comment noted.

1578

risk. I don't feel this issue was adequately examined in the EIS. A related issue is one of the cost to Arizona taxpayers who would be footing the bill to fight a fire on what is primarily State land in order to protect transmission lines.

4 The issue of cultural and environmental sensitivity of the area was insufficiently addressed in the draft EIS. SunZia will create an entirely new corridor down the San Pedro River Valley with an accompanying road for a minimum of 30 miles. This corridor will become the principal transmission corridor in the Southwest and will likely be expanded in the future, further increasing impact. It may be possible to mitigate any direct impact to cultural sites at the time of the building of the transmission line but indirect effects, which can occur at a later time are very hard to mitigate for. This is also true for ecological impacts. These impacts can never be undone. The San Pedro River Valley is truly a special place and there are very few places left in the southwest (if any) that have such a long and continuous record of human occupation. The plants and animals, including many
5 protected species, are highly vulnerable and susceptible to changes in the environment in which they live. A transmission line would have a major effect on their environment and the building of a transmission line would disrupt entire ecosystems, fragmenting them. It makes much more sense to build a transmission line along corridors that already exist rather than create a line through new areas.

6 The preferred alternative and alternative routes were selected over the strong objections of valley residents, ranchers, conservationists, and political representatives. Many individuals and organizations in the valley and outside of it have put a great deal of time and energy into conservation projects that will be in jeopardy. Many valley residents have been very active in conservation projects and supportive of conservation easements in the vicinity of the proposed routes. This seems contradictory to many of the projects that have been done and are currently being considered by the US Fish and Wildlife, USFS, and BLM in the area. Additionally, the draft EIS has not taken into consideration the concerns of the local Natural Resource Conservation Districts (Redington and Winkelman) despite having legal coordinating status on the project.

For the reasons stated, I strongly encourage the BLM to not build the SunZia transmission line and choose a NO ACTION OPTION.

Sincerely,

Jacqueline Dale
Kihei, HI

Cc: Secretary Ken Salazar

3

1578	Response to Comment
4	Comment noted.
5	Comment noted.
6	Comment noted.

1583

BLM
SunZiaSW Transmission Project
PO Box 27115
Santa Fe NM 87508

From: John R. Sais
HC 66 Box 604
Mountainair, N.M.
87036

ATTN Adrian Garcia

The following are my comments of the SunZia SW Transmission project. The comments and concerns are not conclusive:
My family and I are opposed to the Transmission Line that goes through our property (T1NR4E).The proposed Transmission lines go through our family ranch. Our place is our home, ranching business and heritage. This route was designated E80, E100 and E 90 in the Study Area Expansion on April 2010. I do not know what the # designation is for Yr. 2012. But, the area that it goes through is on T1NR4E. It proposes to go just south of my home.

We, the Sais Family, are of Hispanic or Spanish background and have inalienable rights that are protected by the laws of our federal and state to protect the customs, culture, and livelihood of our heritage. This Transmission line will put in danger this historical heritage that is rooted in the Sais Ranch. There has been five generations on this ranch and our historical roots have been traced back 600 years.(see comments of June 17, 2010). My grandfather lived on the ranch when NM was still a Territory. He is acknowledged in the history book written by
Ralph
e. Twitchell--" The Leading Facts of New Mexico history Vol, III" Mr Twitchell was vice-President of the Historical Society of New Mexico. The book states the vastness and significance Victor Sais had in NM in his time.

1 MY RIGHTS UNDER TITLE VI OF THE ENVIRONMENTAL JUSTICE UNDER THE CIVIL RIGHTS ACT will be violated if approval is given to SunZia for installation and right of ways of the Transmission Lines through our property.
1: How can the Transmission Lines be justified without violating my rights specifically under Title VI Environmental Justice under the Civil Rights Act?

2 The NATURAL HERITAGE CONSERVATION ACT, SIGNED BY Gov Richardson's administration was praised as an important step and supported by both the State and BIM towards the protection of "working farms, ranches and other agricultural lands"
2: The installation of the Transmission Lines are just the opposite of what this Act was intended and is in conflict with it's intent. How can you justify the Line in accordance with the intent of the Act?

3 THE SOCORRO COUNTY BOARD OF COMMISSIONERS APPROVED, ADOPTED AND PASSED on June 22, 2010 RESOLUTION N0. 2010-45,: (See Attachment # 1) They unanimously stated that they support SunZia crossing the Rio Grande only in the vicinity of Arrey, NM and the alternative rt of eastern and southern boundary of White Sands Missile Range.;
3) How can you completely ignore the Socorro County Board of Commissioners on your proposed route through my place and crossing the Rio Grande on a designated place contrary to the Resolution of Socorro.?
You are flagrantly usurping the legal authority of Socorro County. Why have you not addressed this issue on the restrictions set forth for crossing the Rio Grand River?

4 4) I submitted my comments as instructed June 17, 2010: They were not addressed. By law every one of my questions and concerns has to be addressed. Why haven't you done so?

I respectfully submit these comment and concerns,
John R. Sais and Ramona Sais Phone 575-423-3218
HC 66 Box 604
Mountainair NM 87036

August - 22 - 2012
John Sais
Ramona Sais

08/22/2012 15:45 5754233218 SAIS PAGE 03

1583	Response to Comment
1	In response to EO 12898 and Title VI of the Civil Rights Act, an analysis was conducted to identify and address high and disproportionate impacts to environmental justice populations (see sections 3.14 and 4.14 of the DEIS). The result of the analysis indicates that no significant impacts to environmental justice populations are expected to result from the construction and operation of the BLM Preferred Alternative.
2	Comment noted.
3	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. The alternative routes located adjacent to WSMR's north and west boundary and cross the Rio Grande south of the Bosque (subroutes 1C1, 1C2 and 1C3) were eliminated because they were not feasible. These routes would cross either wilderness study areas or military lands that are excluded for new rights-of-way.
4	Please refer to Table 1-3 Summary of Issues from Scoping in Section 1.5 of the DEIS, which lists issues that were identified during the scoping process, and indicates where the issues were addressed in the DEIS.

1583

Attachment #1

NOW, THEREFORE, BE IT RESOLVED, that Board of County Commissioners only supports:

- SunZia's alternative routes that traverse the Rio Grande River in the vicinity of Arrey, New Mexico, and travels northerly and parallel to the western boundary of the White Sands Missile Range;
- SunZia's alternative routes that travels from the Deming, New Mexico site to the Southern border of White Sands Missile Range then northerly and parallel to the eastern boundary of the White Sands Missile Range;

BE IT FURTHER RESOLVED that the Board of County Commissioners believes that such a routing for SunZia's transmission lines will result in less impact on the area's economic, environmental and wildlife resources than would otherwise result from use by SunZia of the ~~proposed~~ new route across the Rio Grande River ~~at a point just north of US 380 and San Antonio, New Mexico~~;

BE IT FURTHER RESOLVED that the Board of County Commissioners opposes all alternate routes along I-25 corridor and the Rio Grande River valley without the presence of a feasibility study for the installation of underground transmission lines;

NOW THEREFORE, BE IT RESOLVED, that the Board of County Commissioners, with these conditions as stated herein, endorses the construction and operation of the SunZia Southwest Transmission Project in Socorro County;

APPROVED, ADOPTED, AND PASSED on this 22nd day of June, 2010.

BOARD OF COUNTY COMMISSIONERS

ROSALIND F. TRIPP, CHAIR

DANIEL P. MONETTE, VICE-CHAIR

PHILLIP ANAYA

RUDOLFO J. GRIEGO

JUAN JOSÉ GUTIERREZ

ATTEST BY:

REBECCA (BECKY) VEGA, COUNTY CLERK

08/22/2012 15:45 5754233218 SAIS PAGE 04

1583	Response to Comment
	See following page(s)

1627

NMSunZiaProject@blm.gov

Anna Lands
6520 Cascabel Road
Benson AZ 85602
healing@rnsmte.com DEIS COMMENT August 22, 2012

Dear Mr. Garcia,

In Volume I, 3.15.2, pages 3-307 and 3-308 of the DEIS, the subject is Electro-Magnetic Fields. Without literally discounting the idea that electro-magnetic fields could be harmful to life, the subject is effectively discounted by the minimizing effect of the discussion.

The International Commission for Electro-Magnetic Safety issued a **Precautionary Principle** which states when there are indications of possible adverse effects, though they remain uncertain, the risks from doing nothing may be far greater than the risks of taking action to control these exposures. The Precautionary Principle shifts the burden of proof from those suspecting a risk to those who discount it." (www.icems.eu)

1 The discussion of electro-magnetic effects as covered by the DEIS is seriously inadequate - the EIS must contain a complete report. The subject is worthy of a place in the index.

Sincerely,

Anna Lands

1627	Response to Comment
1	A summary of the results of a Preliminary EMF and Corona Effects Study (Schaerer et al. 2011) were provided in Section 4.15.3.2 of the DEIS. The study report is appended to the FEIS Appendix K.

1663

Response to the Draft EIS
SunZia Southwest Transmission Project

1 I have considered the Draft EIS for the Proposed SunZia Southwest Transmission Project and must recommend a denial of the permit, a No Action decision.

This response is informed both by the Draft EIS itself and by my own years as a Conservation Commissioner in my town, considering applications for local landscape-altering projects. Of course these were much smaller in scale than the SunZia proposal, but the responsibilities and even the language are familiar. Local Conservation Commissions must:

1. Determine whether or not the proposed changes to the landscape are "significant."
2. Recommend mitigating measures.
3. Allow significant changes if the applicant can provide "replication."

Conservation Commissioners are responsible to the State Wetlands Protection Act. Over the years I came to understand we were to find ways to allow projects to proceed, to guide applicants into compliance in these ways:

1. Through rewording the application, to enable a determination of "insignificance."
2. Through setting up temporary erosion barriers for "mitigation."
3. Through finding some other piece of ground and turning it into a new wetland by digging and installing listed wetlands indicator species (plants) and establishing a source of water for these plants.

This system for allowing the altering of wetlands is legal, and it is wrong.

2 Though the BLM has spent significant time and resources studying the environmental impacts of the Preferred Alternate Route for the SunZia Transmission Project and has determined insignificance by finding that certain kinds of impacts will be minimal, or "minimized," I must disagree and ask that the permit for the project be denied through a No Action decision.

In my town, in my country, and in our modern middle-American culture, we take for granted certain levels of consumption, which require high use of energy and much alteration of landscape. The resulting pollution and degradation of air, land, and water endanger us all. To think we can carve roadways and run high voltage lines, with their supporting structures and footprints, especially along subroute 4C2c, is a mistake. The Lower San Pedro area is treasured by residents, visitors, biologists, and wilderness hikers, not to mention the great number and variety of other living things native here. Also, many species depend upon this area for a migration corridor.

To endanger all this, to permit changes to this landscape that supports so many of us in ways not touched upon by any Conservation Commission or Draft EIS, is wrong.

As responsible land citizens, we must all take a step back from the habits, assumptions, and levels of consumption we take for granted. These have set the

1663	Response to Comment
1	Comment noted.
2	The results of the environmental impact analysis are documented in Chapter 4 of the DEIS. Significant impacts (or high impacts) have been identified and described for each of the affected resources, defined as follows "impacts that could cause substantial change or stress to an environmental resource or use (severe adverse or exceptional beneficial effects)" (pg. 4-2 of the DEIS).

1663

American west on fire, drowned other areas, and driven many populations to poor and desperate circumstances.

Ours is a land of abundance. As "commissioners" in our lives, we all have a responsibility to look up from business as usual and say, "I can see a better way."

This means no more transmission towers across New Mexico or Arizona. It means support and development of clean power sources locally, town by town and house by house. We have the opportunity now to respond to out energy needs with the thrill of learning new ways which are locally sustainable and not destructive to the living landscape.

3 We can recognize that the value to all of this subroute 4C2c is not as a pathway for long distance transmission of electricity. Its true value, which cannot be replicated, is inherent in its present unaltered state. We must protect it from ourselves as we change our habits of energy consumption.

Sincerely,

Bonner J. McAllester

1663	Response to Comment
3	Comment noted.

1665

From: Sierra Club on behalf of Bonnie Poulos
To: BLM_NM_SunZia_Project
Subject: Please oppose the SunZia Southwest Transmission Project
Date: Monday, August 20, 2012 11:11:22 PM

Aug 21, 2012

Mr. Adrian Garcia
PO Box 27115
Santa Fe, NM 87502-0115

Dear Mr. Garcia,

1 I have hiked in Aravaipa Canyon for the last 4 decades. The plan being proposed will destroy an incredible wilderness area that is deserving of more protection. This power line is not needed, there is no justification for even considering its construction. Stop this ridiculous nonsense and recommend No Action on this stupid, pro-development, land grab plan.

I am writing to urge the Bureau of Land Management (BLM) to adopt the No Action alternative for the proposed SunZia Transmission Line Project Draft Environmental Impact Statement (DEIS), which would not permit this project to be built on our public lands.

Although I support renewable energy and recognize the need to utilize some of our public lands for development and transmission of these resources, projects such as the SunZia Transmission Line would irreversibly damage unique and important ecosystems and should not be permitted. I strongly object to the proposed routes, including the preferred alternative, that threaten critical natural areas and cut through unfragmented lands, especially the routes traversing the Lower San Pedro Valley, the Aravaipa Canyon Watershed, and the Avra Valley.

The BLM, as the agency responsible for much of the public land in the West, should recognize the importance of these lands and should strive to protect the vital environmental values and resources found within them. Our transition to clean energy must not be at the expense of pristine wild lands, important wildlife habitat, or the quality of our water resources.

I question both the purpose and need for the SunZia project. The DEIS does not support the assertion that constructing the SunZia line will "encourage the development of additional renewable energy." There is no guarantee that this line would be used primarily for renewable energy, nor that those renewable energy sources would even be available. Similarly, even though the purported purpose is to transmit power from New Mexico to California, California has not stated that it is willing to purchase this energy, nor does it have the infrastructure in place to accept it.

Please select the No Action alternative. Our public lands, wildlife, air and water quality, and the many other resources that would be negatively affected by this project are too important to risk. There are much better ways and alternatives to truly promote renewable energy resources.

1665	Response to Comment
1	As stated in Section 3.12.4.1 of the DEIS Subroute 4A/4B would be approximately 3.75 miles south of the Aravaipa Canyon Wilderness Area. The BLM Preferred Route (Subroute 4C2c) would be approximately 15 miles southwest of the Aravaipa Canyon Wilderness Area.

1665

Thank you for considering my comments.

Sincerely,

Ms. Bonnie Poulos
1208 E Smoot Dr
Tucson, AZ 85719-1351

1665	Response to Comment
	See following page(s).

1679

August 22, 2012

Adrian Garcia, Project Manager
Bureau of Land Management – New Mexico Office
NMSunZiaProject@blm.gov
DELIVERED VIA EMAIL

Re: SunZia Southwest Transmission Draft EIS – SunZia substation to Pinal Central Substation 500 KV transmission line project

To whom it may concern:

We own approximately 1,100 acres at the intersection of Earley & La Palma Roads in Pinal County Arizona (see Exhibit A). Over the last few years, we have worked diligently with the City of Eloy and have expended significant time and resources in planning and obtaining development entitlements for this property, including expending resources on general plan amendments, development agreements and water and sewer master-planning.

1 In July of 2012, the Arizona Corporation Commission approved Tucson Electric Power's (TEP) Pinal Central to Tortolita power line project. The approved alignment bi-sects our property approximately ½ mile south of Laughlin Road (see Exhibit A). In reviewing the Draft Environmental Impact Statement for the SunZia project, we noticed that your proposed alignment is directly in line with the TEP power line. We have some serious concern as to the impact to our property having both of these power lines located on our property. We know that these power lines will have a tremendously negative impact on the developability, accessibility and marketability of the property. There is also concern that there will be remnant parcels that will not have access or contiguity with the remaining property.

2 We would like to request that the SunZia powerline be located to the north of Laughlin Road (see Exhibit A) so we are not further damaged by a power line project being located on our property.

3 We have participated in the various public open houses sponsored by TEP and SunZia and have shared our opinion with other participants and presenters at those meetings and intend to continue our participation in the process. We would like to continue to be included in all future project communication and also retain the option to be an intervening party during the Arizona Corporation Commission's public process.

1679	Response to Comment
1	Visual impacts to existing and planned residential viewers are described in Section 4.9.3.2 of the DEIS for this portion of the Project. Where right-of-way is required crossing private lands, the Applicant or owners' representative would negotiate the amount and terms of compensation with individual property owners, that would include market value compensation for residual impacts that may include remnant parcels.
2	The final location of the proposed 500 kV transmission lines may be adjusted to minimize impacts to properties.
3	Comment noted.

1679

We look forward to continuing our participation in your project. Please feel free to contact me at 480.222.5870 if you have any questions regarding this letter.

Sincerely,

Cameron MacDonald, PE
Cardon Hiatt Bowden
1223 S Clearview Ave, Ste 103
Mesa, Arizona 85209

1679	Response to Comment
	See following page(s)

1686

From: Carol S. Kestler
To: BLM_NM_SunZia_Project
Subject: SunZiaProject
Date: Sunday, August 19, 2012 6:42:49 PM

Attention: Adrian Garcia at NMSunZiaProject@blm.gov

Dear Mr. Garcia,

I appreciated meeting you and talking with you briefly at the public meeting in Tucson. Here is the follow-up email I promised at that time.

1 The SunZia Project impacts the last free-flowing river in the Desert Southwest, part of the largest unfragmented landscape in Arizona outside the Grand Canyon region. It is one of the three principal desert life corridors (along with Colorado and Rio Grande Rivers) exceeding the Rio Grande River Valley in biological richness, and hosting the largest mammal species diversity in North America. The San Pedro is habitat for numerous threatened and endangered species, and hosts one of the largest remaining intact mesquite forests in the world.

2 The area has been named one of the Nature Conservancy's "Last Great Places". It is the principal north-south migration corridor for Central American birds, recognized as a Globally Important Bird Area by the American Bird Conservancy. In addition, there is a rich archaeological history dating from earliest North American human occupation (Clovis).

3 SunZia will create an entirely new corridor down the San Pedro River Valley with an accompanying road for a minimum of 30 miles. This corridor will then become the principal transmission corridor in the Southwest and will likely be expanded in the future, further increasing impact. This route was selected over the strong objections of valley residents, ranchers, conservationists, and political representatives. Building and maintaining such a route through previously wild and undeveloped land will destroy the entire nature of the San Pedro Valley and all if its eco-tourism value.

4 Furthermore, lines in remote areas are more vulnerable to sabotage, terrorist attacks, and natural disasters than are lines that are located in corridors such as along highways. Effective security for transmission lines routed across vast, rugged and remote landscapes is essentially impossible, and lines damaged by natural disasters are more difficult to repair.

Three federal conservation initiatives are currently focused on the San Pedro valley that conflict with SunZia (1) an America's Great Outdoors conservation initiative, (2) a Fish and Wildlife Service wildlife refuge/collaborative conservation initiative, and (3) a joint Natural Resources Conservation Service/U.S. fish and Wildlife Service Working Lands for Wildlife Habitat initiative.

Obama administration high-level energy policy advisers have seized upon SunZia as a way to fulfill the administration's renewable energy agenda without carefully weighing the project's true impact, stated purpose, and likely outcome. In doing so, they have overridden lower-level officials and strong public sentiment against a San Pedro route.

The Southline Project currently being permitted accomplishes much the same objectives in southwestern New Mexico and southeastern Arizona with far less

1686	Response to Comment
1	Comment noted.
2	Comment noted.
3	Transmission lines associated with the Project would span river channels, and therefore would not affect the water flow. Impacts to flora, fauna and ecotourism, and associated mitigation measures are provided in Chapter 4 of the DEIS. Future proposals for new utilities and other development would be subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
4	Comment noted.

1686

5 impact. Building both Southline and SunZia is redundant and makes each less economically viable because of competition for power generation.

While SunZia may facilitate development of some renewable energy sources, wind in particular, the extent of this is highly speculative. No companies have yet firmly committed to building renewable energy facilities in response to the project.

The speculative nature of generation sources and the uncertain schedule of their construction place the project at great financial risk. The project does not appear capable of making a sufficient rate of return to recover costs and make a profit. This also makes it unlikely that SunZia could repay federal loan guarantees tentatively reserved for the project under the American Recovery and Reinvestment Act of 2009.

Only the Salt River Project has a significant interest (13%) besides the Southwestern Power Group (MMR Group, 80%) in the project. Energy Capital Partners, which was to provide 40% of the capital to build the project, has withdrawn, and a replacement has not been found. The remaining partners appear to hold an insufficient interest to carry the project.

California has warned against building such lines because the state is projected to meet its Renewable Energy Portfolio requirements with its own resources. Arizona is projected to meet its own Renewable Portfolio Standards with in-state solar resources. The fundamental purpose of this project is to sell New Mexico power to these states to meet their RPS's.

I trust that public feedback will receive serious consideration at this time. Thank you.
Sincerely,
Carol S. Kestler
1311 E Duke Dr.
Tucson, AZ 85719
520-323-0185

1686	Response to Comment
5	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.

1738

From: Dave and Nancy
To: BLM NM SunZia Project
Subject: Comments on DEIS
Date: Saturday, August 18, 2012 9:14:19 AM

Mr Garcia,

My comments relate to the proposed placement of SunZia power lines in the San Pedro River area of southern Arizona
identified in the draft EIS as "Route Group 4". I attended your presentation in San Manuel and appreciate your time and
attention in this matter.

This rural area currently has limited development, a highly desirable visual resource quality and a high cultural
and biologic resource quality as a minimally developed rural residential and agricultural area. Placement of
proposed power towers and lines will impose multiple negative impacts. These negative impacts as stated in the
proposed DEIS include:

1 1) Degradation of visual quality as stated as "high to moderate visual impact" in the EIS. Although there is
currently a natural gas line along portions of the proposed power line placement route, since the gas line is mostly
buried or at the surface it does not have the negative visual impact that will be created by the power structures.
Placement of towers in the San Pedro River Valley will degrade the visual quality of the area. Additionally, tower site
ground clearance, and the construction of maintaince/access roads and substations will also have negative "on the ground"
visual impact.

2 2) Auditory impact on rural residential quality of life from powerline noise, construction noise and ongoing noise
and congestion from vehicles and large equipment required to maintain the energy structures.

3 3) Decreased air quality from unspecified "permanent emmissions during project operations", road and construction
site dust and wind erosion and construction and maintaince vehicle emissions

4 4) Disruption of plant and animal ecosystems with removal of vegetation. The middle San Pedro River riparian
habitat is well recognised as a unique and important avian resource and a well utilized migration corridor. Any disruption
to the riparian environment along the river will degradate that resource. Additionally, disruption of soil and plants in the
surrounding desert will have negative impact on many endemic Sonoran desert animals as well as the permanent
disfiguration of the desert environment. It is well established that soil and ground impacts in the desert environment
are never fully or adequately mitigated by erosion control, plant salvage, revegetation or backfill attempts. It is also well
established that attempting to limit or control recreational vehicular use once established roads and right of way areas
have been created in the desert, which will lead to further degradation of the environment.

5 5) Because of the inherent minimal rainfall, the desert environment has evolved a very fragile hold on erosion due
to water runoff. The construction efforts for this power line and associated access roads will disrupt the

1738	Response to Comment
1	The visual resource impact of the structures, lines, work pads, and access roads associated with the preferred alternative was considered and assessed in the Visual Resource Inventory and Impact Assessment sections 3.9 and 4.9 of the DEIS. Section 4.9 of the DEIS describes that moderate-high to moderate impacts are anticipated along the preferred alternative where it crosses Class B scenery associated with the west side of the San Pedro River Valley, and further describes selective mitigation measures that may reduce impacts by reducing visual contrast. Visual impacts that result from construction of buried pipelines are caused by the scar remaining after burial where revegetation is not effective.
2	Comment noted.
3	No permanent emissions have been identified in the analysis documented in the DEIS.
4	Section 4.6.2 of the DEIS discusses potential impacts to biological resources.
5	As stated in Section 4.5.2.1 of the DEIS, selective mitigation measures SE 2 and SE 8 would be applied as appropriate to effectively minimize impacts related to erosion from the construction and operation of the Project. These measures would be included prior to Project construction in the final POD.

1738

5 natural
water flow and lead to increased ground erosion. Which will lead to further degradation of the environment and
more erosion in an endless cycle.

6 6) Siting the power lines along the existing gas line corridor will set a precedent for the likely designation and
further development of a state and/or federally mandated "energy corridor" in the area; such a designation could lead
to additional future development in an area that is highly prized for its low density, underdeveloped and minimally
disturbed quality by local residents.

Although I acknowledge and appreciate the need to improve the energy infrastructure of the western U.S., it seems
premature and unreasonable to ask communities that will receive little or no benefit from placement of power
structures and substations to accept the physical, cultural and environmental impacts of such industrial development when there is no definitive or established market for the power, and there is no clear-cut evidence that
the proposed power lines will be utilized to maximum potential in the short or long term.

As a resident of the area I cannot support the current proposal and would encourage the BLM not to give approval for
a project that will create multiple negative impacts with limited possibilities for mitigation and little assurance
of long term benefit.

7 I strongly encourage the BLM to consider an alternate route for the powerlines in an area of higher development and population
density that already has established utility corridors.

Dave Wilhelm
16375 N San Pedro River Rd.
Redington, AZ 85602-8409

1738	Response to Comment
6	Comment noted.
7	Comment noted.

1802

From: Elna Otter
To: BLM_NM_SunZia_Project
Subject: Comments on the SunZia DEIS
Date: Tuesday, August 21, 2012 11:40:33 PM

Adrian Garcia,
BLM SunZia Project Manager,
P.O. Box 27115,
Santa Fe, NM, 87501

Dear Mr. Garcia:

1 I favor the No Action option for SunZia. Briefly, there is no reasonable need for this facility, and were such a facility built it would open the way for domestic terrorism.

Around the world people are increasingly using energy efficient appliances and heating. They are insulating their homes. At a recent Arizona Corporation Commission workshop on electric utilities (7th Biennial Transmission Assessment), it was noted that most providers were moving back their projects by at least a year. The Australian Radio station (ABC) with Mark Colvin recently aired a program (see http://www.abc.net.au/pm/content/2012/s3566840.htm) which started with the words, "A new report shows demand for new electricity generation in Australia is slowing down." Their figure was a delay on new facilities by about 4 years, attributable to greater efficiency and an increasing number of rooftop solar panels. The same is true in other parts of the first world, not even to mention Germany with its remarkably successful green energy program.

The Sierra Club and other environmental groups (to say nothing of the Home Depot) are sponsoring programs to make it easy for citizens to get rooftop solar panels at a reasonable price. Electric companies are sponsoring home efficiency audits, even if against their will. The net is that demand for electricity produced by distant facilities is down here in the Southwest too, and that trend is apt to continue.

If Secretary Salazar wanted to encourage the use of renewables and truly deemphasize fossil fuel production and the inevitable pollution it engenders, then these trends should continue to be encouraged. Transfer the funds that would otherwise support energy transmission to locally produced energy systems. If large wind or solar facilities are built, their output could replace fossil-fuel-produced energy.

We do not need to ask the question whether the renewable aspect to SunZia makes the sacrifice of the environment inherent in its construction worthwhile. No sacrifice of environmental values should be allowed because none is needed to move toward renewable, local energy.

2 While on the topic of SunZia actually encouraging the use of renewable energy, I note that the company has been singularly unsuccessful in convincing the public that such is actually the case. We note that people first heard of SunZia when the Southwest Power Company (which owns SunZia) wanted to get government funds by claiming that their plant in Bowie, Arizona was going to engage in carbon sequestration. Apparently they failed to note that to be appropriately sequestered the carbon was supposed to be taken out of circulation and that growing tomatoes with the exhaust from the plant didn't quite meet that requirement. Nonetheless, despite the failure to get the coal permit, they continue to have a natural gas permit, and I don't know of anyone who doubts that energy produced in the Bowie plant will be the first energy to be accommodated on new SunZia lines.

3 Big transmission lines inevitably lead to the possibility of terrorism. If one wanted to create mayhem, destroying the electical supply to one of the big cities (such as Phoenix) would certainly seem like a possible method. The U.S. Congress Office of Technology Assessment referenced such information in a report available online titled "Physical Vulnerability of Electric Systems to Natural Disasters and Sabotage." However, perhaps due to lobbying on the part of electric companies, that concern seems to have dissipated. Nonetheless, locating transmission lines in remote areas rather than along reasonably accessible routes would seem to encourage such an avenue for terrorism.

1802	Response to Comment
1	Comment noted.
2	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation.
3	Comment noted.

1802

4 Before I end my comments, I would like to point out that the Arizona Corporation Commission which I attended discussed several other items relevant to transmission line construction here. For example, it was pointed out that not only does California not want any outside energy, it doesn't have the transmission lines going to its borders to accept any. Does that not obviate the need for the Western half of SunZia. Furthermore, Arizona has a huge amount of renewable potential. Why are we considering facilitating Bowie Power plant's being part of our grid?

5 I would like to not spend money constructing power lines at all. That would surely be the easiest way to ensure that such lines were not being used in support of fossil-fuel-produced power. However, if it is really true that we need stability in the current system, then we should wait until Southline is ready to come on line. The cost will be significantly less, but it will include a lot of substations to facilitate multiple interconnections, which is presumably what would be high on the list of desirable features should one legitimately want to increase line stability.

Finally, it is a bit disconcerting when one discovers that Tom Wray and his team at SunZia are already signed up to discuss how to get one's transmission line proposal through the approval process before the DEIS comment period is even over. See for example *Transmission Siting: Planning, Permitting and Construction for Sensitive Environments*, August 22-23, 2012, in Portland Oregon where it the topic will be to "discuss routing, permitting, design and construction practices for transmission projects in environments with sensitive botanical, cultural, and wildlife resources" at
http://www.euci.com/events/?ci=1677&t=O?utm_medium=eNL&utm_campaign=THUB_DAILY&utm_term=Original-Member. [At least they know that their routing will be through sensitive areas!] They also plan to discuss this in October at the Transmission Summit WEST 2012
Accelerating Transmission Siting, Development and Investment in the West
with a talk entitled *Case Study 3: Rapid Response Teaming for Transmission (RRTT) Project Status and Update* (Tom Wray, Project Manager, SUNZIA SOUTHWEST TRANSMISSION PROJECT) at
http://www.infocastinc.com/downloads_pdf/transwest12_agenda.pdf. One wonders if they will discuss the ways in which an unpaid, volunteer group of individuals can be run over by highly paid professionals with extraordinary funding or whether the exercise is just hubris.

Thank you for considering my comments.

Elna L. Otter
5819 N. Cascabel Rd.
Benson, AZ 85602

520-212-9736

1802	Response to Comment
4	The Bowie Power Station is not part of the proposed action. Please also see response to Comment No.2.
5	The Southline Transmission Project is not considered an alternative to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way. As part of the purpose and need of the SunZia Project, the Midpoint, Lordsburg, and Willow-500kV substations would be potential interconnection points for future solar energy development projects that may be located within southwestern New Mexico and southeastern Arizona. It is noted there is an existing 345kV transmission line between the Afton SEZ and the Midpoint Substation, as shown on Figure 4-1 of the DEIS.

1812

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

Ernest Thompson
NAME
HC 66 BOX 613
ADDRESS
Mountainair NM 87036
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ☐ Yes ■ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:

1 (1) Within the BLM's proposed study area routes what is the latitude of movement of the transmission lines within the study area corridor? And what is the maximum number of transmission lines the corridor will allow in the future?

(2) Is there a plan in place for the clean up and restoration of the transmission routes, the energy generating sites and the infrastructure associated with this project, after the life cycle of this project is terminated, either by political or economical reasons? Who will be responsible for the restoration? And if it is the BLM and Federal Government how will the cost of this issue be resolved?

(3)To what capacity does the BLM and the Federal Government except responsibility for the future health and wellness of the natural plants and wildlife, domestic livestock and other animals and humans living within and adjacent to the high voltage transmission lines?

2 (4) By BLM and the Federal Government granting these easements and Energy Tax credits for SunZia Corporation Transmission Line Project, it has greatly influenced the feasibility of the SunZia Corp. project to be economically feasible. When these Energy Credits disappear has the BLM and the Federal Government made plans for the impact and damage this has done to the private sector, if and when SunZia fails? This is all being achieved on the backs of the US citizens and their interest must be addressed first and foremost, how are you addressing this issue?

(5) BLM and the Federal Government by allowing these easements and energy tax credits have set the stage for the feasibility and financial gain of SunZia Corp. to pursue this endeavor. Does the BLM and the Federal Government also have a plan in place for the restoration and compensation for the degradation and devaluation of the US citizens and private land owners within the impacted areas and view sheds?

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

1812	Response to Comment
1	The final location of the transmission lines can be adjusted within the study corridor to accommodate site specific conditions incorporating results of surveys and engineering. The Project includes two 500 kV transmission lines within a nominal 400 foot wide right-of-way. Additional transmission lines could fit within a study corridor; however, future proposals for new utilities would be subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
2	As stated in Section 2.4.11.3 of the DEIS "areas of permanent disturbance would be restored (by grant holder) in accordance with a Termination and Reclamation Plan approved by the BLM Authorized Officer." The applicant or owner's representatives will be responsible for implementation of the mitigation measures described in Section 2.4.12 of the DEIS, as a stipulation of the right-of-way grant.
3	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action. Please also see response to Comment No.2.

1849

From: Ginny Durham
To: BLM_NM_SunZia_Project; ginny.durham
Subject: Sunzia Powerline
Date: Monday, August 20, 2012 6:42:42 PM

1 The Sunzia project is not necessarily using renewable energy, so why should it continue to receive government funding and governmental support allowing it to go through less environmental scrutiny. The comment period should be extended to allow time to comment as well as looking at it more carefully. We should not sacrifice non-renewable resources for renewable energy. There are alternative projects that could make this project unnecessary.

2 The San Pedro valley should not be compromised by this project. The map was redrawn to use private property, (mine as well as my neighbors) so the NEPA project did not adequately look at the resources that would be affected. None of us were notified of the meetings, or the

3 deadlines to comment, and because of this the comment period should be extended and the property owners who could have power lines on their property should be notified before they are identified on the maps.

Ginny Durham
Vail Arizona

1849	Response to Comment
1	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action.
2	Alternative transmission line routes were identified during the scoping process. The alternatives were sited according to criteria identified in Section 2.2 of the DEIS, and included study corridors crossing private, state and federal lands.
3	The DEIS was made available for public review and comment on May 25, 2012. The BLM held ten public meetings and scheduled a 90-day public comment period that ended on August 22, 2012. In total, the public scoping for the SunZia project has included a total of 22 public meetings and 255 days of public comment. The routes depicted in the DEIS are centerlines of alternative study corridors, and individual property owners would be notified when the final location of the proposed 500 kV transmission lines is determined following surveys and engineering.

1866

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

[redacted]

CITY STATE ZIP

Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ■ Yes ☐ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:

1 We would like to register our opposition to the SunZia Southwest Transmission Project. We object to this project for various reasons. The main reasons being that:

1.) SunZia misrepresented itself as being a company that would be providing a significant portion of its energy through renewable resources, a fact that has been proven incorrect.

2.) There is no demand for the energy that would be provided in neither in Arizona nor California.

3.) The erection of the two huge power lines proposed would be devastating to the scenic beauty, the wildlife and the way of life of all that would be impacted regardless of the route chosen.

4.) The jobs that SunZia said would be created in Arizona for this project would not actually materialize.

It is just wrong that a company such as SunZia would be allowed to proceed with an unnecessary project that is against the wishes of the people impacted. The fact that the US Government is willing to give money to this company based on false representations of its renewable energy sources is unbelievable. The Government needs to do its homework before making such politically charged awards of taxpayer dollars.

Please count this comment as being from TWO people. Thank you

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

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1866	Response to Comment
1	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.
2	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.
3	Comment noted.
4	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action.

1881

From: James Bergstrom
To: BLM_NM_SunZia_Project
Subject: Comments on the SunZia Southwest Transmisson Project
Date: Thursday, August 23, 2012 12:05:40 AM

Bureau of Land Management (BLM)

New Mexico State Office

Proposed SunZia Transmission Project

P.O. Box 27115

Santa Fe, New Mexico 87502-0115

NMSunZiaProject@blm.gov

These comments are submitted as an integral part of the process prescribed in the National Environmental Policy Act (NEPA) for the proposed SunZia Southwest Transmission project, specifically directed toward the draft Environmental Impact Statement (DEIS). There is no need to withhold my personal information from public review.

Hello Mr. Garcia,

I am a resident of San Manuel, Arizona. I own a home in town and also own 40 acres of land 7 miles south of San Manuel in the San Pedro River Valley. I have been a landowner in this area since 1976.

I am firmly against the proposed SunZia Southwest Transmission Project. I strongly suggest the "*No Action*" alternative as your decision.

1 **My Reason to Promote the "No Action" Decision**

The original Project Purpose and Need stated that the proposed lines would be used *primarily* for the transmission of renewable energy. After much work by concerned citizens and groups over several years, the BLM finally changed the language of the

1881	Response to Comment
1	Comment noted.

1881

PP and N to state that transmission lines would "deliver electricity, including power generated from renewable energy resources". This was an improvement, but too late to convince anyone who reads between the lines.

1 I attended the earliest meetings for this project in Tucson as well as the recent round in San Manuel. At the most recent public meeting I spoke with a SunZia engineer, BLM Arizona Project Director Melissa Warren, and other consultants that were available for one-on-one discussion after the presentation. All of their opinions and statements regarding their answers to my questions at that meeting have been considered in my decision to support the No Action Decision. I spoke with them collectively for over 45 minutes.

From the start I have felt that the SunZia group has been couching this project as "environmental" and "involving renewable energy" for the sole purpose of *appearing* to be meeting the current administration's desire for energy independence as well as environmentally sound methods of electrical generation.

The chances of this project actually supporting *renewable energy* are extremely slim, but the BLM has again allowed the applicant to mislead the public on this point in this section and in the DEIS sections related to Cumulative Effects, Global Climate Change, Alternatives to SunZia, and Economic Impacts.

For BLM to select the San Pedro River Valley in their preferred alternative is wrong. The San Pedro River Valley could be best discussed as "*The Mitigation Corridor*". It serves as a brilliant jewel for the mitigation efforts of large companies such as Salt River Project, Arizona Public Service, Resolution Copper Company, and BHP, to name a few. Each of these large corporations has chosen the San Pedro River Valley in good faith to be one of the best-suited riparian habitats for high-quality mitigation lands. It is one of the last great places in Arizona and the entire Southwest. There is no actual evidence that this project will benefit the local, regional, or United States environment but there is *significant* evidence that this project will cause damage to the San Pedro riparian ecology.

Section-Specific Comments on the DEIS

2 **Table 1-2 in Section 1.4** is a very misleading table, apparently intended to emphasize the interest in developing "primarily renewable energy" projects within the SunZia project area. Since the table does not include all existing transmission owners within the SunZia project area, it cannot be used to once again invoke the phrase *primarily renewable energy* as a characterization of energy development potential.

1881	Response to Comment
2	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.

1881

2 **Section 2.3.3.3, Page 2-39,** *New Generation*: Large scale renewable energy generation could be accommodated in southern Arizona and southern New Mexico by upgrading existing lines. Also, with an alternative proposal such as the *Southline Transmission Project*, a reasonable increase in total generation could be accommodated at the same time, without developing an entirely new major infrastructure corridor through many parts of New Mexico and Arizona, as proposed by the SunZia project.

Section 2.3.3.3, Page 2-40, *Distributed Generation*:

3 This project, according to the SunZia engineer I spoke with at the San Manuel meeting, can be summed up as a "If you build it, they will come" project. The engineer stated that SunZia would not begin any construction unless they had confirmed contracts with electrical generation companies wishing to transmit energy on the proposed power lines. Natural gas electrical generation is likely to be the only energy source ready or willing to sign-on to the SunZia project in the next 5-8 years. This would include, of course, the companies that comprise the SunZia group, owners of approximately 1000 MW of natural gas holdings in southern Arizona and New Mexico. The proposed Bowie natural gas plant could contribute 1000 MW on its own, which would constitute up to two thirds of the transmission capacity on the first proposed line. Does this reveal a hidden agenda? A conflict of interest? Yes.

A significant technological breakthrough and/or conscious, societal change could make this line unnecessary or even obsolete. Distributed PV solar on individual home rooftops, local PV electrical plants, or home PV electrical generation and APS intertie could become (and likely will) so affordable that long-distance renewable energy transmission could vaporize before it truly begins. Why have wind fields in eastern New Mexico sending electricity to Arizona and California when they are already generating electricity locally?

4 The DEIS virtually dismisses the effectiveness of distributed generation, the fact is that distributed generation has been a key factor in providing Arizona with the ability to meet its RPS, without the need for imported power. It is likely that New Mexico, Nevada, and California will be able to meet their RPS without importation of renewable energy, in large part due to the success of distributed or locally produced generation. This DEIS section once again invokes the general policy of increasing transmission capacity, to the exclusion of any other policies related to energy efficiency and optimum use of existing infrastructure corridors.

5 **Section 2.3.3.3, Page 2-41 through 2-43,** *Tucson Area Upgrades:* With the proposed *Southline Transmission Project*, existing transmission systems can be upgraded in the Tucson Area, because *Southline* is appropriately scaled for this

1881	Response to Comment
3	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation. Several alternative routes connecting New Mexico and central Arizona were evaluated in the siting studies for the proposed SunZia 500 kV transmission lines conducted during the scoping process. Some of the alternatives (including the Preferred Alternative) were co-located along the existing TEP 345 kV transmission line corridor, which is considered a siting opportunity for new transmission lines.
4	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS. The BLM has considered other options including alternate transmission routes and transmission technologies such as distributed generation or system upgrades, but they were eliminated because they would not be practicable and feasible as described in Section 2.3.3 of the DEIS.
5	The Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way

1881

region.

5 **Section 2.3.3.3, Page 2-43 through 2-44,** *Double-circuit Structures:* These structures would become feasible with an appropriately scaled transmission project, such as the *Southline Transmission Project.*

Section 2.3.3.3, Page 2-44 through 2-45, *Environmental Impacts:* With the appropriately scaled *Southline Transmission Project*, there would be no need to install 500 kV lines through densely populated areas.

Mr. Garcia and BLM team members, please support and choose the "No Action" decision for this proposed SunZia project. You'll make a responsible choice in doing so and avoid a lot of ensuing conflict if you do not. There a plenty of well thought-out responses for you to gather any facts and figures concerning why this should be your choice.

Yours truly,

James Bergstrom

PO Box 444

San Manuel, AZ 85631

1881	Response to Comment
	See following page(s)

1882

From: James Callegary
To: BLM_NM_SunZia_Project
Subject: NM SunZia Project
Date: Tuesday, August 21, 2012 10:48:32 PM
Attachments: CWG_Southline_Comment-6-11-13.pdf

To Whom It May Concern,

I would like to express my strong objection to the construction of the SunZia Transmission Line for the following reasons.

1 1. This project will significantly increase habitat fragmentation of a large portion of the Lower San Pedro River Valley, the single most important flyway for migratory birds and migration corridor for other species between the Rio Grande and the Colorado River. It is of continental scale importance, connecting the highlands of the Colorado Plateau and the Rocky Mountains with the highlands of Mexico.

2 2. The BLM itself removed renewable energy language from the Draft EIS statement of "Purpose and Need", and yet this project is still being touted as a "green" project. This and the continued use of federal funds intended for scoping of renewable energy projects is unconscionable and tantamount to misappropriation of funds.

3 3. There is an alternative transmission line project, the Southline Project, that is also in the scoping phase and would have a much smaller impact on people and habitat. Although I would rather see disseminated and close-to-point-of-use power generation, unlike SunZia the Southline project makes use of existing transmission corridors and would supply power much more effectively to southeast and central Arizona (see attached letter from the Cascabel Working Group). Thus costs would be relatively lower and impacts to sensitive lands minimized.

4 4. The SunZia Transmission Line Project preferred routes would interfere with or seriously impair conservation land, and conservation efforts that are well underway in the Lower San Pedro River Valley such as Aravaipa Canyon. This is a place with such great ecological significance to the state of Arizona and to species using the San Pedro corridor that it is difficult to believe that this route was not proposed as a joke and/or decoy.

If you have any questions or need further information, please feel free to contact me.

Regards,

James Callegary
1240 E Seneca St
Tucson, AZ 85719

1882	Response to Comment
1	The conclusion of the analysis in the DEIS (Section 4.6.5) is that mitigation measures could be effectively implemented to minimize the potential for habitat fragmentation in these areas. For example, selective mitigation measures SE 4, 5, 6 and 8 would reduce the disturbance caused by access road construction and avoid sensitive features (see Chapter 2).
2	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action.
3	The Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.
4	Section 4.6.4.6 includes descriptions or potentially affected conservation areas.

1892

From: James Bergstrom
To: BLM_NM_SunZia_Project
Subject: Comments for SunZia Project
Date: Thursday, August 23, 2012 12:06:42 AM

Bureau of Land Management (BLM)

New Mexico State Office

Proposed SunZia Transmission Project

P.O. Box 27115

Santa Fe, New Mexico 87502-0115

NMSunZiaProject@blm.gov

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1892	Response to Comment
1	Comment noted.

1892

state that transmission lines would "deliver electricity, including power generated from renewable energy resources". This was an improvement, but too late to convince anyone who reads between the lines.

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1892

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Section 2.3.3.3, Page 2-40, ***Distributed Generation***:

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5 **Section 2.3.3.3, Page 2-41 through 2-43,** ***Tucson Area Upgrades:*** With the proposed *Southline Transmission Project*, existing transmission systems can be upgraded in the Tucson Area, because *Southline* is appropriately scaled for this region.

1892	Response to Comment
3	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation. Several alternative routes connecting New Mexico and central Arizona were evaluated in the siting studies for the proposed SunZia 500 kV transmission lines conducted during the scoping process. Some of the alternatives (including the Preferred Alternative) were co-located along the existing TEP 345 kV transmission line corridor, which is considered a siting opportunity for new transmission lines.
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1892

5 **Section 2.3.3.3, Page 2-43 through 2-44,** ***Double-circuit Structures:*** These structures would become feasible with an appropriately scaled transmission project, such as the *Southline Transmission Project.*

Section 2.3.3.3, Page 2-44 through 2-45, ***Environmental Impacts:*** With the appropriately scaled *Southline Transmission Project*, there would be no need to install 500 kV lines through densely populated areas.

Mr. Garcia and BLM team members, please support and choose the "No Action" decision for this proposed SunZia project. You'll make a responsible choice in doing so and avoid a lot of ensuing conflict if you do not. There a plenty of well thought-out responses for you to gather any facts and figures concerning why this should be your choice.

Yours truly,

Celeste Andresen
121 W 6th Ave

San Manuel, AZ 85631

1892	Response to Comment
	See following page(s)

1924

From: Jim Malusa
To: BLM_NM_SunZia_Project
Subject: Adrian Garcia, BLM Project Manager, re: Comments on SunZia Southwest Transmission Project
Date: Wednesday, August 22, 2012 5:03:34 PM
Attachments: Comments on SunZia Southwest Transmission Project.doc

The following is also attached as a word doc.

Dear Project Manager,

Congratulations on the handsome website and interactive map. My comments pertain to Arizona, Group 4 alternatives, west of the Willow 500 kV substation.

I'm familiar with the region, and particularly the lands along Preferred Alternative Subroute 4C2c route, especially C441 and C450. As stated on page 2-104, "From the river crossing, the preferred route continues to the northwest, located between 3 and 6 miles west of the San Pedro River, crossing hilly, grazing lands." This summary is of course just a summary, but nowhere else in the DEIS is there any indication that these lands have been thoroughly investigated. The vegetation map, Figure M 6-1W, fails to include the sort of detail that would truly aid routing decisions, and serves only to place a three level hierarchy on the 'value' of vegetation types. The actual landscape is far more complex, with, for instance, the BLM preferred route crossing rare riparian habitat in Redrock, Paige, Roble, and Buehman Canyons. What's more, these canyons are unique in holding Sonoran Desert Upland vegetation amid an essentially Chihuahuan desert landscape of limestone. Construction will inevitably bring in the invasive grass known as buffelgrass, which in turn leads to habitat transformation (Olsson et al, 2011: *Sonoran Desert Ecosystem transformation by a C4 grass without the grass/fire cycle*. Diversity and Distributions, (2011) 1–12.). 1

I understand the difficulty in placing a value on such things, but I suppose that's your job. I'm a botanist with the University of Arizona, and among my jobs is making vegetation maps for the federal government. A recent joint project with the Forest Service and BLM resulted in a Land Type Association map of your western study area. I saw no mention of this map in the DEIS (I may be mistaken). This is exactly the sort of map which should have been consulted by your planners, as it comprehensively evaluates soils and landform, which is essential for modeling the hydrologic impacts of the power line. (The map and supporting data can be found at http://www.azfirescape.org/catalina/landscape_types)

Finally, there is the matter of aesthetics. We have, as a culture, diminished vast areas of wilderness for projects such as this, which is why I object strongly to the preferred alternative. For this section of the powerline, only 90.4 of the 161.2 miles are in existing corridors, which is 27.9 miles more than the alternative route through Tucson (page 2-113). The preferred alternative puts 70.8 miles of powerline through pristine lands. Further, as shown in Table 2-15, the preferred alternative shows 928 acres 'permanently' disturbed – the highest of the alternatives. 2

If you can reject a corridor along I-10 through Tucson in part because, among other things, the City of Tucson comments that "Factors such as aesthetics play a critical role..." (2-33),

1924	Response to Comment
1	Because the analysis presented in the source provided only refers to one portion of the study area, it would not adequately support comparisons among alternatives during the NEPA process. Project-wide vegetation mapping for the purposes of impact analysis and comparison of alternatives necessarily used regional-scale sources that encompassed the entire study area in Arizona and New Mexico at a scale that was approximately equivalent between states (see Section 3.6.3).
2	The BLM Preferred Alternative was selected (as stated in Section 2.5.4 of the DEIS) because it would maximize use of existing utility corridors and infrastructure, minimize impacts to sensitive resources, minimize impacts at river crossings, minimize impacts to residential and commercial uses, and minimize impacts to military operations within the restricted airspace north of the WSMR.

1924

2 then surely you can understand that a powerline running through wilderness presents far greater damage to aesthetics. Please reconsider your route, and in the meantime, I'll pray that SunZia reconsiders the entire plan.

Sincerely,
Jim Malusa

Office: Biological Sciences East, Room 204
Mailing Address: Biological Sciences East, Room 325
School of Natural Resources and the Environment
University of Arizona
1311 E. 4th Street
Tucson, Arizona 85721
520-621-6424 (wk)
520-795-2622 (hm)

1924	Response to Comment
	See following page(s)

1929

From: joan-warfield@cox.net
To: BLM_NM_SunZia_Project
Subject: Proposed SunZia transmission line
Date: Wednesday, August 22, 2012 8:51:13 PM

Dear Project Manager Garcia:

I am deeply dismayed over the proposed siting of the SunZia transmission line through the lower San Pedro River Valley. I consider selection of this location as the preferred alternative a most unfortunate development and think that siting it through the Aravaipa route would also constitute a very bad choice. I favor siting the line along an already existing corridor, and failing that possibility, I recommend the BLM take a No Action position on this proposal.

1 I worked for a number of years as a docent at the Arizona Sonora Desert Museum in Tucson. As part of our training, we learned that 90-95% of Arizona's riparian habitat has been lost or seriously degraded from channelization and development for agriculture, mining, and urbanization in the modern era. What a tragedy, perhaps a travesty, that the SunZia project sells itself as a green energy project, yet decides to pass through what the Nature Conservancy called one of -- not just Arizona's --, but the country's "last great places." The lower San Pedro River Valley is a treasure that, once degraded, cannot be restored or replaced.

2 I am further dismayed over the purported green credentials of this project, when it appears that the company seeking approval for the transmission line will almost certainly develop a natural gas plant in Bowie that would use the SunZia line. And further, it seems that the development of wind and solar projects in New Mexico to send through Arizona via SunZia to California is far less certain than the Bowie plans. In many parts of the country natural gas development is on a very fast track, while wind and solar lag far behind.

I attended the open-house meeting in Tucson on July 17, 2012. I found it strange that nothing was mentioned by the presenter about the Bowie natural gas plant. Is the BLM trying to hide something?

I have been at government meetings in the past, specifically with the City of Tucson, where this open-house meeting format was followed. On the July 17 occasion, as in my previous experiences with this strategy, it gives the impression that the meeting organizers really do not want to hear much from the public, nor do they want the public to hear from each other.

3 In summary, construction of the SunZia transmission line along the preferred alternative route through the lower San Pedro River Valley would constitute an immense environmental loss, and the green credentials of the project are dubious at best. I urge you in the strongest possible terms to either reconsider siting along an existing corridor or to recommend a No Action decision on this proposal.

Thank you for your attention to my concerns.

Sincerely,

Joan Warfield

1929	Response to Comment
1	Comment noted.
2	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation. Several alternative routes connecting New Mexico and central Arizona were evaluated in the siting studies for the proposed SunZia 500 kV transmission lines conducted during the scoping process. Some of the alternatives (including the Preferred Alternative) were co-located along the existing TEP 345 kV transmission line corridor, which is considered a siting opportunity for new transmission lines.
3	Comment noted.

1931

From: Joanne Schmidt
To: BLM_NM_SunZia_Project
Subject: Comment regarding proposed location for Rio Grande power line crossing.
Date: Tuesday, August 21, 2012 7:08:46 PM

1 The Rio Grande corridor from Ladd Gordon Refuge (north of Bernado NM)
to Bosque Del Apache Refuge (South of San Antonio NM)
is a unique area, a "National Treasure" that draws people from all over the world.

Would you locate above ground power lines through Balloon Fiesta Park (ABQ NM),
the Jefferson Memorial, Old Faithful at Yellowstone park, or across the White House lawn?
Of course not !!
Yet that is exactly what you propose to do to the Rio Grande Wildlife Refuge Areas.

2 Migratory birds do no better with power lines in their path, than hot air balloons.
Birds will die because they cannot visually "see" power lines.
This flyway is essential to their well being.

3 Above ground lines will degrade the area's scenic beauty and lessen its
attraction for tourists and wildlife photographers. .
These people will find a different destination where lines don't spoil the photo background.
This will have a negative economic effect on the area community.

You have options to cross the River elsewhere
and thereby contribute to the preservation of this unique and beautiful habitat.
I hope you will do so.
Once ruined, the pristine. riparian beauty will not come back.

Very Truly Yours,
Joanne Schmidt
Rio Images, FBDA

1931	Response to Comment
1	Comment noted.
2	None of the alternative transmission line would cross wildlife refuges.
3	Comment noted.

1932

Comment on Draft EIS for Proposed SunZia Southwest Transmission Project

Clifford M. Baker
PO Box 332
Monterey, MA 01245

Add to mailing list	Yes
Withhold personal information	No
Notification of EIS availability	Yes

The BLM is to be congratulated for the work completed to date in compiling the Draft EIS for the Proposed SunZia Southwest Transmission Project.

My study of the DEIS reveals numerous instances, however, of vague statements of important factors and criteria, and of unfortunate 'averaging' of critical figures over non-homogeneous ranges of data. In addition there is no consideration of an important proposed Lower San Pedro National Wildlife Refuge in the locality crossed by the Preferred Alternative Route. These features, coupled with the fact that the Preferred Alternative in the section which I studied (Subroute 4C2c) clearly fails to satisfy the BLM's stated ranking criteria as well as other alternatives, leads me to **urge you to declare a No Action decision on this proposal**.

1 Regarding the selection of the BLM Preferred Alternative Route, page 4 of Volume 1 (Section ES.3.4) of the DEIS states that:

This route was selected as the BLM preferred alternative because it would

- maximize use of existing utility corridors and infrastructure
- minimize impacts to sensitive resources
- minimize impacts at river crossings
- minimize impacts to residential and commercial uses, and
- minimize impacts to military operations within the restricted airspace north of the WSMR

2 Table 2.12 (Volume 1, Chapter 2, p 107) reveals that the only factor for which 4C2c would rank lower than Subroute 4C3, for example, is the impact on residential uses, simply because there are more people in the Tucson area than in the San Pedro Valley area. In all other respects, 4C3 should be a preferable route: Route 4C2c parallels and uses a much smaller percentage of existing utility corridors; it would have more impacts on sensitive resources (including a larger "permanent disturbance"); the river and riparian effects would be much greater; and the impact on military operations would presumably be the same. Are we led to understand that the economic considerations for the Tucson urban area trump all the environmental factors in this decision (see Section 2.3.3.1, p33)? Subroute 4C3 clearly should have been selected; if Tucson refuses to allow the construction, then the project should not proceed.

Table 2-12 presents data illustrating my point about the unacceptable "averaging" of data over a range of non-homogeneous points. For example, the 161.2 miles of Subroute 4C2c are reported to be subject to "temporary disturbance" during construction at the rate of 7.9 acres/mile, which is exactly the same rate shown for Subroute 4C3, which follows much more level terrain. Within each section there are sure to be variations in topography and thus amount of disturbance per mile of road construction, but it is not believable to state that the 'average' rate is the same for these routes. Within 4C2c there would be large

1932	Response to Comment
1	The BLM Preferred Alternative was selected (as stated in Section 2.5.4 of the DEIS) because it would be most responsive to the criteria listed. However, a quantitative ranking or averaging was not directly applied for selecting a preferred route. The proposed Lower San Pedro wildlife refuge would not likely be impacted the BLM Preferred Alternative.
2	There is a larger area of ground disturbance associated with the longer transmission line routes, because the amount of area required for construction is generally proportional to the length of the route. The BLM Preferred Alternative (Subroute 4C2c) would cross the San Pedro river and riparian zone at the same location as Subroute 4C3 (Tucson).

1932

2 areas where the disturbance is far greater, and the potential permanent environmental damage from the "temporary" disturbance would be much greater.

3 I am further disturbed by the vague descriptions of, and apparent faith in, many of the stated mitigation methods, both standard (ST) and selective (SE) as described in Tables 2.10 and 2.11, respectively. It is accepted science, for example, that simply driving on fragile desert soil with any vehicle can create permanent or long-term damage to the soil structure and thus the biotic community and erosion resistance of that area (Table 2.11 #3, p 2-91). In much of this area, "restoration" of disturbed ground is simply not possible (Table 2.10 #8, p 2-86). Page 2-69 states that "Affected private landowners and agencies would be consulted before road upgrades or construction begins," which could easily be construed as "we are going to build what we want, but we will tell you first."

4 Other issues that have been either ignored or given only passing treatment are also evident in the DEIS. Two examples are the effect on critical habitat protection for species such as the Southwestern Willow Flycatcher (ES.4.5), and the issue of EMF generation by the transmission lines and their effect on not only human populations but also all other forms of life in the area (2.3.3.1). As mentioned above, the proposed Lower San Pedro National Wildlife Refuge would be adversely affected by this project. The environmental attributes of the San Pedro River valley are well-known and are an important resource for us all. That the BLM could select that route for a project of this nature is unbelievable.

5 I understand and appreciate the BLM's undertaking this DEIS as mandated by the NEPA, and in response to the federal policy directives that have come from Washington pushing for more development of renewable resources for the national energy supply. But I am alarmed that the DEIS would quickly dismiss some of the alternatives to this method of supplying such energy, as covered in section 2.3.3.3, particularly DSM (p 2-38) which includes conservation and sensible reduction in use, and Distributed Generation (p 2-39), which should be the primary focus for energy production in the Southwest.

6 There is not enough need for this project to proceed with the permanent environmental cost that would be created. Please look at the long-term picture of life in the Arizona-New Mexico environment and put a stop to further development of this proposal by denying the permit with a **No Action** decision.

Thank you for your consideration.

Sincerely,

Clifford M. Baker

1932	Response to Comment
3	The applicant or owner's representatives will be responsible for implementation of the mitigation measures described in Section 2.4.12 of the DEIS, as a stipulation of the right-of-way grant.
4	The potential effects to the Southwestern Willow Flycatcher habitat have been addressed in Section 4.6.5.4 of the DEIS. EMF effects to wildlife have not been identified. Please also see response to Comment No. 1 with regard to the Lower San Pedro wildlife refuge.
5	Comment noted.
6	Comment noted.

1958

From: Joyce Hostetter
To: BLM NM SunZia Project
Subject: Sunzia project
Date: Sunday, August 12, 2012 1:39:40 PM

To whom it may concern:

1 Am a resident of Tucson and past resident in the Benson, AZ area. I continue to go to the Benson and surrounding areas for my 'country fix' and to ride horses on many trails around and about that area. I am very familiar with the Sunzia project having attended public meetings required of them. At first it seemed that the main issue was 'where' the project power lines would go - what route would be best. By now after many people have delved into the nuts and bolts of what Sunzia is actually doing and I am much more greatly informed, I must submit my decision is that Sunzia SHOULD NOT continue anywhere. There are a great many reasons, most of which are as follows:

2 ~ SunZia does not have fully funded backing – it originally said there would be no taking of government funds but would now receive gov't funding. With our national debt, I as a taxpayer see no sense to add more for no gain to the citizens and only gain for the corporation and its backers/investors.
~ Calif has its own renewable plans and has said publicly it doesn't need this transmitted power.
~ SunZia's purpose is highly suspect with no proof that citizens in any area will profit from this both with power and financially. Some may have added jobs in specific areas but it does not appear to add enough to make the benefit outweigh the deficits.

3 As for the areas that SunZia is proposing to place their power line routes, none appear to be without huge impact. Some routes will impact private homes and yards, other routes with impact wilderness areas & wildlife which damages quality of life in a number of ways which would take a whole other page of study results of which I am sure of which BLM is already acutely aware. Please note the following pertaining to this issue:

1958	Response to Comment
1	Comment noted.
2	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action.
3	Comment noted.

1958

~ The major national environmental groups, Grijalva and Giffords recommend NO ACTION.

As for the route through the central San Pedro Valley, there are a great many reasons this should not be a chosen route as routes are being considered (again no routes should be considered, only shutting this Sunzia project down is the only right answer). Reasons not to use the central San Pedro Valley is as follows:

~ The middle San Pedro valley is being considered by Fish and Wildlife Service as a refuge. With this happening, BLM should be working with Fish and Wildlife Service as both should have the best interests of wilderness and wildlife foremost in their minds and actions.

4

~ Habitat fragmentation is a major issue for many species when roads to and underneath power lines are bladed – at present major mammals travel in an unfragmented habitat from the river to both mountain ranges east and west.

~ Other than the Grand Canyon national park, the middle San Pedro is the second largest unfragmented region in the state with the Aravaipa wilderness (the route SunZia prefers as it would cost less) containing NO ROADS.

There is far more damage that would happen to the quality of life for all people whether living in or near the area of the wild lands, using the lands for recreation and appreciation, and for just knowing with the peace of mind that there is open land and not cities upon cities.

Please read all the above and all that you receive from others and digest it. Once all the facts are understood, there is no way anyone could possibly see any justification to this Sunzia project. It is profit to those who are involved in it from investors to management - all receiving profit from it with little to no gain to the people who this project will effect. It is another 'bridge to nowhere'. If put to a public vote by people in and around these project routes proposals if completely informed, would not doubt vote in a huge majority against this Sunzia project. That includes large and small cities as well as rural residents/citizens/taxpayers.

I propose and insist on the Sunzia project to be stopped. No Action is the answer

1958	Response to Comment
4	Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance and thereby reduce the amount of new habitat fragmentation. Approximately 90 miles (56%) of the BLM Preferred Alternative (Subroute 4C2c) would be parallel to existing or designated utility corridors, as stated in Table 2-15 and shown on Figure M10-4W Utilities of the DEIS.

	1958	Response to Comment
1958 to Sunzia. Sincerely, Joyce B. Hostetter 8410 E. Pima St. Tucson, AZ 85715 520-991-8706 loveofthehorse@gmail.com This again leads me to		See following page(s)

1989

From: kdcyr@comcast.net
To: BLM_NM_SunZia_Project
Subject: Comments on Draft EIS for the SunZia Southwest Transmission Project
Date: Thursday, August 16, 2012 1:43:14 PM

Comments Submitted by Karen Cyr, 4921 Flanders Ave., Kensington, MD 20895

I would like to associate myself with the comments provided on behalf of the Friends of the Bosque del Apache National Wildlife Refuge on the Draft Environmental Impact Statement and Resource Management Plan specifically as it relates to route determination and the biological and visual resources, land use, environmental justice and economic conditions affected by Route Group 1 in New Mexico, as set forth in detail below.

1 Briefly, I believe certain alternative routes have been eliminated prematurely; the analysis of potential avian collisions is based on inadequate data, e.g., a number of collection days were before the sandhill cranes had arrived in the area; impacts on conservation easements in the affected area are omitted or inadequately described;and environmental justice concerns for the affected populations have not been adequately analyzed. In sum, the preferred alternative would create impacts that could not be economically mitigated.

Route Determination

2 I oppose any route with an aerial crossing of the Rio Grande between Bosque del Apache National Wildlife Refuge and Ladd S. Gordon Waterfowl Complex, in particular the San Antonio crossings identified as the 1B subroutes and the current BLM preferred alternative. I disagree with the elimination of alternative routes that may minimize impacts on biological resources, in particular migratory birds. The WSMR Routes 1, 1a, and the unnamed route west of the Sierra Ladrones WSA and Sevilleta NWR were eliminated because they were deemed incompatible with management policies or plans. Likewise routes with a southern crossing, including 1C1, 1C2, 1C3, 2A, and 2B, were eliminated because the Department of the Army indicated that they would compromise their mission, and rights-of-way could not be granted without significant and economically infeasible mitigation measures. However, wildlife experts, including representatives of the Cooperating Agencies, have indicated that a river crossing in the vicinity of Belen or south of Elephant Butte would have less of an impact on migratory bird populations. Eliminating those routes prior to full evaluation and scoping presented unfair bias for the landowners involved and leaves too many questions as to the feasibility of those routes for meeting multiple needs of the stakeholders.

Biological Resources

The Analysis of Potential Avian Collisions with Transmission Lines at Four Locations on the Rio Grande in New Mexico cited in the EIS presented only a snapshot of bird

1989	Response to Comment
1	A discussion of routes previously considered, but eliminated is included in Section 2.3.3 of the DEIS. Please also see responses to comment Nos. 1989 2-7.
2	Both alternatives were studied. A route (WSMR Route 1/1A) that would cross north of the Sevilleta NWR and then turn south west of the Sevilleta NWR was eliminated primarily because of other restrictive land designations on BLM land west of the Sevilleta NWR, such as ROW exclusion areas, and would not be compatible with Cibola National Forest land management policies (DEIS Section 2.3.3.1, pg. 2-29). As stated in the comment, an alternative that would follow the western edge of the WSMR (east of the Bosque del Apache NWR), was eliminated because congressional approval would be required to release BLM's Antelope WSA in order to allow a utility right-of-way.

1989

use in the corridor. Sixty-four surveys, or approximately 32 site-days, at the San Antonio North site is a poor sample size to try to quantify effects on a susceptible population such as the Rocky Mountain Population (RMP) sandhill cranes, especially given that some of the sampling period fell prior to their arrival in the region. The variability in the counts per hour and flight height between the San Antonio North and South sites makes predictions for the preferred route, which was not studied, impossible. Data from the San Antonio North site for the August to December 2010 period indicate an average flight height of 47.97 meters, or roughly 157 feet. This flight level is within the proposed range of tower heights, 100'-175', and slightly above the mean height of 135'. Given that cranes are especially susceptible to collisions rising from or descending to feeding or roosting areas, their daily movements between Bosque del Apache NWR and the Ladd Complex will put them in constant danger. 3

The variability in flight data between the two sampling periods brings the fatal collision estimates into question. The fact that cranes are exposed to other threats, including multiple power lines, throughout their distribution, should not be used as justification to add to their challenges. Energetically, winter is a difficult time for these birds, and safe movement up and down the Valley is a key component in maintaining body condition and preparing for upcoming life cycle requirements. As stated by Rod Drewein, the Middle Rio Grande Valley is the most important landscape in the annual life cycle of the RMP cranes. This fact alone should elevate the required level of research and analysis of any proposed landscape modification in the Valley.

Cranes are of concern, but impacts aren't restricted to that species. All birds and bats must be protected. If there are conflicts between lowering towers to reduce crane collisions and raising towers to prevent habitat disturbance that would affect Southwestern willow flycatchers, then more research is warranted and the route needs to be relocated to other sites determined to be of less impact on all avifauna. Bird diverters are an oversimplified solution to a much greater placement issue.

Land Use

More than 500 acres of conservation easements are in development or have been completed along the floodplain between Bosque del Apache NWR and Bernardo, the details of which have been given to SunZia by the Rio Grande Agricultural Land Trust. The EIS Section 4.17.3.2 indicates that conservation easements are covered in Section 3.10 under the past and present activities and land uses within the study area, but there is no mention of any conservation easements in our region. These special land designations and restrictions are a glaring omission in the route analysis and must be fully evaluated and presented to the public, as well as the parties involved, before any routes are determined. Conservation easements take years of planning and implementation, but they are becoming a critical tool in restoration and preservation of our vulnerable habitats. Furthermore they promote collaboration between private landowners and non-profits or governmental entities for greater conservation goals. Diminishing the purpose and relevancy of these easements by crossing or otherwise impacting them would set back the progress that has been 4

1989	Response to Comment
3	Variation in flight patterns between survey locations is expected, and the range in the survey results is reasonable. Approximately 3 times as many birds per hour were observed at the San Antonio South survey location, primarily resulting from a large difference in the number of Red-winged Blackbirds (approximately 4 per hour at San Antonio North, and 31 per hour at San Antonio South). Numbers of Sandhill Cranes and their flight heights were relatively similar between the North and South survey locations. Each of these survey locations was within a wider floodplain than the BLM preferred alternative, with greater amounts of farmland and riparian habitat present. As discussed in section 4.6.5.2, "The north river crossing location (subroutes 1A and 1A1) is located approximately 12 miles north of the San Antonio river crossing location (subroutes 1B1, 1B2, 1B2a, and 1B3). When compared to the San Antonio crossing, the floodplain is narrower at the north crossing with lower amounts of farmland and riparian woodland used by foraging Sandhill Cranes, waterfowl, and other migratory birds. However, this could serve to constrain bird flight to a narrower corridor. The north river crossing location is also farther from important night roosts than the San Antonio crossing, possibly reducing daily use by cranes and waterfowl. The avian collision risk study estimated that, while collisions would occur, effects at the population level are not expected."
4	A discussion regarding conservation easements has been added to Section 4.10 of the FEIS.

1989

made in the Middle Rio Grande Valley.

Visual Resources

5 The visual impact of these power lines has been greatly underestimated. In an area where miles of the Rio Grande Valley are visible from I-25, as well as the myriad access roads to residences and recreation areas, these lines will be a steel wound bisecting our lush corridor and our community. The simulations don't give a full representation of the visibility of these towers, which at 100'-175', are taller than the Rio Grande cottonwoods (average height <90') that comprise the riparian corridor. Stating that the lines "would be partially screened by riparian vegetation" is not only inaccurate, but misleading as the vehicle river crossing is only one vista that will be marred by the presence of the lines. Furthermore, once a new corridor has been established, such as the preferred route northeast of Socorro, the door will be opened for other utilities or transmission lines to follow suit, further fragmenting our habitat and our viewscapes. Trying to quantify such subjective qualities as scenery and view belittles the value of the landscape to the people that call the area home and the thousands who visit each year to drive and bike our scenic byways, hike our backcountry, and photograph our sandhill cranes and snow geese as they fly down river at sunset over golden cottonwoods set against the stratified hills.

Environmental Justice and Economic Conditions

Environmental justice populations characterize Socorro County, and the fact that the density of those populations in immediate proximity to the power lines is low, doesn't mean that the entire county is not affected. From the small family farms struggling to maintain in multiple seasons of drought, to the small businesses seeking to build a tourism-based economy around outdoor recreation, our community is intertwined, and the ripple effect of this project will be widespread. Socorro County may not have a land use plan to reference, but the mission of the County to protect its trust resources and serve its people warrants consideration; however, the EIS has considered the needs of all other stakeholders first in the determination of alternative routes. It
6 cannot be said that jobs for construction and operation of the transmission lines will directly benefit Socorro County, but it can be proven, as evidenced by the turnout at the public meetings, that the citizens are opposed to the lines in this area. Socorro County is being run over by this all-loss and no-gain project.

Conclusion

Whether it is threats to biological resources, compromises to restoration projects and conservation easements, or scars across the community, there are elements of this proposal that remain under-evaluated and stakeholders that remain underrepresented. This project cannot and should not be pushed through as proposed with the preferred alternative route or any San Antonio crossing. To echo the conclusion of the WSMR regarding impacts of alternate routes through their lands, the BLM **preferred alternative route north of Socorro or San Antonio crossings would cause "adverse effects that could not be economically mitigated.**

1989	Response to Comment
5	For the DEIS, simulation locations were selected to show a range of impacts to viewing locations including residences, recreation areas, and travel routes throughout the study area. The DEIS discloses impacts to viewers including residences, recreation areas, and travel routes, in particular high impacts have been identified for recreation users of the Rio Grande river crossing (Link E180), as stated in Section 4.9.3.1 and as illustrated on Map 9-2E of the DEIS. Also the river crossing was identified as Class A high scenic quality, which would result in a moderate-high impact for the Project. The statement that the project would be partially screened by vegetation is an accurate statement as demonstrated by the simulation. Clearing would occur at the crossing; however, due to existing vegetation that surrounds the project crossing the lower portion of the transmission line would be screened from this KOP (viewpoint for simulation).
6	Comment noted.

2006

New Mexico Tech

Langmuir Laboratory

August 22, 2012

Bureau of Land Management
SunZia Transmission Line Project
P.O. Box 27115
Santa Fe, NM 87502-0115

Re: Comment on Draft EIS

Gentlemen:

The undersigned members of the Langmuir Laboratory group submit the following comments on the Draft EIS for the proposed SunZia transmission line:

1 1. The EIS completely misses addressing the impact that the proposed line (and eventual second line) will have on scientific research facilities that exist along the preferred route. Of particular concern is the effect the lines will have on the operations at Langmuir Laboratory in the Magdalena Mountains. Another important research facility not addressed is the Long Wavelength Array (LWA) radio telescope facility, currently starting to be constructed and operated under the auspices of the University of New Mexico.

2. Neither of the above are mentioned or identified in the Draft EIS, much less evaluated. Each requires quiet electromagnetic environments for their sensitive, state-of-the-art observations. The impact of the proposed power lines upon these facilities and their scientific research needs to be fully assessed in the EIS. The electromagnetic impacts are similar in nature to those raised by White Sands Missile Range (WSMR), whose concerns received considerable attention in the Draft EIS process, causing the project area to be expanded to include a north crossing of the Rio Grande and selection of this basic route (A1 and A1A) to be the preferred alternative.

3. The unexpected re-routing runs directly by the Langmuir Laboratory for Atmospheric Research, a nationally and internationally recognized observatory for studies of lightning and thunderstorms. The Laboratory is located in the area of South Baldy peak and was established in the early 1960s. Every summer it attracts a number of investigators from around the U.S. and internationally to study storms that form over this natural laboratory. The research studies are supported by the State of New Mexico and by a variety of Federal agencies and private corporations, including the National Science Foundation, NASA, and DARPA, with funding totalling millions of dollars. Storms forming over and around the Magdalena Mountains propagate in eastward and northward directions, directly over the path of the preferred alternative.

4. In 1980, 31,000 acres of the Cibola National Forest around the laboratory were officially recognized by the U.S. Congress as a Scientific Research Site, via Public Law 96-550 (see http://langmuir.nmt.edu/about/public-law-96-550). The Site was directed by congress to be jointly managed by the U.S. Forest Service and New Mexico Tech 'primarily for scientific research purposes' and 'to enhance scientific research objectives'. Among other projects currently being conducted at the Laboratory are DARPA-funded, cutting-edge studies of currently important

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2006	Response to Comment
1	The Applicant has evaluated potential EMI related effects that could result from operation of the SunZia Project, and has proposed the following mitigation measures to reduce the potential for impacts to the Langmuir Laboratory research program and facilities. With the proposed design of triple-bundled phase conductors and attendant horizontal phase spacing, conductor surface gradients for SunZia should be lower than most existing 500 kV transmission lines. As corona (and radio interference, television interference and audible noises) is a function of the conductor surface gradient, SunZia's proposed design would substantially limit this effect. As further mitigation to minimize conductor surface gradient contributions to EMI, SunZia will ensure that complete hardware assemblies and spacer dampers (devices installed between the bundled phase conductors to maintain longitudinal separation along the span lengths) are designed and tested to further minimize EMI when fully assembled and energized. As part of equipment specifications, insulator strings, hardware assemblies and spacer dampers will be subjected to laboratory corona and radio interference testing. SunZia believes that through implementation of hardware specifications and testing the assembled project facilities would be free of visible corona and radio interference voltages (see letter Tom Wray, Project Manager, SunZia, to Adrian Garcia BLM Project Manager dated 11/26/2012).

scientific issues concerning lightning phenomena, including rocket-triggered lightning, balloon-borne in-cloud measurements aimed at understanding how lightning is initiated and propagates inside storms, and discharges emanating from the tops of storms.

5. Two important state-of-the-art instruments at Langmuir Laboratory that would be affected by the proposed line are a large, multi-station Lightning Mapping Array (LMA) and, more recently, a Broadband Digital Lightning Interferometer (DITF). Both operate in the VHF frequency band and image the 3-dimensional structure and development of lightning discharges in spectacular detail, both spatially and temporally.

6. The LMA has been developed over the past 15 years by Langmuir researchers as an outgrowth of earlier research at the Laboratory. Without exaggeration, LMA networks have revolutionized the study of lightning and thunderstorms. An increasing number of the mapping networks have been set up at locations around the U.S. (and internationally) for research and operational weather forecasting purposes. These include LMAs being operated by the University of Oklahoma and the National Severe Storms Laboratory in Oklahoma, by NASA Marshall Space Flight Center in northern Alabama, in the Washington DC Greater Metropolitan Area for the National Weather Service, and at WSMR in New Mexico, Dugway Proving Ground in Utah, and at the Technical University of Catalonia in Spain. Additional networks have recently been set up in Northern Colorado, West Texas, and over the Houston Metropolitan area. To be installed within the next year are networks at Kennedy Space Center in Florida and on the French island of Corsica for the University of Toulouse. The LMA networks typically consist of 10-15 stations spread out over a 50-100 km diameter area, and monitor lightning and convective storm activity out to several hundred kilometers distance from their center.

7. The most sensitive LMA, and the one used for continued development of the LMA networks and technology, is the system being operated at Langmuir Laboratory. The Langmuir LMA has been painstakingly developed over the past decade and currently consists of 28 stations spread over a 65 x 45 kilometer area both at high altitude around the mountain-top observatory itself and on the high plains surrounding the laboratory. By virtue of being able to place the individual stations in radio frequency (RF)-quiet locations, the Langmuir LMA is able to detect and locate the sources of VHF lightning radiation down to received power levels of 10^{-12} watts (one trillionith of a watt). It does this by accurately measuring the arrival times of impulsive radiation events (radio 'static') at the widely spaced stations. The stations passively listen for the radio signals in a locally unused VHF television channel, in this case TV Channel 3 (60-66 MHz). The arrival times are measured with an accuracy of 30 nanoseconds (30 billionths of a second). During this time the radio signals travel about 10 meters, enabling the LMA to determine the source location with a high degree of precision.

8. The attached figure shows the location and extent of the LMA stations, denoted by green squares. Also shown in the plot is the lightning activity in small storms to the SW and distant N, and an example of interference from a power line corona source (red line extending northeast). The preferred alternative routes the power line directly through the eastern half of the LMA network, past nine stations along its path and in view of a similar number of the stations located at high altitude around the mountain-top observatory itself.

9. VHF radiation produced by corona from the proposed line(s) will affect the LMA in several ways. It will decrease the overall sensitivity of the network due to increased noise levels, requiring higher threshold values for recording the lightning signals at the individual stations. In addition it will cause the lightning source locations to become spatially noisy as a result of the coronal VHF radiation events being randomly and inevitably incorporated into the arrival time values,

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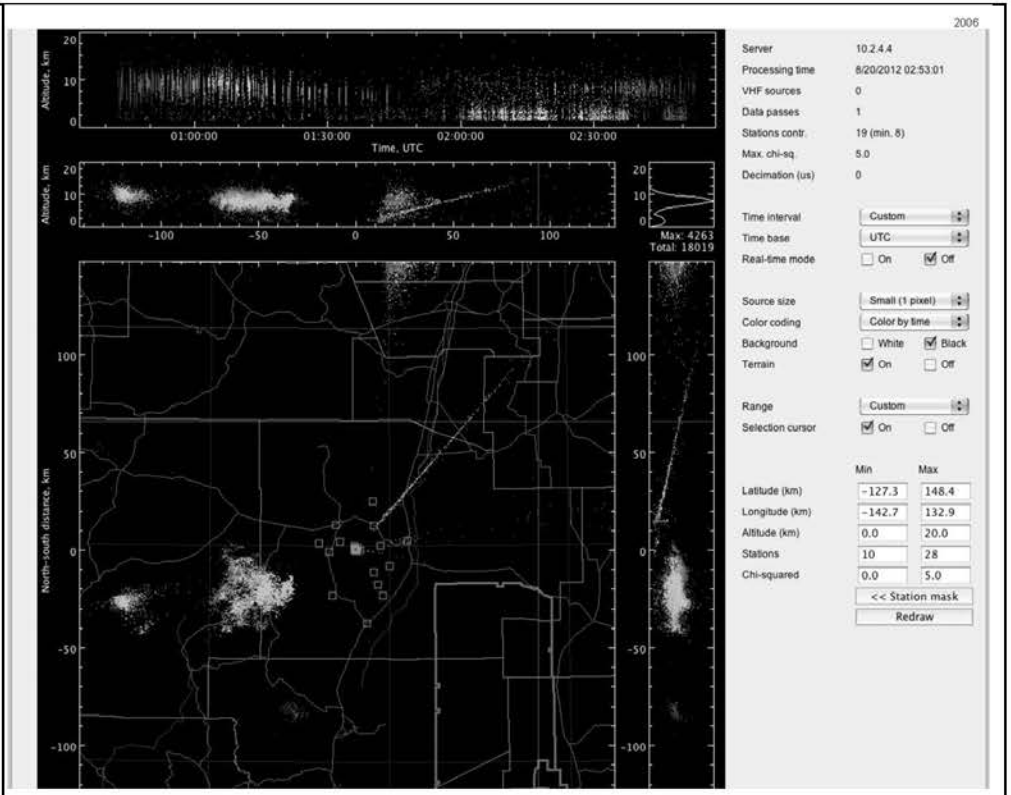
2006



contaminating the resulting lightning source locations. Two types of coronal RF interference would be produced by the lines: that produced by continuous corona from the lines due to their extra high voltage, and that produced by point defects along the line.

10. One reason for the EIS selecting the preferred alternative is that it follows the path of the existing 375 kV transmission line running in a north-south direction on the west side of Polvadera Peak and Socorro Peak (M-Mountain). Further south along the 375 kV line, and on the 115 kV N-S line on the east side of M-Mountain, are two point sources of RF interference that affect the LMA, near where State Highway 107 joins I-25. One such source is caused by a miniscule (possibly microscopic), invisible burr between pylons on one of the phases of the 115 kV line. VHF Radiation from this minor defect is readily located and visible in the LMA data, despite being 35 km south of the main Laboratory area. The other source is a stronger one on the 375 kV line very near to the 107/I-25 intersection; its radiation is sufficienty distributed along the power line that it is not located by the LMA. But it raises the thresholds at close stations by a factor of 100 to 1000 or more, both reducing the network sensitivity and contaminating lightning source locations. Both sources are too weak to constitute significant power losses for the transmission line, but are brightly detected by the sensitive LMA receivers.

11. The interference seen in the figure example is from a corona source on a lower voltage, 7.2 or 14.4 kV local power line, close to Highway 60 and to one of the LMA stations in the northeastern part of the network. VHF Radiation from the defect is readily detected by at least ten LMA stations and produces the outwardly radial red line of sources in the real-time LMA data. Many such sources occur that are like this but are not physically located by the LMA, due to their radiation being spatially spread out along the line and also being noisy time-wise. Nevertheless, these invisible sources contribute to threshold increases and give rise to spatially noisy lightning source locations.

12. Even in the absence of point defects, the extra high 500 kV voltage of the proposed power line will produce constant corona that will result in decreased sensitivity of nearby and even relatively distant stations that view the line. In rain the corona will be even stronger, significantly so, producing a steady RF 'glow' affecting the lightning data in the storms being studied.

13. The addition of up to six EHV lines to the existing 375 kV line will almost certainly be deleterious to the operation of the LMA. The broadband digital interferometer operates in the same frequency range as the LWA networks (20-80 MHz, as well as in the upper VHF band and lower UHF). Its receivers, being fully coherent, are even more sensitive than those of the LMA.

14. Other Langmuir measurements span the full range of frequencies from near DC up into the UHF and microwave range, and are both ground-based and balloon-borne. An important standard set of lightning measurements are the electrostatic and higher frequency components of the electric and magnetic field changes produced by the discharges. Quantitative, accurate measurements of the lightning electrostatic field change are used to infer the locations and amounts of electric charge inside active storms. These measurements and studies have been pioneered by New Mexico Tech researchers since the early 1940s and are continuing as strongly as ever today. The instruments that measure the electrostatic field changes, called 'slow antennas', readily sense the 60 Hz electric fields produced by the power lines. A number of such electric field sensors are operated continuously at and around the Laboratory that have extremely high dynamic ranges, whose data would be substantially affected by the high voltage fields of the proposed lines. A network of such stations called the Lightning Electric Field Array (LEFA) for obtaining lightning and storm charge estimates operates along Highway 60 to the north and south of Highway 60's Sedillo Hill. Like the LMA stations, this network would be directly traversed by

2006

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the power lines and significantly affected by the additonal lines.

15. One reason for the high degree of sensitivity of the LMA and broadband interferometer systems, as well as that of the LWA, has been the conversion to digital television and the resulting decommissioning of distant, high power transmitters in the lower VHF (Channels 2-6; 54-88 MHz), in favor of higher frequency UHF transmitters. While local, low power communications applications will start being used in the freed-up bands, Channels 3 and 4 (60-66 MHz and 66-72 MHz) are to be left unused and free from interference. Channel 3 is the band used by the Langmuir network (and typically by other LMA networks), and has become nicely quiet at Langmuir and the other locations since the digital conversion. Like lightning, radiation from power line corona is broadband and omnipresent over the full range of VHF frequencies. It cannot be filtered out in the LMA measurements and will negate or even reverse some of the gains realized by the digital conversion.

2 16. A comment letter and report submitted separately by Patrick Crane concerning the LWA radio astronomy networks contains the best available data on VHF radiation from defect-free EHV power lines. The conclusion in his letter is that a minimum separation distance of 10 miles should be an initial guideline for the LWA and VLA antennas. We strongly concur with this recommendation as a minimum separation distance from the various instruments and measurement being conducted at and around Langmuir Laboratory.

17. Finally, we note that the EIS does not appear to consider the 2010 report by the NM Task Force on Statewide Electricity Planning. The report takes a comprehensive look at the structure of the overall power grid in New Mexico, and how the grid's future development should be planned and implemented. The report makes reference to an important study by Los Alamos National Laboratory. Among other things, wind-generated power from the rural Corona NM area was proposed to be routed a short distance northward into the existing I-40 power line corridor, and from there into Arizona and points west and northwest. Rather than starting from the narrow view of an essentially dedicated, privately-funded and owned power line between private entities at the two ends of the line, and attempting to thread the needle in the process, as a public institution the BLM has the responsibility to produce an EIS that carefully considers the Task Force recommendations and Los Alamos alternative as well. The stakes and impacts of developing a hodge-podge of transmission lines in New Mexico require a larger statewide perspective to be considered.

Sincerely,

Paul Krehbiel

Paul Krehbiel
Professor of Physics

Letter co-signed by William Winn, Langmuir Laboratory Chair, and by William Rison, Ronald Thomas, and Graydon Aulich, co-developers of the LMA.

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2006	Response to Comment
2	Comment noted.

2022

From: Lee Fike
To: BLM_NM_SunZia_Project
Subject: Comment on the SunZia Transmission Line Project
Date: Tuesday, August 21, 2012 9:02:12 PM

August 21, 2012

Re: SunZia Southwest Transmission Project Draft Environmental Impact Statement (DEIS.)

My wife and I have lived in southern Arizona, Tucson and Oracle, for a combined total of 50 years. I own a small business in Tucson.

I think this transmission line is a bad idea. There will be a terrible environmental cost to this project if it is routed through the San Pedro River Valley or Aravaipa Canyon. These are precious and irreplaceable riparian areas. I am quite familiar with these places, having worked on a ranch in Aravaipa Creek when I was in college and having hiked, bicycled, ridden on horseback, and traveled via motorized vehicles throughout the San Pedro Valley between the Catalinas and the Gailluros for much of my life, and a huge, new transmission line would be a serious insult to these lands. If we, the American People, owners of that land (through the BLM,) charged SunZia what that land is truly worth, then they wouldn't be able to afford it.

1 At the DEIS public meeting in Tucson, held at Palo Verde High School, much was made of the potential for generating renewable energy in New Mexico and Arizona, and the implication was that the purpose of the transmission line is to take this renewable energy and send it to Phoenix and California. However, there is no requirement in the proposal that renewable energy be used.

Even if the transmission line was going to be used for renewable energy, it's still not a good idea. There is plenty of solar energy potential in southern Arizona and in California. It doesn't seem necessary to ship it from New Mexico.

In any case, a distributed system of solar energy collection makes a lot more sense, at least for southern Arizona and California, than this transmission line. We should be working on increasing the local generation of solar energy on rooftops and other urban land, near where it is being used.

2 And if a new transmission line is to be built to carry traditionally-generated power, as seems likely, it should be routed along existing transportation corridors, like the Interstate 10 freeway and other existing public roads. Better yet, build those generating stations near to where the electricity will be used.

2022	Response to Comment
1	Comment noted.
2	Alternative transmission line routes were considered within the I-10 corridor including portions of Subroute 4C3. Generally there is insufficient area available for the proposed right-of-way adjacent to I-10 because of existing development located along the highway, and therefore other potential alternatives following I-10 were eliminated from consideration.

2022

At that same DEIS public meeting we attended in Tucson, there was a widespread sense among the attendees that this whole idea of having "public input" was a sham, a charade. The BLM seemed like it was working hand-in-glove with SunZia, and we had the impression that the BLM had even paid for some of the consultants present that were promoting the idea. It seemed that its offering the public a chance to have input was merely pro forma. We had the definite impression, from the tone of the presentation, that the decision to build the transmission line along SunZia's favored route, through the wild land of the San Pedro Valley, had already been made. It didn't seem like the BLM was truly interested in any comments the public might have (in the sense of actually amending their plans based on the public's opinions.) Isn't the BLM supposed to be working for the American people and managing the land in our best interests? 3

In sum, we are against this misguided used of one of southern Arizona's most precious natural resources, and we are very unhappy with the way the BLM has managed what it claims are opportunities for "the public…to participate in the BLM's decision-making process." (Jesse Juen's letter to Peter Else, August 16th, 2012.)

Yours sincerely,

Lee and Nadia Fike

1726 N. Cloverland Avenue

Tucson, AZ 85712

lee@leefike.com

2022	Response to Comment
3	The DEIS was made available for public review and comment on May 25, 2012. The BLM held ten public meetings and scheduled a 90-day public comment period that ended on August 22, 2012. In total, the public scoping for the SunZia project has included a total of 22 public meetings and 255 days of public comment. A 45-day public comment period is generally the time provided for a DEIS. The BLM's planning regulations and guidance require a minimum 90-day public comment period for land use plan amendments. The SunZia project may involve several BLM land use plan amendments thus the 90-day comment period was provided. The SunZia DEIS comment period meets BLM requirements and affords interested parties opportunity and time to review the document and submit substantive comments. In addition, the BLM regulations implementing the National Environmental Policy Act regulations require that all substantive comments received before reaching a decision must be considered to the extent feasible. This means that substantive comments received after the 90 day comment period have also been considered before the Final EIS was issued.

2070

From: Maria Vicens and David Russian
To: BLM_NM_SunZia_Project
Subject: We oppose the SunZia project in the San Pedro River Valley
Date: Friday, August 17, 2012 12:48:47 PM

Dear Sir/Madame,

We are a family who are landowners in the San Pedro River Valley. We love this special place and our time there is magical. As you know, this is an area with unique wilderness, wildlife, and archaeological features. The SunZia project would permanently damage the valley. The project as a whole is problematic. Running lines which would harm a unique area in opposition to its residents is wrong.

The route through the valley is in opposition to several other government agencies and many archaeologic and conservation groups. Other routes are available which would not cause as much damage. If the project must move forward, please choose another route.

1 The motivations for the proposed route are clearly political, including the choice of a route through a sparsely populated valley with less of a voice. There are other routes which could run in previously established industrial corridors. These would be cheaper to build and maintain in comparison to running lines through remote and rugged wilderness

2 The economic viability of the project is very doubtful. The project is dependent on government subsidy. The initial intent of the project was to carry wind-generated electricity, but now it is apparently to transport gas generated power from a plant which has not yet been built. Energy Capital Partners initially was to invest in the project but they have withdrawn. There is no clear customer for the power. California and Arizona both has given appropriate emphasis on local generated power. Finally, the project would compete with and in some ways is redundant to the Southline SunZia project, decreasing the chance for success of both.

The ROI for the project is at best tenuous. The overall success of the TARP program is contentious, but clearly the expectations have not been met with other much better intentioned use of taxpayers money than this flawed project. Why are you insisting on this risky and controversial investment of taxpayer resources?

As a taxpayer, I am outraged that my money is being used to directly harm me, degrade a special valley with unique wilderness, archaeological, and wildlife resources. The business plan is weak, motivated by the politics of sustainable energy which are antiquated
and no longer apply. It sheds a bad light on the decision making of the stewards of all of our resources-- financial and others. I can think of many other better projects for the government to invest in which would be more likely to be economically viable, create jobs, and not harm our limited natural resources. You can too. Please do not run the SunZia lines through the San Pedro River Valley.

Sincerely,

David Russian, M.D.

2070	Response to Comment
1	Alternatives through existing industrial corridors were analyzed in the DEIS including Subroute 4C3.
2	The proposed action does not require a cost outlay by the federal government. As provided in the Memorandum of Understanding between the SunZia Southwest Transmission Project's Applicant (SunZia Transmission, LLC) and the BLM, it is the Applicant's responsibility to reimburse the federal government for expenses to process the right-of-way application under a cost recovery agreement. Financing by the federal government is not a condition of the Proposed Action.

2071

[redacted]

[redacted]
Received vial BLM website Aug 17, 2012

I have attached my comment form for the SunZia project, deadline Aug.
22,2012
Marian P Day
2071

I would like to address the issue of the crossing between Bosque del Apache NWR and Gordon Ladd complex, My concerns coincide with thoes of the Friends of the Bosque del Apache and Audubon NM. Route Determination

1 As stated in our comments during previous scoping periods, we oppose any route with an aerial crossing of the Rio Grande between Bosque del Apache National Wildlife Refuge and Ladd S. Gordon Waterfowl Complex, in particular the San Antonio crossings identified as the 1B subroutes and the current BLM preferred alternative. We disagree with the elimination of alternative routes that may minimize impacts on biological resources, in particular migratory birds. The WSMR Routes 1, 1a, and the unnamed route west of the Sierra Ladrones WSA and Sevilleta NWR were eliminated because they were deemed incompatible with management policies or plans. Likewise routes with a southern crossing, including 1C1, 1C2, 1C3, 2A, and 2B, were eliminated because the Department of the Army indicated that they would compromise their mission, and rights-of-way could not be granted without significant and economically infeasible mitigation measures. However, wildlife experts, including representatives of the Cooperating Agencies, have indicated that a river crossing in the vicinity of Belen or south of Elephant Butte would have less of an impact on migratory bird populations. Eliminating those routes prior to full evaluation and scoping presented unfair bias for the landowners involved and leaves too many questions as to the feasibility of those routes for meeting multiple needs of the stakeholders.

Biological Resources

2 The Analysis of Potential Avian Collisions with Transmission Lines at Four Locations on the Rio Grande in New Mexico cited in the EIS presented only a snapshot of bird use in the corridor. Sixty-four surveys, or approximately 32 site-days, at the San Antonio North site is a poor sample size to try to quantify effects on a susceptible population such as the Rocky Mountain Population (RMP) sandhill cranes, especially given that some of the sampling period fell prior to their arrival in the region. The variability in the counts per hour and flight height between the San Antonio North and South sites makes predictions for the preferred route, which was not studied, impossible. Data from the San Antonio North site for the August to December 2010 period indicate an average flight height of 47.97 meters, or roughly 157 feet. This flight level is within the proposed range of tower heights, 100'-175', and slightly above the mean height of 135'. Given that cranes are especially susceptible to collisions rising from or descending to feeding or roosting areas, their daily movements between Bosque del Apache NWR and the Ladd Complex will put them in constant danger.

2071	Response to Comment
1	Both alternatives were studied. A route (WSMR Route 1/1A) that would cross north of the Sevilleta NWR and then turn south west of the Sevilleta NWR was eliminated primarily because of other restrictive land designations on BLM land west of the Sevilleta NWR, such as ROW exclusion areas, and would not be compatible with Cibola National Forest land management policies (DEIS Section 2.3.3.1, pg. 2-29). As stated in the comment, an alternative that would follow the western edge of the WSMR (east of the Bosque del Apache NWR), was eliminated because congressional approval would be required to release BLM's Antelope WSA in order to allow a utility right-of-way.
2	Variation in flight patterns between survey locations is expected, and the range in the survey results is reasonable. Approximately 3 times as many birds per hour were observed at the San Antonio South survey location, primarily resulting from a large difference in the number of Red-winged Blackbirds (approximately 4 per hour at San Antonio North, and 31 per hour at San Antonio South). Numbers of Sandhill Cranes and their flight heights were relatively similar between the North and South survey locations. Each of these survey locations was within a wider floodplain than the BLM preferred alternative, with greater amounts of farmland and riparian habitat present. As discussed in section 4.6.5.2, "The north river crossing location (subroutes 1A and 1A1) is located approximately 12 miles north of the San Antonio river crossing location (subroutes 1B1, 1B2, 1B2a, and 1B3). When compared to the San Antonio crossing, the floodplain is narrower at the north crossing with lower amounts of farmland and riparian woodland used by foraging Sandhill Cranes, waterfowl, and other migratory birds. However, this could serve to constrain bird flight to a narrower corridor. The north river crossing location is also farther from important night roosts than the San Antonio crossing, possibly reducing daily use by cranes and waterfowl. The avian collision risk study estimated that, while collisions would occur, effects at the population level are not expected."

2071

2 The variability in flight data between the two sampling periods brings the fatal collision estimates into question. The fact that cranes are exposed to other threats, including multiple power lines, throughout their distribution, should not be used as justification to add to their challenges. Energetically, winter is a difficult time for these birds, and safe movement up and down the Valley is a key component in maintaining body condition and preparing for upcoming life cycle requirements. As stated by Rod Drewein, the Middle Rio Grande Valley is the most important landscape in the annual life cycle of the RMP cranes. This fact alone should elevate the required level of research and analysis of any proposed landscape modification in the Valley.

Cranes are of concern, but impacts aren't restricted to that species. All birds and bats must be protected. If there are conflicts between lowering towers to reduce crane collisions and raising towers to prevent habitat disturbance that would affect Southwestern willow flycatchers, then more research is warranted and the route needs to be relocated to other sites determined to be of less impact on all avifauna. Bird diverters are an oversimplified solution to a much greater placement issue.

Land Use

3 More than 500 acres of conservation easements are in development or have been completed along the floodplain between Bosque del Apache NWR and Bernardo, the details of which have been given to SunZia by the Rio Grande Agricultural Land Trust. The EIS Section 4.17.3.2 indicates that conservation easements are covered in Section 3.10 under the past and present activities and land uses within the study area, but there is no mention of any conservation easements in our region. These special land designations and restrictions are a glaring omission in the route analysis and must be fully evaluated and presented to the public, as well as the parties involved, before any routes are determined. Conservation easements take years of planning and implementation, but they are becoming a critical tool in restoration and preservation of our vulnerable habitats. Furthermore they promote collaboration between private landowners and non-profits or governmental entities for greater conservation goals. Diminishing the purpose and relevancy of these easements by crossing or otherwise impacting them would set back the progress that has been made in the Middle Rio Grande Valley.

Visual Resources

4 The visual impact of these power lines has been greatly underestimated. In an area where miles of the Rio Grande Valley are visible from I-25, as well as the myriad access roads to residences and recreation areas, these lines will be a steel wound bisecting our lush corridor and our community. The simulations don't give a full representation of the visibility of these towers, which at 100'-175', are taller than the Rio Grande cottonwoods (average height <90') that comprise the riparian corridor. Stating that the lines "would be partially screened by riparian vegetation" is not only inaccurate, but misleading as the vehicle river crossing is only one vista that will be marred by the presence of the lines. Furthermore, once a new corridor has been established, such as the preferred route northeast of Socorro, the door will be opened for other utilities or transmission lines to follow suit, further fragmenting our habitat and our viewscapes. Trying to quantify such subjective qualities as scenery and view belittles the value of the landscape to the people that call the area home and the thousands who visit each year to drive and bike our scenic byways, hike our backcountry, and photograph our sandhill cranes and snow geese as they fly down river at sunset over golden cottonwoods set against the stratified hills.

2071	Response to Comment
3	A discussion regarding conservation easements has been added to Section 4.10 of the FEIS.
4	For the DEIS, simulation locations were selected to show a range of impacts to viewing locations including residences, recreation areas, and travel routes throughout the study area. The DEIS discloses impacts to viewers including residences, recreation areas, and travel routes, in particular high impacts have been identified for recreation users of the Rio Grande river crossing (Link E180), as stated in Section 4.9.3.1 and as illustrated on Map 9-2E of the DEIS. Also the river crossing was identified as Class A high scenic quality, which would result in a moderate-high impact for the Project. The statement that the project would be partially screened by vegetation is an accurate statement as demonstrated by the simulation. Clearing would occur at the crossing; however, due to existing vegetation that surrounds the project crossing the lower portion of the transmission line would be screened from this KOP (viewpoint for simulation).

2071

Environmental Justice and Economic Conditions

5 Environmental justice populations characterize Socorro County, and the fact that the density of those populations in immediate proximity to the power lines is low, doesn't mean that the entire county is not affected. From the small family farms struggling to maintain in multiple seasons of drought, to the small businesses seeking to build a tourism-based economy around outdoor recreation, our community is intertwined, and the ripple effect of this project will be widespread. Socorro County may not have a land use plan to reference, but the mission of the County to protect its trust resources and serve its people warrants consideration; however, the EIS has considered the needs of all other stakeholders first in the determination of alternative routes. It cannot be said that jobs for construction and operation of the transmission lines will directly benefit Socorro County, but it can be proven, as evidenced by the turnout at the public meetings, that the citizens are opposed to the lines in this area. Socorro County is being run over by this all-loss and no-gain project.

Whether it is threats to biological resources, compromises to restoration projects and conservation easements, or scars across the community, there are elements of this proposal that remain under-evaluated and stakeholders that remain underrepresented. This project cannot and should not be pushed through as proposed with the preferred alternative route or any San Antonio crossing. To plagiarize the conclusion of the WSMR regarding impacts of alternate routes through their lands, the BLM preferred alternative route north of Socorro or San Antonio crossings would cause "adverse effects that could not be economically mitigated."

2071	Response to Comment
5	Comment noted.

2084

Marshall Magruder
PO Box 1267
Tubac, Arizona 85646

2012 AUG 27 PM 1:05

22 August 2012

Bureau of Land Management
SunZia Southwest Transmission Project
PO Box 27115
Santa Fe, New Mexico, 87508-0115

Subject: Review Comments on the Draft Environmental Impact Statement and Resource Plan Amendments for the SunZia Transmission Project

References:

(a) Draft Environmental Impact Statement and Resource Management Plan Amendments for the SunZia Transmission Project (DES 12-26) of May 2012 (BLM/NM/PL-12-07-1793)

(b) US Department of Interior, Bureau of Land Management, New Mexico State Office, letter of 11 May 2012

(c) *Federal Register, Vol. 77, No. 103*, Tuesday, 29 May 2012 pp. 31637-31640, Notice of Availability of Draft Environmental Impact Statement for the SunZia Southwest 500 kV Transmission Line Project in New Mexico and Arizona, and Prospective Draft Land Use Amendments.

Attachments:

(1) Marshall Magruder, "Scoping Comments on the Southline Transmission Line Project (DOE/EIS-0474)" of 4 June 2012.

(2) Bonneville Power Administration, "Living and Working Safely Around High-Voltage Power Lines", available at www.transmission.bpa.gov/LanCom/Real_Property.cfm

1. **Summary.**

This letter contains Review Comments on the Draft Environmental Impact Statement and Resource Plan Amendments (Draft EIS) for the SunZia Transmission Project reference (a) in response to references (b) and (c) due 22 August 2012 submitted by Marshall Magruder.

He was appointed to the Joint Santa Cruz County (Arizona) – City of Nogales Energy Commission in 2000, initially elected as the Vice-Chairman and served as the Energy Commission until 2008. He has been active as an intervener in several Arizona Power Plant and Transmission Line Sting Cases, nominated to be a member of this Committee, participated as an intervener in electricity, natural gas, water and wastewater rate cases before the Corporation Commission and served on Congresswoman Gifford's Solar Energy Task Force, and coordinated and managed the First Santa Cruz County Solar EXPO.

1 There are serious issues with this project because of cumulative actions with other related

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1	Comment noted.

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transmission projects for "renewable" energy transmission from wind sources in eastern New Mexico and potential solar resources in both states. Competing and duplicative, and somewhat redundant, projects are now before the New Mexico BLM Office that must be compared in order to efficiency use resources including taxpayer's funding for federal projects sponsored by the Western Area Power Administration. Further, four of the five proposed SunZia routes in Arizona are new corridors through valleys with critical environmental impacts to the agriculture and astronomy industries and, most importantly, to the rural character and quality of life for those presently living there. A fifth Arizona route is through Tucson along existing corridors.

1 The SunZia Project presently proposes TWO sets of structures. No rationale given why one tower set with double-circuits cannot be used with significantly narrower rights of way, less environmental impacts at significantly lest cost.

Serious consideration must be included in the EIS, as a minimum, as an Alternative, to use modern Aluminum Conductor Composite Reinforced (ACCR) conductors that are lighter, smaller and stronger requiring less infrastructure at lower costs described in Enclosure 3 to Attachment 1 of these comments.

Direct Current (DC) only transmission was not considered an Alternative. Most renewable sources initially generate DC electricity, thus losses of conversion can be eliminated.

A single ROW with two circuits on one row of towers MUST be an Alternative considered, as it is very doubtful if TWO parallel ROWs will meet the approval of BLM or state siting authorities. The project must be redesigned for a single ROW.

It appears a subliminal project objective is to interconnect a proposed Bowie generation plant to the grid. However, that plant is not in the best site with respect to existing transmission and natural gas infrastructures. IF the Bowie plant was sited with the Apache plant, then a systematic transition from coal to natural gas generation could occur with less total new infrastructure requirements including possible elimination of an expensive substation.

2. **Organization of these Comments**.

These comments consist of a cover letter, two sections and attachments.

2 This cover letter addressed serious environmental, systemic, and programmatic substantive issues that require action to remove prior to issuance of a Final EIS. Mitigation, a process used when solutions to issues are not found, may have to be required in the Final EIS and enforced in language found in the Records of Decision issued by federal land managers. Also Arizona and New Mexico line siting statutes and processes may require additional changes or mitigation actions to meet the requires for siting the Project on state and private land. This cover letter includes discussion concerning

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1	The proposed Project is to construct two 500 kV transmission lines within a single right-of-way, including one AC circuit and a second circuit that could be (optionally) either AC or DC. Alternative transmission technologies were evaluated and described in Section 2.3.3.2 of the DEIS, including a DC (only) option and double-circuit structures; these alternatives were considered and eliminated for the reasons stated within this section of the DEIS.
2	Comment noted.

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Paragraph 3 contains a discussion concerning the "need" or requirements for the SunZia Transmission Project. This is the most critical issue or concern about this project because the SunZia approach is not the only one readily available. Other Alternatives appear to be superior in various aspects. Until compared as an Alternative in a Supplemental "Combined" EIS provided and reviewed in according the NEPA public review processes for a SEIS, then the Final EIS should not be completed. See Section 1 below.

Paragraph 4 and, as expanded in Sections 1 and 2 below, contains a summary of additional issues that need resolution prior to the Final EIS.

a. Cumulative Actions of the SunZia Project with Competing Transmission Projects.
b. Renewable Energy Credits (RECs) Account for Renewable Energy Source.
c. Critical and Unintended Deficiencies and Environmental Impacts Caused by Cumulative Actions with
   Table 1 – Comparison of Capabilities and Characteristics of the SunZia, Centennial West and Southline Transmission Projects
d. Benefits of Direct Current (DC) versus Alternative Current (AC) Transmission.
e. Impacts of the Western, Eastern and Texas Grid Interconnection.
f. Safety Impacts of Inducted Current in Parallel Structures.
g. Public Review and Political Pressures Applied by SunZia proponent.

Paragraph 5 is a summary list of major Deficiencies in the Draft EIS. Paragraphs 6 and 7 are Conclusions and Recommendations in these Comments.

These issues and deficiencies are discussed in greater detail in two Sections that follow.

Section 1 – Areas of Significant Environmental Impacts NOT addressed in the DRAFT EIS.
Section 2 – Significant Comments, Conclusions and Recommendations in the DRAFT EIS

The referenced Attachments listed above are after Section 2 herein.

3. **Lack of NEED or Requirements for the SunZia Project (Most Critical Deficiency)**.

3 A review of Reference (a) shows serious and critical gaps of critical information necessary to establish the "need" or requirements for this project, especially in light of other proposed projects that will accomplish the same goals. Without comparison of the cumulative transmission requirements and conduct of the essential trade-off studies, then isolated project evaluation will be suboptimal and not provide the best solution. The BLM *NEPA Handbook*, in section 6.2, directs that even an EA "... shall include brief discussion for the need for the proposal..." and that "the purpose and need statement as whole describes the problem or opportunity to which the BLM is responding and what the BLM hopes to accomplish by the action."[1]

It is critical to note that Arizona Revised Statutes (A.R.S.) ¶40-360.06 mandates that the

[1] *BLM NEPA Handbook H-1790-1*, section 6.2, p. 35.

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3	The "requirements or needs" for the Project is included in the statement of the Applicant's objectives as provided in Section 1.4 of the DEIS.

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3 project *need* is essential decision criteria for siting a project. The "need" for the proposed project (not the need for a ROD) will has to be provided to the Arizona Power Plant and Transmission Line Siting Committee, with more than the speculative assumptions from this Draft EIS based on required renewable energy portfolio standards for various states. Fifty Percent of Arizona's renewable energy requirements are from local distributed generation. In general, local distribution generation does NOT require transmission lines.

The Draft EIS indicates that the "need" is for the federal government decision makers to "decide" about the actions that result from the project. This is the NEPA documentation requirement for an EIS but this is not the "projects" requirements or needs.

4. **Summary of Issues and Major Concerns with the SunZia Project.**

a. **Cumulative Actions of the SunZia Project with Competing Transmission Projects.**

4 This issue concerns *deficiencies* due to the cumulative actions of the SunZia Transmission Project when compared to other viable, parallel and competing transmission projects that are under the same BLM New Mexico Office as the Lead Agency for accomplishment of the NEPA process. The "total cumulative" impacts of all these projects must be considered at one time and not on an independent project-by-project basis, as all will connect to only ONE transmission grid. Each transmission project will have both direct and indirect impacts on the other transmission projects and may also have unintended consequences in other parts of the environmental spectrum, including significant cumulative impacts on electricity transmission, natural and human effects.

5 The excessive duplication in these projects, adds needlessly cost and resulting in additional environmental impacts. The SunZia Transmission Project duplicates or is redundant to existing and proposed transmission lines and elements of the following, among others, ongoing transmission projects under development and in stages of the NEPA processes being created, developed, and evaluated in the same BLM NM Office. These include at least three very similar projects, all with competing goals. The first two are discussed later in Table 1.

(1) Western Area Power Administration's ***Southline Transmission Project.***
(2) Western Area Power Administration's ***Centennial West Clean Line Project***.
(3) The ***Tres Amigas*** AC/DC/AC Interconnection transformation station to unite national transmission between the Eastern Interconnection, Western Interconnection (WECC) and to ERCOT Interconnection (e.g., Texas east of El Paso) for renewable electricity in New Mexico and West Texas to any of the three interconnections. Tres Amigas will use superconducting high voltage DC (HVDC) during this process with initial interconnections completed in 2016.[2]

These and other projects being developed meet the definition of a "cumulative action". The *BLM NEPA Handbook* defines cumulative actions as

[2] See "North American Strategic Infrastructure Leadership Forum, 12 October 2011 slides at http://tresamigasllc.com/presentations-files.php

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4	The total cumulative impacts of all other viable projects on the transmission grid cannot be estimated because they are unknown; and all other projects would not be likely to be developed in the reasonably foreseeable future.
5	The cumulative environmental impacts of the proposed Southline Transmission Project were evaluated in the Section 4.17.3.2 of the DEIS. The Centennial West Clean Line and Tres Amigas projects were not included because they would not be located within the cumulative analysis area.

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"...*proposed actions, when viewed with the proposed action,* potentially have *cumulative significant impacts related to one or more identified issues. Cumulative actions "should be discussed" in the same NEPA document (40 CFR 1508.25(a)(2)"*[3]. [Emphasis added]

6 In the case of these three projects, all intend to use similar renewable energy sources in the same general area, in particular wind sources from Eastern New Mexico and solar sources in both Arizona and New Mexico. All three of these projects are neither necessary nor required to provide transmission services to meet the expected load; however, all renewable energy derived electricity that reaches the "grid" will usually be sold with a Renewable Energy Credit (REC) tag.

Also the *BLM NEPA Handbook* on page 45 states:

"If the connected action is also a proposed BLM action, we recommend that you include both actions as aspects of a broader "proposal" (40 CFR 1509.23), analyzed in a single NEPA document."

As also stated in the *BLM NEPA Handbook* on page 45 we read:

"If the connected action is proposed by another Federal agency [Ed. such as DOE or FERC?], *you may include both actions as aspects of a broader proposal in a single NEPA document... Evaluate whether a single NEPA document would improved the quality of analysis and efficiency of the NEPA process, and provide a stronger bases for decision making."*

And in *BLM NEPA Handbook* (page 46) reads:

"If you do not include the connected action with the proposed action as aspects of a broader proposal analyzed in a single NEPA document, you much, as a minimum, demonstrate that you have considered the connected action in the NEPA document for the proposed action (40 CFR 1508.25). (i.e., describe the connected action and its relationship to the proposed action, including the extent to which the connected action and its effects can be prevented or modified by BLM decision-making on the proposed action.) In this cased, a separate NEPA document would need to be prepared for the connected action. It would be useful to incorporate by reference portions of the NEPA document complete for the connected action, if available, into the NEPA document for the proposed action."

7 Conclusion. That additional analysis of the other ongoing NEPA processes that involve the same renewable energy sources and transmission must coordinated into a single document for the decision maker, in this case, the lead decision-maker is the BLM New Mexico Office for the "connected action" projects.

Recommendation. That a Supplemental EIS be developed that considers each of these projects as Alternatives so that the BLM and other decision-makers can evaluate the direct,

[3] *BLM NEPA Handbook H-1790-1*, Glossary, page 130.

2084	Response to Comment
6	As stated in response to Comment no. 5, the Clean Line and Tres Amigas projects are not in the same "general area" as the SunZia Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, is not a connected action and is not an alternative to the SunZia Project; the Purpose & Need for the Southline project is different than that of the SunZia Project.
7	Please see responses to Comment nos. 5 and 6.

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indirect and cumulative impacts of each alone or in various combinations so that the best long-term and final decision can be make.

b. **Renewable Energy Credits (RECs) Account for the Renewable Energy Source.**

8 Most estimates in this DRAFT EIS assume ALL renewable energy will be transported on High Voltage transmission lines. In fact, distribution lines are completely adequate for all but the largest, above 100 MW, generation sources. Removal of all projects with less than 100 MW from in Table 4-30 (Past, Present, Future, and Reasonably Foreseeable Future Activities within Cumulative Area of Analysis) of the DRAFT EIS (pages 4-266) and from Table 4-31 (Past, Present, Future, and Reasonably Foreseeable Future Project) (pages 4-267 to 4-268), will show much less potential demand or "need" for high voltage transmission lines.

It is also noted, but omitted in the DRAFT EIS, that these renewable electricity credits (RECs) are sold when RE generated electricity gets to the grid. A "direct" path from New Mexico is not required for those in California to purchase RECs. This means RECs from NM can add MWs to the Grid and others, a thousand miles away, can use RECs to purchase the NW generated MWs. Electricity itself is the same no matter what the source of generation.

Therefore, direct linear transmission interconnections are not required to move RECs from NM/AZ to CA, as requested in this SunZia DRAFT EIS.

c. **Critical and Unintended Deficiencies and Environmental Impacts Caused by Cumulative Actions.**

9 (1) Critical unintended interactive deficiencies, including Native American impacts represented by the Tohono O'odham, Apache, Hopi, and Navajo Nations in Arizona and other sovereign nations and tribes in New Mexico, could lead to denial due to conflicts between the various applications.

10 (2) The above resultant NEPA (EIS) documents are processes are not synchronized. There are overlapping conflicts and glaring omissions between them can easily lead to serious electrical, environmental, and legal difficulties in the future. Resolution of these interactive, cumulative and unintended consequences can only be resolved by simultaneously reviewing these projects, from a systemic and programmatic view, as they are not isolated, independent projects.

(3) Resolution of these transmission line issue are more than just changes as this Final EIS as this DRAFT EIS must be changed to make such comparisons as Alternatives.

(4) In addition, coordination of all three of these Projects with the transmission line siting processes in New Mexico and Arizona needs to be completed in parallel or just after the time the Record of Decision(s) are published in the *Federal Register*.

Table 1 below compares these three competing projects.

2084	Response to Comment
8	Comment noted.
9	Please see responses to Comment nos. 5 and 6.
10	The NEPA process for each of these projects is conducted independently, although cumulative impacts for each of the projects located within the same cumulative analysis area are addressed in each corresponding NEPA document.

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Table 1 – Comparison of the SunZia, Centennial West and Southline Transmission Projects Capabilities and Characteristics.

Capability or Characteristic	SunZia[4]	Centennial West[5]	Southline[6]
Maximum capacity	3,000 MW (AC only) to 4,500 (AC+DC) MW	3,500 MW (For 4,375 MW of wind power)	1,000 to 1,500 MW
Nominal Line Voltages	500 kV (AC) 500 kV (AC or DC)	±600 kV (DC)	230 kV (AC) 345 kV (AC)
Number of Circuits	2	1	2
Number of conductors	5 or 6	2 (each with 3 or 4 subconductor bundles)	3 or 6
Number of towers	2 parallel rows of towers	1 row of towers	1 row of towers
Tower heights	100 to 175 feet 135 feet (typical)	100 to 180 feet 130 feet (typical)	90-170 feet (345 kV) 90-130 feet (230 kV)
ROW Width	400 to 1000+ Feet (165-ft narrow/ckt)	150 to 300 feet 200 feet (typical)	150 (230 kV) to 200 (345 kV) feet
Typical Span	1,200 to 1,600 feet	800 to 1,400 feet	800 to 1,500 feet
Length	460 to 542 miles	878 to 919 miles	240 miles-345 kV and 120 miles-230 kV
Miles of New Transmission Line	530 miles	106 to 288 miles	117 miles
Miles of Existing Lines or Corridors	220 miles	590 to 813 miles	123 miles
Ratio of New miles to Total length	220/530 (Preferred Alternative) = ~42%	106/813 to 288/590 = 12% to 30%	117/240 = 49%
Number of substations	Up to 3 new substations	2 terminals (AC/DC/AC conversion stations)	10+ substations (Existing and new)
Terminal Points (East to West)	SunZia East, Lincoln County, NM to Pinal Central, Pinal County AZ	Santa Rosa, Guadalupe County, NM direct to Mira Loma, San Bernardino County, CA	Las Cruces, NM via Apache substation (Willcox, AZ) to Saguaro, AZ.
Project Status	Draft EIS review	Scoping in 2013	Scoping nearly Complete
Initial Operational Capability Date	2016 (1st AC line) ~2018 (2nd AC/DC line)	Early 2019	Early 2016
Estimated Cost	$1.5 B	$2.5 to $2.6B	$550 M
Lead Agency	BLM New Mexico	BLM New Mexico	BLM New Mexico
Project Website	www.blm.gov/nm/sunzia	www.centennialwestcleanline.com	www.blm.gov/nm/southline

[4] See www.blm.gov/nm/sunzia, for SunZia information, included the DRAFT EIS.
[5] See www.centennialwestcleanline.com, Centennial West Clean Line Project "Standard Form 299 – Application for Transportation and Utility Systems and Facilities on Federal Lands", January 2011.
[6] See www.blm/gov.nm/southline, "Southline Transmission Line Project" April 2012.

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	See following page(s)

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d. **Benefits of Direct Current (DC) versus Alternative Current (AC) Transmission.**

11

There are many benefits to use DC for transmission that need to be considered and included. The differences between DC and AC have significantly different environmental impacts. A combination two-circuit AC + DC on one set of towers is the only viable option that could meet approval of the federal and state siting authorities. Two ROWs is not realistic in today's environment. Some environmental impacts for DC transmission include:

(1) No Electromagnetic Field (EMF) radiation that is associated with AC currents.
(2) Narrower right of ways since a critical factor for ROW width is amount of EMF radiation at the edge of the ROW.
(3) A smaller footprint and environmental impacts.
(4) More efficient transmission with less line energy lost to transport electricity.
(5) Higher reliability due to controlling flow that enhances system stability.
(6) Two instead of three conductors with resultant fewer or smaller transmission towers required for the project, thus having cost savings.
(7) Most renewable energy generates electricity initially is DC, then conversion to AC can occur later in the process.

There are associated costs with DC when used for transmission that include:

(1) End point to end point transmission, which means, one cannot "tap" a DC line with substations, a complementary benefit of Southline Project AC transmission lines.
(2) The utility industry is less familiar with DC than AC transmission and assumes such the risk of failure will be higher with DC than using the familiar AC processes and equipment.
(3) Conversion from DC to AC requires frequency synchronization in order to interconnect with the grid.

e. **Impacts of the Western, Eastern and Texas Grid Interconnections and Tres Amigas.**

12

The Tres Amigas Project is not a transmission line project but a major AC to DC to AC conversion project. Both the SunZia and Centennial West Transmission Projects include DC components. Further, wind and solar generation are usually generated in DC and then converted later to AC with some losses due to conversion. It is feasible to avoid the initial conversion from AC to DC and use DC to the end terminal of the transmission line when it is then converted to AC for distribution.

The Tres Amigas Project is a new development with significant but understandable technological challenges; however, it will be the only location that will be able to transfer electricity from the three Interconnection Grids in our country. The critical Tres Amigas DC components are necessary because each of the three Interconnections (Western, Eastern, Texas) operate on their own AC frequency synchronization schedules.

2084	Response to Comment
11	Please see response to Comment no. 1.
12	Comment noted.

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f. Comments on the Proposed SunZia Transmission Routes in Arizona.

13 The Comments below discuss the primary proposed routes in Arizona, in particular transmission routes in the vicinity of the proposed Willow substation and the eight major paths from Willow to the Pinal Central end terminal substation. The "preferred" BLM ALTERNATIVE Route 4C2 is NOT acceptable to this party and it also is NOT acceptable to the SunZia Transmission Project proponent for the reasons given the SunZia's Comment No. 1 to the DRAFT EIS.[7]

(1) Transmission Prior to Vicinity of the Willow Substation.

14 As proposed in my Scoping comments to the Southern Transmission project, found in Attachment 1 below, by upgrading and, over time, decommissioning, the existing Willcox coal-fueled generation station by the proposed Bowie natural gas transmission plant should be less costly, will have easier access to existing utility electric and natural gas transmission corridors. This will obviously require changes in the proposed alternatives before the proposed Willow substation. In fact, Willow would also be co-located with the Willcox and Bowie generation plants.

(2) Transmission Prior to the Vicinity of the Willow Substation in Route Group Four.

15 Avoidance of the Ft. Huachuca Electric Proving Ground is essential to meet the needs and requirements of approximately the 11,000 soldiers now stationed at that fort. This for is the largest "business" with the most jobs in southern Arizona. Providing safety considerations and avoiding environmental and agricultural damage to the San Pedro Valley will eliminate four of these routes.

Subroute 4A, North of Mt. Graham, is easily rejected to the impacts on observatories and wildlife as primary reasons and was not selected by BLM or the Project proponent.

Subroute 4B, Sulphur Springs Valley, was proposed by the Project proponent for the valid rationale in its letter that is not repeated herein. This party agrees with the proponents letter, and if this line is constructed, then Subroute 4B appears to be the second best Alternative only if Route 4C3 cannot be used.

Subroutes 4C1, 4C2, 4C2a, 4C2b, East and West San Pedro Valley, are NOT appropriate and, for the reasons and rationale expressed by the SunZia proponent, NONE of these San Pedro Valley routes should be considered. Further consideration of San Pedro Valley routes should be dismissed. There should be no further consideration of the BLM "Preferred Alternative" 4C2b.

Subroute 4C3, Tucson, will primarily use existing transmission line corridors and might be considered to interconnect with Tucson Electric Power (TEP) to provide necessary power to

[7] See SunZia letter, "SunZia Southwest Transmission Project's First Comment Letter on the SunZia Draft EIS, issued May 25, 2012, regarding Rate Group 4".

2084	Response to Comment
13	Comment noted.
14	The Willow-500 kV Substation is part of the proposed action for the SunZia Project. The Bowie Power Station site is located approximately 14 miles from the TEP 345 kV transmission line corridor, and permits have been issued for a separate 345 kV transmission line to allow interconnection between the Bowie Power Station and the existing TEP transmission system at the Willow 345 kV substation.
15	Comment noted. Also note that no potential impacts on observatories have been identified for any of the Project alternatives, including Subroute 4A. Subroute 4C3 would have the greatest potential impact on the Electronic Proving Ground.

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15 makeup for the 'sink' conditions that exist near peak load conditions. Further, used of electricity generated by potential renewable energy sources is preferred to the large coal-fueled Sundt Generation Station used by TEP. This is my **PREFERRED ALTERNATIVE** due to significantly reduced total environmental impacts. There is a choice along Subroute 4C3 between the F8 and F11 segments. The F8 segment is preferred when compared to the F11 due to the present transmission corridor when compared to F8.

h. **Safety Considerations due to Induced Electric Currents Must Be In the Final EIS.**

16 The safety considerations due other structures near transmission lines is critical as discussed in Attachment B, *Living and Working Safely Around High-Voltage Power Lines*, issued by the Bonneville Power Administration. Every issue discussed in the Attachment is involved in this project. The "safe practices" include various uses of rights of way; avoidance of shock hazards in moving vehicles; by induced currents along ungrounded water irrigation systems; underground pipes, telephone, TV and electric cables; wire and electric fences; buildings near the ROW. Schools, hospitals and similar facilities must be considered when siting transmission lines.

17 All the issues in Attachment B need to be included in the Final or a Supplemental EIS.

h. **Public Review and Political Pressures Applied on Decision Makers by SunZia.**

Last year SunZia representatives initiated a political fiasco in the Arizona legislature to avoid the statutory Arizona line siting process for the detailed siting on private and state land that was to avoid the public process in this state.

18 The Arizona line siting process is a statutory-limited 180-day hearing process that reviews impact areas not including in a Final EIS or in an Application for a Certification of Environmental Compatibility (CEC). The Final EIS will need to be considered by the Arizona Siting Committee so duplication of efforts is avoided. However, frequently, the EIS and CEC Applications each say the other document pertains when information is not in either. Any resultant "finger-pointing" of responsibilities are resolved in the testimony given before the Arizona Siting Committee. The important requirement is that both the Final EIS and CEC Application recommend same Preferred Alternative for siting on federal lands in the EIS and for state and private lands in the CEC Application.

6. **Summary of Deficiencies in the DRAFT EIS.**

19 Deficiencies in this DRAFT EIS are also described in more detail in Sections 1 and 2.

a. **The Deficiencies below must be corrected before to the Final EIS has been completed.**

(1) Coordinate this project with competing, same timeframe, "connected action" projects under BLM lead agency reviews.

2084	Response to Comment
16	Comment noted.
17	The BPA document entitled Living and Working Safely around High-Voltage Power Lines (Attachment B) is incorporated herewith by reference, and can be accessed on the internet at this site: http://transmission.bpa.gov/lancom/Living_and_Working_Around_High_Voltage_Power_Lines_11-07.pdf
18	Comment noted.
19	Please see responses to commenters "Section 1", below.

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	See following page(s)

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(2) Establish and document a real "need" in terms of specific "requirements" for **this project**, as the NEPA process requirements are not the project's need but are the requirements for federal decision makers.
(3) Reduce the ROW to include less width, preferable by elimination of second "row" of transmission towers.
(4) Develop a single ROW option for this project as it will never obtain TWO parallel ROWs, since its objective can be met with other projects with this project's one ROW.
(5) Interconnect with El Paso and Tucson to meet regional load demands and reduce two-way electricity flow in southern Arizona and New Mexico.
(6) Provide validated economic impact and cost estimation details that are presently erroneous for this project.
(7) Consider and assess the benefits of DC-only for transmission and the benefits of minimal or now EMF radiation, less line (energy) losses, fewer or smaller towers, less conductors, etc.
(8) Consider using current technology ACCR conductors (wires) and their total impact on this project compared to the proposed less-capable ACSR "Lapwing" conductor.
19 (9) Assess how additional Permits described in the EIS could increase the risk or environmental impacts this Project.

b. **Summary of Areas where issues have not been addressed**.

Each issue could have a significant resultant environmental effects involving air, water, land, and living things and economic impacts, as follows that are not included in this Draft EIS. Additional details including questions that should be answered in a Supplemental or Final EIS are also included Section 1 below. Details concerning specific information about "connected" renewable energy sources.

(1) Include local cities, such as Tucson, El Paso, and many Cities in New Mexico as users of electricity generated by the suggested renewable energy sources.
(2) Nonexistent analysis of the reclamation plan of the 400- to 1000-ft Rights of Way after completion of construction. Further, the one ROW option should be considered.
(3) Erroneous analysis on the economic impacts on taxpayers, ratepayers and communities in Arizona and New Mexico.
(4) Failure to proved an enforcement process, mechanism and management to ensure compliance with the mitigation plans required for this project
(5) Nonexistent public comment session inputs into the NEPA documentation, public outreach, and mitigation as there were no public question and answer periods or transcripts.
(6) There is no plan in the DRAFT EIS that to ensure compliances so long-term degradation does not occur within or near the facilities, including the ROW.

5. **Draft EIS Conclusions**.

As shown in this cover letter, two sections, and attachments, many serious and significant environmental issues will remain unresolved for this project. This project does not have to be approved until all significant environmental issues of this Action have been resolved and the

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resultant impacts are *reasonable* when compared to benefits. It is unreasonable to permit two ROWs when options for using one ROW can be found. This project needs to consider using only one ROW.

Then, when is this Project reasonable?

First, when all the critical long-term environmental impacts that may result from building, operation, and removal of the project have been resolved.

Second, when all interactive, coordination and "connected action" issues have been resolved.

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IF, the remaining impacts remain so significant that even a complex series of mitigation efforts will not adequately reduce the risk to the health and safety of citizens, to the environment, and that the risk remains significant and long-term environmental impacts, then the project is unreasonable and should result in a recommended NO ACTION decision.

6. **Draft EIS Recommendations**. Because the impacts of this project as described for the Alternatives described remain significant and cannot be reduced to a satisfactory or to a reasonable level, then the only prudent decision is that the appropriate decision makers should select the NO ACTION Alternative, UNLESS resultant "conclusion" above had clearly demonstrated that this Project is reasonable.

At this stage, missing elements in the DRAFT EIS make this project unreasonable and NO ACTION Alternative pertains; however most issues are correctable to make parts of this project reasonable, as recommended by these comments. Reconsideration of TWO parallel ROWs is essential as it is very doubtful that the additional width for two rows of towers could meet the approval of any local, state or even federal siting authorities.

7. **Mailing List**. In response to references (b) and (c), please add my name and address to the mailing list for the SunZia Transmission Project.

Respectfully submitted,

Marshall Magruder
Systems Engineer
marshall@magruder.org
520.398.8587

2084	Response to Comment
20	Comment noted.

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SECTION 1

AREAS OF SIGNIFICANT ENVIRONMENTAL IMPACTS NOT ADDRESSED IN THE DRAFT EIS.

The following areas of significant environmental impacts were not addresses in the Draft EIS, as summarized in the cover letter. These issues lead to many questions, as shown below, that should be answered in a Supplemental or the Final EIS for this project.

1.1 The Project Need or Requirement is NOT Defined or Explained to Justify this Project.

21 This Draft EIS does not adequately define the "need" or the requirements for this transmission system but speculates that such a need might exist based on EPS from various states. The following information necessary to support this transmission system:

a. Where is are the specific "renewable energy" generation sources located that will connect to each substation as shown on a map, including how they will connect?
b. What is the estimated load generation capability for each of these new generation sources?
c. What are the daily, monthly and seasonal generation variability schedules associated with these generation sources?
d. What is the status of agreed Purchase Power Agreements (PPAs) and Interconnection Agreements with these generation sources? This is necessary to demonstrate there is a viable or real need for this costly transmission system.
e. Why are no interconnections shown to support the 1,000,000 people who live in Northeast Pima County and the City of Tucson?
f. Why are no interconnections shown for El Paso, Texas and all cities in New Mexico?
g. What are the local, regional, and cumulative total environmental impacts due to the "connected actions" of the proposed renewable energy generation sources?[8]
h. Who are the known generation sources that have specifically applied for these transmission services?
i. Since none of the recently selected BLM areas for solar and wind generation in Arizona and New Mexico are all west of the western terminal of this system thus, are there any solar and wind generation sources on BLM lands that will use SunZia project?
j. Who are known regional solar and geothermal electricity generation systems are in the envelope of the SunZia transmission system?

[8] A "connected action" is defined as:
*"those actions that are 'closely related' and 'should be discussed' in the same NEPA document (40 CFR 1508.25 (a)(1)). Actions are connected if they automatically trigger other actions that may require an EIS; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and **depend upon the larger action for their justification** (40 CFR 1508.25 (a)(1)). Connected actions are limited to actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions, but may need to be analyzed in cumulative effects analysis if they are reasonably foreseeable." [BLM NEPA Handbook, p. 130]*

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21	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity. Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, "2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions" (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS. The typical separation between two parallel 500 kV transmission lines would be 200 feet to meet WECC rating criteria for the proposed SunZia Project. The two lines would be constructed within a single 400 foot-wide right-of-way.

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21 k. Western Texas wind power generation systems are in the Eastern Connection or Texas Grid, thus does SunZia have plans to use the Tres Amigas multi-grid AC/DC/AC interconnection?

l. Why are two parallel ROWs considered necessary as double-circuits and even triple-circuits are used to reduce the ROW footprint and all of the resultant environmental impacts?

22 m. Minimal, at best, geothermal generation exists in the entire region. Only one possible geothermal electric generation is location, about 25 miles SW of Lordsburg is shown in the Economic Analysis Supplement.[9] There are no known thermal electric generation capabilities in southeastern Arizona. Most geothermal energy capabilities are for geothermal heated water at less than 50C that is useful for "greenhouse, space heating, aquaculture, direct heating, spas/resorts/recreation" according to the figure's legend. Why is ANY thermal electric generation included in the Economic Analysis Supplement or in this Draft EIS?[10]

n. The assumptions for Economic Impact Supplement include a 50 MW geothermal plant. These and others need an independent professional review in order to demonstrate any validity for economic benefits of this project. Will a new Economic Impact assessment for this project be developed, and, if so, could it be presented in a Supplemental EIS or on the SunZia website for review by the public? [Editorial note. In order to have any validity, the project's Economic analyses should not be constructed just for speculative investors but needs an independent review or "scrub" before it is made public.]

23 o. There are some data included about the benefits to the environment and human health in the DRAFT EIS; however, specifics, based on the known local, regional and cumulative (over 50-years) environmental impacts were not provided. Will these be included in a Supplemental EIS? For example, what are the impacts of the change to renewable generated electricity along the envelop of this project to groundwater levels, air pollution, landfills, and human health benefits? How much coal ash will NOT be accumulated based on these generation projects that will use the SunZia Project?

24 p. Specifically, how much cumulative groundwater will be saved and what will be the impacts to the water table based on the projected renewable generation determined in response to questions above?

25 q. What are the cumulative impacts on Native American cultural resources and material gathering areas impacted by this and its interconnected project?

Will BLM Respond to each question above in a Supplemental or Final EIS?

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9 See Draft EIS, Maps Volume, page 18, Figure 1.6, "Map of Geothermal Resources in New Mexico."

10 See www.sunzia.net, "SunZia Transmission Line Economic Impact Assessment Supplement – Impacts of Potential Alternative Generation Facilities" with Errata, by Alberta H. Charney, et al (University of Arizona and New Mexico State University), April 2011, pp. 17-18. For example for Geothermal (50MW), from Table SC-1, "construction-related revenues" by county are: Cochise County $606,680; Graham County $510,990; Greenlee County $89,410; Pima County $717,420; Pinal County $744,210 with no geothermal electric generation capabilities in Arizona. Additional misleading (clearly erroneous) "estimates" abound throughout this report including 854 jobs in Arizona involving geothermal electricity generation with $113.35 million in annual sales. None of these numbers are realistic or even possible based on the natural environment in this region.

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2084	Response to Comment
22	Geothermal electric generation was included as one component of the total capacity attributed to renewable energy for each of the SunZia Energy Development forecast analysis as stated in Section 4.17.3.3 of the DEIS. Based on the capacities described in the WREZ, geothermal resources would represent approximately 7 percent of the total renewables in the 6 QRAs that have been identified within the vicinity of the proposed Project. As noted, specific locations of geothermal resources were not identified by the WGA and DOE studies. Potential geothermal resources for electric power generation in southeastern Arizona have been identified; therefore, it is reasonable to include geothermal resources in the hypothetical scenarios used in the economic studies. It is noted that geothermal resources would not exceed 3.3 percent of the total line capacity.
23	Potential benefits may occur from future reductions in fossil fuel generation; however, a correlation between construction and operation of the SunZia Project, and potential generation sources cannot be predicted. As an example of beneficial cumulative impacts, the following paragraph in Section 4.17.4.2 in the DEIS (Cumulative Effects, Climate and Air Quality, Global Climate Change pg. 4-280) has been revised in the FEIS as follows: "With respect to climate change, renewable energy such as wind and solar have limited GHG emissions, as compared with a conventional fossil fuel-fired generating facility. *Current trends indicate that GHG emissions from generation facilities are declining because of regulations, fuel costs, and market demand. In general, further reductions in GHG emissions could accelerate in the future to the extent that renewable energy sources become more accessible to the electrical grid*."
24	Due to the wide variation of site specific conditions and water use among various generation projects, it is not possible to meaningfully quantify amounts of groundwater conserved by potential renewable energy generation sources.
25	The types of cumulative impacts to Native American cultural resources have been identified in Section 4.17.4.8 of the DEIS. As stated, in order to locate and evaluate specific site impacts intensive pedestrian surveys are needed.

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1.2. **Comparing Competing Projects as SunZia Project EIS ALTERNATIVES and a Possible NO ACTION Alternative**.

Some ground rule statements made by the Bureau of Land Management are of concern, in particular, comments related to the NO ACTION Alternative. The NO ACTION Alternative option is a ***reasonable***, viable and logical decision by the BLM Land Manager, especially, if no firm requirements or the Project's need does not exists to justify the resultant environmental impacts from the project. 26

A prudent decision maker will weight the total environmental costs to the benefits a project may offer.

Since there are several cumulative actions or projects, then ALL related projects must be compared as Alternatives to each other. It is highly probable that one or two of these three concurrent and competitive projects could come to fruitarian. All federal land managers, including BLM, must make this decision. Without having all three projects compared as Alternatives to the others, a suboptimal decision will result with unintended consequences lasting for a half-century or more.

The Final EIS must discuss the legal rationale for not making a NO ACTION Alternative decision, especially in view of prior case law.

27 **Will BLM Respond to each question above in a Supplemental or Final EIS?**

1.3. **Some Analyses or Discussions need to be included that are missing or not found**.

a. Nonexistent analysis of the environmental impact of the fuel used for vehicles, in particular, considering the use of low-sulfur content fuel for all trucks and mobile equipment. 28
   1. Are all of the vehicles to be used designed to use low-sulfur content fuel?
   2. If not, which will not use low-sulfur content fuel and is there a plan to convert these vehicles for this fuel type?
   3. What are the total and cumulative sulfur dioxide (SO2) amounts per year, every five years, for twenty years of operations for this project from these sources?

29 b. Nonexistent analysis on the impacts of the "transmission line roads". Which roads are temporary and which are permanent?

30 c. Are there any natural gas or liquid petroleum lines near the ROW? (See Attachment 2)

31 d. Will there be a fence on each side of the transmission line ROW? (See Attachment 2)

32 e. The DRAFT EIS does not include a reclamation plan for the transmission line ROW.
   1. Will the utility ROW be restored to its original, or nearly original condition?
   2. How will invasive plant seeds be prevented from reaching this ROW?
   3. Will the EIS or ROD include a reclamation plan for this ROW?

33 f. Nonexistent public inputs into mitigation plan needs and compliance to ensure long-term degradation does not occur. The public has almost no confidence that this inexperienced company can operate in an environmental safe and effective manner. This can only be overcome by having clear objectives with accomplishment criteria published and reviewed by this skeptical public. The requirements for bonds may be necessary to fund unintended costs needs to be adequate and used, when necessary, to ensure compliance.

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2084	Response to Comment
26	Other transmission line projects including the Southline Transmission Project are not considered alternatives, or competing projects, to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.
27	Responses are provided in this FEIS.
28	Vehicle and construction equipment emissions were calculated based on standards that take into account common fuel usage, as described in Section 4.2.2.2 of the DEIS. While there is potential to reduce emissions using low sulfur content fuel, the availability of such fuels cannot be confirmed. During Project operation vehicle use would be limited to biannual patrols either by helicopter or ground maintenance vehicles.
29	Section 2.4.10.1 of the DEIS includes description of temporary and permanent access roads, which are included in calculations of ground disturbance indicated in Table 2-15. Resource specific impacts are based on the amount ground disturbance for each of the alternatives.
30	As described in Section 3.10.3.8 of the DEIS, natural gas and liquid petroleum pipelines occur throughout the study area, and in many cases are paralleled by the project. Safety issues associated with the placement of transmission lines adjacent to pipelines would be addressed during project design.
31	Right-of-way fencing will be provided where required based on land management or land owner stipulations.
32	The Noxious Weed Management Plan is Appendix B-2 of the POD. The final POD will include a reclamation plan and measures to treat or prevent the spread of invasive plants.
33	Comment noted.

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1. How will the Project keep the public informed as it will accomplish the requirements and meet the goals of an integrated mitigation plan?
2. What are the long-term objectives and consequences for non-attainment?
3. What is the individual bond requirement associated with each mitigation element for accomplishment if the company fails to achieve the stated requirements of a mitigation plan?
4. What is the funding process to ensure adequate bonding requirements are complied?
5. What criteria does the BLM use to demand bond funding necessary to meet a mitigation goal?
6. Can the BLM shut down this project if a mitigation plan is not accomplished or bond-funding criteria are not accomplished?

Will BLM Respond to each question above in a Supplemental or Final EIS?

2084	Response to Comment
34	The BLM will serve as the lead federal agency, and will designate a BLM Authorized Officer who will provide oversight for the Project. The BLM Authorized Officer will, on behalf of the BLM, be responsible for administering and enforcing the right-of-way grant and permit provisions for the BLM. The BLM will also ensure that mitigation measures and conditions of approval contained in this POD are adhered to during Project construction, operation, and maintenance. The BLM Authorized Officer will be responsible for written stop-and-resume work orders, and resolving any conflicts that arise relating to the Project on land administered by the BLM. Compliance will be managed by the BLM Authorized Officer and other BLM resource specialists as needed, in conjunction with the CIC. The process by which the BLM and the Proponent will conduct environmental monitoring, compliance, and reporting activities is described in Appendix A9. All areas of permanent disturbance would be restored in accordance with a Termination and Reclamation Plan to be developed by the right-of-way grant holder. One year prior to termination of the right-of-way, the holder shall contact the appointed BLM authorized officer to arrange a joint inspection of the right-of-way. This inspection will be held in order to agree to an acceptable termination and rehabilitation plan. The BLM authorized officer must approve the plan in writing prior to commencement of any termination activities.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
Volume I – Executive Summary and Chapters 1 to 5			

2084	Response to Comment
	See following page(s)

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
ES-1	ES.1 Introduction	• Comment: This is a "draft" EIS. • Conclusion: The word "Draft" should be added before environmental. • Recommendation: Add the word "Draft" prior to environmental.	p. ES-1, 1st paragraph, 1st sentence
ES-2	ES.1 Introduction	• Comment: The "purpose and need" given are for development of the EIS document, but not for the transmission project itself. • Conclusion: The need and electrical requirements for this transmission line project must be included. • Recommendation: Add at least one paragraph to describe the need and actual requirements for this transmission project.	p. ES-1, 3rd paragraph, 2nd sentence

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2084	Response to Comment
35	This statement refers to the preparation of the EIS document, which includes a draft and final.
36	The need and electrical requirements for the Project are described in the Applicant's Proposed Action/Objectives (Section ES.2 and Section 1.4 of the DEIS).

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
ES-3	ES.2 Applicant's Proposed Action	• Comment: An applicant's "objective is to increase transmission capacity" in order to "relieve existing transmission constraints". • Conclusions: At present, electricity is flowing from West to East (for AZ Cooperatives and El Paso Electric) and East to the West for TEP from Luna and Springerville. This is illogical. A regional transmission should not have bidirectional electricity, in the same area. This objective is NOT being met with the present flawed design and interconnections. There is no SunZia interconnection to El Paso Electric. This would result in increased capacity in West to East flows. There is NO interconnection with TEP for power for Tucson. The Tucson area and Coops have no benefits with SunZia. Add these interconnections. • Recommendations: (1) Add interconnection to El Paso Electric and other local utilities, (2) Add Interconnection to Tucson Electric Power in Subroute 4C3.	p. ES-2, 2nd paragraph, 1st sentence
ES-4	ES.2 Applicant's Proposed Action	• Comment: "The Project will be collocated with areas of ***undeveloped renewable resource potential*** to provide a path for energy delivery." • Conclusion: As shown in the Economic Analysis for this project, many of the analysis economic factors were in error for renewable energy economic impacts. For example, NO locations in Arizona have geothermal energy at sufficient temperatures to generate electrical power. There is only one "potential geothermal generation location" in New Mexico, about 25 miles SW of Lordsburg. Similarly, the solar generated electricity data are wrong. Therefore, **all economic forecasted data from this study are erroneous because of its faulty assumptions**. [11] Geothermal electricity production requires water at a minimum of 200F (93C); however, "newer technologies" have proven lower-temperature water at 165F (74C) has been used for electrical generation. [12] Economic Analysis data have just 1 location above 50C. • Recommendation: That a **NEW Economic Analysis must be conducted ASAP** and provided as an urgent Supplement to this Draft EIS. Without such corrections, then decisions are based on erroneous economic impacts that are, in general, presently grossly overstated.	p. ES-2, 2nd paragraph, 2nd sentence

[11] See www.sunzia.net, "SunZia Transmission Line Economic Impact Assessment Supplement – Impacts of Potential Alternative Generation Facilities" with Errata, by Alberta H. Charney, et al (University of Arizona and New Mexico State University), April 2011, On pp. 17-18, for example, the electricity from Geothermal (50MW) generation, in Table SC-1, "construction-related revenues" by county are:
Cochise County $606,680; Graham County $510,990; Greenlee County $89,410;
Pima County $717,420; and Pinal County $744,210.

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2084	Response to Comment
37	By means of interconnections at the Pinal Central Substation, and potential interconnections at intermediate substations, the SunZia Project would have the potential to interconnect with El Paso Electric, Tucson Electric, and other utilities.
38	Please see response to Comment No. 22.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
ES-5	ES.2 Applicant's Proposed Action	• Comment: Right of Way typically 400-feet wide, although ROW "up to 1,000 feet wide would be required under certain conditions." • Conclusion: This is a **very wide ROW, much more than is typically needed for a transmission line**, thus using DC for both circuits would be more efficient (less transmission line loss) and only require one instead of two independent structures. Either double-circuit on one set of towers but using two transmission line rows or corridors are absolutely not necessary. Two ROWs will add significant cost and additional environmental impacts. • Recommendations: (1) **Change from two to only one set of structures for this transmission system**, as there is no rationale reason for having two sets of structures, when one set, with two (HVDC), four (HCDC), five (2-HVDC/3-AC) or six (AC) conductors, depending on arrangement. (3) Reduce the total ROW width to 200 feet or less.	p. ES-2, 1st paragraph, 1st sentence.
ES-6	ES.2 Applicant's Proposed Action	• Comment: Right of Way typically 400-feet wide, although ROW "up to 1,000 feet wide would be required under certain conditions." • Conclusion: This is a very wide ROW, much more than is typically needed for a transmission line, thus using DC for both circuits would be more efficient (less transmission line loss) and only require one instead of two independent structures. Either double circuit but using two corridors is not necessary. • Recommendation: Change from two to only one set of structures for this transmission system, as there is no rationale reason for having two sets of structures, when one set, with two, four, five or six conductors, depending on the arrangement.	p. ES-2, 2nd paragraph, 2nd sentence.

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There are no potential geothermal electric generation capabilities in Arizona. Thus there are NO construction, operations and maintenance (O&M), personnel (jobs), or tax revenue potentials from geothermal electric generation. Additional misleading (clearly erroneous) "estimates" abound throughout this report including 854 jobs in Arizona involving geothermal electricity generation with $113.35 million in annual sales. Similar errors also exist for other renewable energy economic analysis.

[12] See BLM/USFS "Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Volume I: Programmatic Analysis" October 2008 at pages 1-6 to 1-9. Temperatures above 360F (182C) are used for "flash steam power plants"; 165F to 360F (74C to 182C) for "binary cycle power plants"; and >455F (235C) for "dry steam power plants."

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2084	Response to Comment
39	The proposed Project description is to construct two lines including one 500 kV AC circuit and a second 500 kV circuit, which could either be AC or DC, within a single 400 foot-wide right-of-way. Depending on local terrain conditions, a right-of-way up to 1000 feet could be required. The typical separation between two parallel 500 kV transmission lines would be 200 feet to meet reliability criteria required for the WECC interconnected system. Two 500 kV circuits installed on one double-circuit structure would not achieve the minimum required separation between circuits.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
40	ES-7	ES.2 Applicant's Proposed Action	• Comment: The proposed origination point (SunZia East substation) for this project is in northeastern Lincoln County, New Mexico. • Conclusion: This is about 25 miles from the SW corner of Guadalupe County, New Mexico, the origination point for a competing project known as Western Area Power Administration's Centennial West Clean Line Transmission Project. The Centennial West Project is similar to SunZia and exceeds all of the capabilities associated with SunZia as shown in Table 1 below. • Recommendation: That the Clean Line Project be considered as an ALTERNATIVE to the SunZia Project due to the duplicative and redundant nature. As shown in Table 1 in the Cover Letter, these projects are very similar and redundant, with the capabilities or characteristics of Centennial West Project and Southline superior to most of the same for the SunZia Project.	p. ES-2, 3rd paragraph, 1st sentence.
			Chapter 1 – Introduction.	
41	1-1-	1.1 Overview	• Comment: This sentence states that BLM will grant the ROW on "public lands" • Conclusion: BLM can only "site" a project on public "federal" land as it because only a state can grant a ROW on "state" public and private lands. • Recommendation: Before "public land" add "federal".	p. 1-1, 2nd paragraph, 2nd sentence
42	1-2	1.1 Overview	• Comment: "The Applicant … is evaluating options for a lease of 50 years or greater on state and private lands." • Conclusion: The Arizona State Land Department does not grant ROW leases for greater than 50 years. • Recommendation: Change to read "evaluating options for a lease up to 50 years on state and 50 years or greater on private lands."	p. 1-1, 2nd paragraph, 2nd sentence
43	1-3-	1.2 Project Description and Location	• Comment: This states, "up to three intermediate substations.." • Conclusion: This is NOT a very firm commitment for this project. It should be noted, at least in Arizona, intermediate substations are "sited" by the Sting Committee but each county may its own substation siting process. All intermediate substations can be only for an AC circuit. • Recommendation: Recommend changing to read "… the projects plan is for three intermediate AC circuit substations…"	p. 1-2, 2nd paragraph

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2084	Response to Comment
40	The range of alternatives considered included potential transmission line routes that could provide electrical interconnections with renewable energy resources located primarily within the Qualified Resource Areas (QRAs) for wind energy, in south-central New Mexico, and the QRAs for solar energy located in southwestern New Mexico (e.g., BLM designated Afton Solar Energy Zone) and southeastern Arizona. The Centennial West Project is not an alternative to the SunZia Project because it would not the same purpose and need.
41	The description is correct. *Public lands* refers to federal public lands as indicated by Title V of Federal Land Policy and Management Act.
42	As stated, the Applicant is "evaluating options" for a lease term of 50 years or greater, but has not yet applied.
43	Note that the siting committee and Arizona Corporation Commission do not site substations.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
44	1-4	1.2 Project Description and Location	• Comment: This and many other references to a possible DC circuit are indicated throughout the DRAFT EIS. • Conclusion: It is very important to know if these circuits are AC and/or DC, in particular, a single 780 KV DC circuit, with significantly less ROW requirements and more importantly, without Electromagnetic Radiation (EMF) issues would be less expensive, require just 2 conductors and not five or six as being proposed, etc. • Recommendation: it is recommended that this issue be resolved PRIOR to the Final EIS, because of its significant impact on width of right of way, EMF characteristics, etc. In Arizona Line Siting Case No. 73, a CEC was denied because the applicant changed from DC to AC after being granted his CEC permit. It is highly recommended that a single DC circuit be used to meet the only possible need for this project, to move renewable wind generated electricity from NM to Pinal County AZ.	p. 1-2, 4th paragraph, 1st sentence and footnote
45	1-5	1.3 BLM's Purpose and Need	• Comment: The quote implies "[build] transmission lines to convey this new energy from coast to coast." • Conclusion. The actual quote is "We'll begin to build a new electricity grid that lay down more than 3,000 miles of transmission lines to convey this new energy from coast to coast." This does NOT say that 3,000 miles of transmission lines will connect 'coast to coast" but overall, nationally, an additional 3,000 miles of new transmission will be needed for ALL the proposed renewable energy projects. Further, connecting transmission lines from "coast to coast" is impossible due to challenges when crossing from the Western to Eastern to Texas grids, each is synchronously independent of the other. • Recommendation: correct or delete this quote from President Obama's first weekly radio announcement after inauguration.	p. 1-5, 2nd paragraph, 2nd sentence

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2084	Response to Comment
44	The Project description as stated includes the option to build the second line as either AC or DC to preserve flexibility in the future.
45	The quote was included as background information regarding the need to construct new transmission lines in support of renewable energy generation. There are also plans to interconnect the regional transmission grids from coast to coast, although that is not the purpose and need for the SunZia Project.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
1-6	1.4 Applicant's Objectives	• Comment: "New Mexico and Arizona are *characterized as regional power exporting areas…*"[emphasis added] • Conclusion: These two states to have this reputation due to excess electric power presently generated by coal-fueled power plants in the Four Corners, northern Arizona and New Mexico, and near Willcox, Arizona. The resultant environmental impacts of these fossil fueled power plants result in harm to the environments in these states so that other states, namely California and Nevada, can have renewable energy provide their sources of power. These existing fossil fueled generation plants need to be replaced by clean renewable energy sources BEFORE renewable energy is exported to other states. Only then should renewable energy be exported. This DRAFT EIS only looks at exporting renewable electricity and not use of renewable power to replace existing fossil fueled power plants as its first priority for these two states. The Arizona Corporation Commission in prior line siting cases determined it would be better for Arizona to have cleaner air and more water than to export electricity to California and Nevada in order to reduce the cost of electricity or provide those states with renewable energy generated electricity BEFORE Arizona in the Deavers-II Line Siting Case. • Recommendations: (1) That regional (New Mexico and Arizona) fossil fueled power plants be replaced by clean renewable energy sources BEFORE exporting power to other states in order to reduce the regional environmental impacts. (2) That this Project be redesigned to resolve Arizona and New Mexico renewable energy requirements BEFORE consideration to export to other states. (3) That the DRAFT EIS should be modified to ensure Regional (AZ, NM) environmental benefits and cost to replace fossil fueled power plants are an Alternative before exporting electricity and adding air pollution and using ground water for electric generation for other states.	p. 1-6, 3rd paragraph, 1st sentence

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2084	Response to Comment
46	These recommendations are outside the scope of the SunZia Project's objectives.

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Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
47	1-7	1.4 Applicant's Objectives	• Comment: "The DOE reported that the transmission paths in southern New Mexico was *highly congested* in 2006, and remained highly congested at publication of their National Electric Congestion Study in 2009." [emphasis added] • Conclusion: This study, accomplished to meet the requirements of Section 1221 of the National Energy Policy Act of 2005, designated two areas in the county with congestion, one being in **Southern California** with the other between West Virginia and New Jersey. New Mexico and eastern Arizona were NOT one of these two designated congestion areas. In fact, specific counties were included in CA and in AZ they were Yuma, La Paz, Maricopa, and Pinal. **The SunZia proposal will NOT improve "transmission congestion"**. • Recommendation: Correct this sentence and its impact elsewhere in the Draft EIS. SunZia will NOT improve the congestion issues reported by DOE.	p. 1-6, 3rd paragraph, 2nd sentence
48	1-8	1.4 Applicant's Objectives	• Comment: This table shows the "net short" transmission capacity needed for solar and wind to meet RPS standards. • Conclusion: This table assumes all solar and wind energy will be developed away from existing transmission facilities, which is not occurring. Most RE projects are less than 10 MW, and thus do NOT need transmission lines but can easily use local distribution lines (at less than 115 kV). Even so, looking at 2025 (worst case), we see that the needed transmission is about 4,000 MW for Arizona and 3,000 MW for New Mexico. Assuming 50% of this uses distribution lines, then both SunZia and Centennial West Projects will NOT be required. • Recommendation: (1) That the DRAFT EIS include a Supplemental EIS to include both the impacts of Centennial West and Southline Projects as ALTERNATIVES. (2) That the same Supplemental EIS be used for all three projects.	pp. 1-6, 1-7, Table 1-1.
49	1-9	1.4 Applicant's Objectives	• Comment: This paragraph provides information that implies the primary reason for this project is to make transmission services available in the SunZia area of interest. • Conclusion: This impression from this paragraph is that this project is being developed with the "hope" that others will come, pay wheeling charges, and use the system, like what they say in real estate, build the homes and they will buy." • Recommendation: This impression leaves the "need" open.	p. 1-7, last paragraph

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47	The proposed project is an interstate transmission project between New Mexico and Arizona. Accordingly, the discussion of congestion relates to the area in which the project is proposed and the local congestion. As stated in the DEIS, "The [Department of Energy] reported that the transmission path in southern New Mexico was highly congested in 2006, and remained highly congested at publication of their National Electric [Transmission] Congestion Study in 2009" (p. 1-6). The transmission path within southern New Mexico that is referenced in this study is known as Path 47. Two existing 345-kV transmission lines within Path 47 include one that is operated by El Paso Electric (EPE), and another by Public Service Company of New Mexico (PNM). The available transfer capacity on EPE's transmission line is 0 MW in either direction (available online at http://www.oatioasis.com/EPE/EPEdocs/ATCV1701.10.pdf at pp. 58-59, last accessed on 10-12-12); PNM's transmission line has 0 MW of available transfer capacity in the east-to-west direction and 170 MW of available transfer capacity in the west-to-east direction (available online at http://www.oatioasis.com/PNM/PNMdocs/2012_atcdoc-pnm2-posted.pdf at page 58 last accessed on 10-12-12). The WECC three phase rating study for the SunZia Project demonstrated that the addition of a minimum of 3,000 MW of transfer capability would not negatively impact power flows on Path 47, which was identified by DOE as a highly congested path (available online at: http://www.wecc.biz/committees/StandingCommittees/PCC/TSS/Shared%20Documents/Projects%20Undergoing%20Regional%20Planning%20Rating%20Review/SunZia%20Southwest%20Transmission%20Project/SunZia_%20Phase%202_Study%20Report_Final.pdf last accessed on October 11, 2012).
48	Please see response to comment Nos. 26 and 40.
49	Comment noted.

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	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
50	1-10	1.10.3 Department of the Army	• Comment: This paragraph only concerns WSMR and Fort Bliss. • Conclusion: This paragraph does not discuss Fort Huachuca and the Electronic Proving Ground. • Recommendation: Add a reference to Fort Huachuca and the Electronic Proving Grounds.	p. 1-16, entire section
51	1-11	1.11 BLM Plan Amendments	• Comment: This refers to "public lands" which is too broad.12 • Conclusion: The BLM land use plans are only for federal land as states have this authority for state and private land. • Recommendation: Before "public land" add the word "federal"	p. 1-17, 1st paragraph, 1st sentence
52	1-12	Table 1-5	• Comment: Local ordinances also may pertain to substations separately from transmission lines. • Conclusion: To clarify, these separate actions could be indicated. • Recommendation: In first column, third entry starting with "Amending zoning..." after "transmission line" add "and substations"	p. 1-22, under "Local"
			Chapter 2 – Proposed Action and Alternatives	
53	2-1	2.2.2.1, Siting Opportunities	• Comment: Moderate siting opportunity levels include "natural gas/petroleum pipeline, 6-inch diameter or greater." • Conclusion: Attachment 2 in this review discusses safety issues involved with transmission lines and pipelines. • Recommendation: These safety hazards need to be included in the EIS.	p. 2-4, 2nd paragraph, 2nd bullet
54	2-2	Table 2-1, Environmental Sensitivity Summary	• Comment: One designation of land use by the US Forest Service are "roadless areas" that appear to meet the "Exclusion" sensitivity level. • Conclusion: Roadless areas are known and should be considered. • Recommendation: Add to the "data layers" a new entry for "US Forest Service Roadless Areas"	p. 2-5, under Land Use
55	2-3	Table 2-1, Environmental Sensitivity Summary	• Comment: State and county designated "Scenic Roads" were omitted. • Conclusion: Scenic Roads are known and should be considered. • Recommendation: Add to the "data layers" a new entry for "State and County Scenic Roads"	p. 2-5, under Visual and Recreation
56	2-4	2.3.3.2, Alternative Transmission Technologies	• Comment: This states "The environmental effects of constructing two DC lines would be substantially similar to the effects of one AC and one DC line." DC circuits require a smaller right of way. • Conclusion: DC lines require 2 conductions, AC lines require 3. A double circuit DC system would use only one set of poles with 4 conductors. A DC/AC arrangement on one set of poles is feasible. • Recommendation: A double-circuit DC and one AC/one CD on one set of poles have less environmental impacts and should be considered.	p. 2-35, Direct Current Transmission, 6th sentence

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50	This section refers to decisions to be made by the Department of the Army regarding applications for rights-of-way. No right-of-way application would be required for Ft Huachuca and the Electronic Proving Ground because right-of-way for the Project would not include any Department of Defense lands administered by Fort Huachuca.
51	Please see response to Comment No. 41.
52	Added "and substations" to table 1-5, as suggested.
53	Potential pipeline safety hazards would be addressed during engineering prior to construction. Text has been added to Table 1-5 of the FEIS to address pipeline safety, construction of transmission lines either crossing or in close proximity to pipelines. 49 USC Subtitle VIII Pipelines Chapter 601 Safety.
54	USFS Roadless Areas are not necessarily "exclusion" areas for the placement of transmission lines, as the roadless designation does not prohibit ground disturbance or project development. It only identifies areas currently "roadless".
55	Travel routes with scenic designations were inventoried and include national, state, county, and city designations (where applicable), listed in Table 2-1 of the DEIS "Scenic Road or Byway."
56	Please see response to Comment No. 39.

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	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
57	2-5	2.3.3.2, Alternative Transmission Technologies	• Comment: Only superconducting conductors were considered and rejected. The ACSR conductor was selected (Table 2-4) • Conclusion: The ACCR conductors discussed in Attachment 1, as Issue 3 with an Attachment, show that the ACCR conductors have a proven track record in our climate. ACCR conductors were not considered. • Recommendation: ACCR conductors should be considered instead of the lower capabilities for the proposed ACSR conductor for this project and included in the next EIS.	p. 2-38,, New Transmission Technologies
58	2-6	2.3.3.3, Alternatives to New Transmission	• Comment: This sentence indicates that DG systems range from 5 kW to 10 MW. • Conclusions: Most rooftop solar systems are less than 5 kW and distribution lines, at 69 kV, can carry over 100 MW. • Recommendation: Rewrite this sentence to read: "Distributed generation systems range from less than 1 kW up to 100 MW, in general, use local or distribution lines, while transmission lines are required when local generation exceeds 100 MW."	p. 2-40, "Distributed Generation", 1st paragraph, 1st sentence
59	2-7	2.3.3.3, Alternatives to New Transmission	• Comment: This paragraph is misleading, in particular that DG would not "increase regional transmission" and is in error in implying DG reduces reliability • Conclusions: (1) DG reduces the requirements for transmission because power is used nearer to the source, thus eliminating some transmission needs (contrary to SunZia's marketing strategy. " (2) Studies have shown that DG increases reliability by stabilizing the local grid. • Recommendation: Rethink and rewrite this paragraph because DG is very action that improves the nation's electricity system.	p. 2-40, "Distributed Generation", 2nd paragraph
60	2-8	2.3.3.3, Alternatives to New Transmission	• Comment: This paragraph lists six factors that are risks when multiple lines use the same corridor. • Conclusions: Based on these factors, adding two circuits on the same pole will eliminate the first 3 of these six risk factors (tower falling against condors on the adjacent line, shield ground wire from one tower reaching and adjacent conductor, aircraft damaging more than one circuit). The other 3 hazards exist for a single or multiple line corridors (fire, lightning, malicious damage). • Recommendation: Rethink using two sets of towers when one set can do the job!	p. 2-40, "Existing Transmission System Upgrades", 3rd paragraph

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57	The alternative conductor technology may be reconsidered, although such a change in the Project description would not result in substantial changes to the environmental analysis. Therefore no additional study is warranted.
58	The statement in Section 2.3.3 of the DEIS refers to "small scale local renewable energy generation" resources. Generation facilities greater than 10 MW are typically "utility scale" systems.
59	As described in Section 2.3.3.3 of the DEIS, distributed generation does provide for small-scale local renewable energy generation opportunities and may provide for improved local reliability in some areas on the local distribution systems, however the Purpose and Need for the Project is to provide access to significant utility scale renewable energy resources and increase the transmission capacity for the entire southwest region of the US. Text was clarified in Section 2.3.3.3 of the FEIS to respond to comment as follows: "*Distributed generation may increase local regional transmission capacity, however it would not increase regional transmission capacity by a minimum of 3,000 MW across the Southwest; and would not increase reliability on a regional transmission system scale. Therefore, the development of distributed generation resources would not meet the purpose and need and was eliminated from further consideration.*"
60	Please see response to Comment No. 39.

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	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
61	2-9	Table 2-3	• Comment: This table shows the typical transmission line transfer capacities and widths of typical rights of way. • Conclusion: For the same ROW width (200 to 250 feet), a 500 kV (AC) capacity is 1,500 to 2,000 MW while a 500 kV (DC) capacity is 3,000 to 3,500 MW, about a 50% greater capacity for the same ROW width. • Recommendation: Considering that ROW width is a critical environmental factor for transmission line siting, then DC is better than AC, for this one factor.	p. 2-41
62	2-10	2.3.3.3, Alternatives to New Transmission	• Comment: This sentence states that higher voltage transmission has "fewer line losses". • Conclusions: Energy is always required to transmit electricity that decreases as voltage increases. • Recommendation: Suggest changing to "less line or energy loss" to slightly clarify.	p. 2-41, "Existing Transmission System Upgrades", 2nd paragraph, 1st sentence
63	2-11	2.3.3.3, Alternatives to New Transmission	• Comment: The tone of this paragraph is that transmission presently is terrible in southern NM and AZ. • Conclusions: Unfortunately, several transmission lines are in this area but are sending electrons in opposite directions. This is very wasteful, in not only energy loss required with redundant parallel systems. This is due transmission line ownership challenges beyond the scope of this comment; however, a technical analysis would show that there is high margin of wasted energy expended in this area. If the "owners" would coordinate, they would not have to expend capital funding redundant, duplicative systems. There is no "congestion" other than that created by various utility owners, including rural cooperatives. • Recommendation: Suggest BLM have a technical expert from FERC or DOE provide it expertise to wring out the waste (and hopefully not fraud) that is presently occurring in southern NM and Arizona.	p. 2-41, "Existing Transmission System Upgrades", 2nd paragraph
64	2-12	2.3.3.3, Alternatives to New Transmission	• Comment: This discussion is not clear. • Conclusion: The double-circuit comparisons in Figure 2-8 (page 2-43) demonstrate that double-circuits are a reasonable alternative. Even in the AC circuit was 345 kV (not shown) and the other was a 500 kV the proponent's objectives could be met. The rationale for a wider ROW does not make sense. • Recommendation: Rewrite this paragraph.	p. 2-43 and 2-44, Double-circuit Structures

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61	Although a DC line has a greater capacity, it is only feasible if used for long distance transmission between two points. AC lines are required where multiple interconnections are needed.
62	Text revised as suggested by commenter.
63	Improvements to the transmission systems in New Mexico and Arizona would be beyond the scope of the SunZia Project.
64	Please see response to Comment No. 39.

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65	2-13	2.3.3.3, Alternatives to New Transmission	• Comment: These three paragraphs seem to miss the objective, such as using one side for 500 kV DC and the other for a 345/500 kV AC or DC. • Conclusion: Additional research will uncover DC/AC combinations. The AC side could go to intermediate substations while the DC side just bypasses. A much smaller ROW will be required and the discussion about two ROWs is not realistic. This project will obtain only ONE ROW and must be constructed with that in mind. • Recommendation: Reconsider this discussion but as a minimum, double-circuit in one ROW should be a limiting constraint on system design. This is a reasonable "mitigation" requirement that the BLM could require the SunZia proponent in order to obtain a favorable ROD.	p. 2-44, DC Option, all
66	2-14	2.3.3.3, Alternatives to New Transmission	• Comment: The paragraphs in this section are concerned about urban parts of this project. • Conclusion. This section avoids other related environmental issues. • Recommendation: Rewrite to include all of the various environmental impacts for this project. It is very incomplete.	pp. 2-44 and 2-45, Environmental Impacts, all
67	2-15	2.3.3.3, Alternatives to New Transmission	• Comment: The "public has expressed concern about electric and magnetic fields (EMF)". • Conclusions: (1) This sentence confuses "electric" or E fields with "electromagnetic fields" or EMF fields. All electrical currents emit (AC or DC) an electric (or "E") field but only AC has an "EMF" field due to the sinusoidal plus/minus frequency associated with AC. (2) The public is concerned primarily with EMF fields impacts on humans; however, induced currents form the E field can have serious safety consequences as described in Attachment 2. • Recommendation: Rewrite and clarify the two different emissions from electric lines.	p. 2-44, Environmental Impacts, 2nd paragraph

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65	The proposed Project description does not include a 345kV AC line as stated in the comment. The Applicant is reserving the option to construct the second circuit as either a separate 500 kV AC or a 500 kV DC line (the latter can potentially carry twice the capacity as the AC first circuit). As stated in response to Comment No. 39, the separation requirements for the two circuits are a minimum of 200 feet. The Project description is based on the Applicant's design feasibility evaluation of conventional electrical transmission systems, and therefore is not proposing a double circuit system that would include a 500 kV AC and a 500 kV AC or 500 kV DC on the same structure.
66	As stated in Section 2.3.3.3 of the DEIS, "[v]arious environmental impacts would result if it were feasible to implement the proposed Project by upgrading and consolidating existing transmission lines within existing rights-of-way in or near the I-10 corridor." It is acknowledged that other environmental impacts may occur from upgrading existing systems in the Tucson area; however, the discussion in this section is limited to potentially significant impacts that could occur.
67	As stated in Chapter 2 (pg. 2-44) of the DEIS, EMF refers to both electric and magnetic fields. Potential health effects resulting from exposure to EMF are concerns where transmission lines are located in proximity to residential areas or schools. Section 4-15 of the DEIS describes potential effects from electric and magnetic fields that could occur as a result of the construction and operation of the SunZia Project.

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68	2-16	2.4, Description of the Proposed Action and Plan of Development	• Comment: This paragraph discusses the content of a Plan of Development that will be incorporated "by reference into this EIS." • Conclusion: Incorporation by "reference" will prevent the public from understanding the plans listed and how they will be impacted. Further, these plans contain additional implementation details, "where the rubber meets the road" that MUSST be provided in either a Supplemental or, as a minimum, on the existing website (as these plans are revised, which is expected). Including them for public review, during the short time period allocated for Final EIS review, without feedback (as required for DRAFT EIS comments) is an essential right that this one statement seems to avoid. The "plans" described in the POD are typically found as testimonial exhibits during line siting hearings. • Recommendation: That the draft (and as modified) Plan of Development (POD) is created, it is provided to the public on the BLM Project website with a reasonable time allocated for public comments for each of the plans described in this paragraph of the DRAFT EIS. Providing the POD for public review with the Final EIS is too limiting for meaningful feedback and corrective actions by the proponent.	pp. 2-45 am 2-46, 2nd paragraph (all)
69	2-17	2.4.1, Overhead Transmission Lines.	• Comment: Option A is for two single-circuit 500 kV AC transmission lines. • Conclusion: Requiring TWO rights of way, each 200-feet wide, is a terrible option when double-circuit on one set of towers will accomplish the same objective at less cost, less environmental impacts, and a dozen other reasons. There is NOT justification for OPTION A, being two separate single-circuits. • Recommendation: **That OPTION A be changed to be a double-circuit 500 kV AC with a 200-foot ROW.**	p. 2-46. 2nd paragraph, Option A and p. 2-47, Table 2-4
70	2-18	2.4.1, Overhead Transmission Lines.	• Comment: Option B is for one single-circuit 500 kV AC and one 500 AC or DC single-circuit transmission lines in a 400-foot right of way. • Conclusion: Requiring TWO rights of way, each 200-feet wide, is a terrible option when double-circuit on one set of towers will accomplish the same objective at less cost, less environmental impacts, and a dozen other reasons. There is NOT justification for OPTION B, being two separate single-circuits. • Recommendation: **That OPTION B be changed to be a double-circuit 500 kV AC and a 500 kV DC transmission line with a single 200-foot ROW.**	p. 2-46. 3rd paragraph, Option B and p. 2-47, Table 2-4

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68	The preliminary POD has been provided for public review on the BLM website located below. http://www.blm.gov/nm/st/en/prog/more/lands_realty/sunzia_southwest_transmission.html
69	Please see response to Comment No. 39.
70	Please see response to Comment No. 39.

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71	2-19	2.4.1, Overhead Transmission Lines.	• Comment: The Nominal voltage for the AC circuit(s) is "500 kV to 525 kV AC" • Conclusion: This is a change from elsewhere in the DRAFT EIS. If this range of 500 to 525 is being requested, it should be the same throughout the DRAFT EIS. • Recommendation: Change the AC voltages to be consistent throughout the entire EIS.	p. 2-47, Table 2-4, Electrical Properties
72	2-20	2.4.4, Conductors	• Comment: This section described the ASCR (aluminum, steel-reinforced core) conductors. • Conclusion: See Attachment 2 for a description of the ACCS conductor. • Recommendation: Conduct a "trade-study" to compare the ASCR versus the ACCS and provide the results on the BLM project website.	p. 2-57, all
73	2-21	Table 2-10, Standard Mitigation Measures	• Comment: No mitigation safety measures are shown for the factors described in Attachment 2. • Conclusion: The measures suggested in Attachment 2 appear to be reasonable and, after review for applicability to this project, each of the appropriate high voltage transmission line safety measures will need to be added to Table 2-10. • Recommendation: That Table 2-10 is modified to include safety mitigation measures as recommended in Attachment 2.	p. 2-87, Table 2-10
74	2-22	Table 2-10, Standard Mitigation Measures	• Comment: This mitigation measure requires "dulled" metal or self-weathering finishes to be used to reduce visual impacts. • Conclusion: To reduce the visual imprint of the structures, the less contrast between the finish and the background will "hide" the structure. The utility poles are most visible when there is a significant contrast between the pole color and the background. For poles on ridgelines and passes, the background will be the sky. Thus, using surface finishes of either dulled-gray galvanized steel or dark brown core ten should be chosen to reduce the contrast. Poles on ridgelines and in Passes should be dulled-gray in color and those in wooded areas, core ten. • Recommendation: That the BLM Authorized Officer use "contrast" between the structure and its background as the key criteria to reduce visibility when deciding between "dulled" versus self-weathering finishes.	p. 2-87, measure 11l

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71	The application is for a nominal 500 kV transmission line, although the design characteristics specified in Table 2-4 indicate that a nominal 500 kV AC line could be operated at a voltage between 500 kV to 525 kV. References in the entire EIS indicate a 500 kV (nominal voltage).
72	Please see response to Comment No. 57.
73	The safety measures described in the BPA pamphlet (attachment 2), refer to safety for "those who live and work around power lines." These are safety measures and not mitigation measures.
74	As specified under visual resource methodology (see Section 4.9.2.1), a contrast analysis was conducted for all the alternatives to determine potential impacts to visual resources. BLM VRM Staff will recommend the type of structure finish for the Project based on the contrast analysis and in cooperation with other affected federal, state, and local jurisdictions.

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75	2-23	2.5.4, BLM Preferred Alternative and 2.5.4.2, Arizona	• Comment: This section describes the BLM Preferred Alternative. • Conclusion: As recommended by the project proponent, subroute 4C2 is NOT preferred when compared to subroute 4B. • Recommendation: This party has recommended subroute 4C3 as my primary preferred alternative and subroute 4B as my secondary preferred alternative.	pp. 2-102 to 2-104,
			Chapter 3 – Affected Environment	
76	3-1	3.3.3.2, Geological Hazards	• Comment: This paragraph discusses earthquakes near Fedonia. • Conclusion: The most significant earthquake in modern time was the 3 May 1887 earthquake in the San Bernardino Valley, Sonora, Mexico, which measured VII on the Modified Mercalli intensity scale in Tucson and III in Albuquerque, New Mexico. This quake just south of the border would be a magnitude 7 quake today. Boulders the size of homes rolled down the Rincon Mountains and into the streets of Tucson. (ref: Susan M. DuBois and Ann W. Smith, *The 1887 Earthquake in San Bernardino Valley, Sonora*, Arizona Geological Society Special Paper No. 3, December 1980). • Recommendation: That the 1887 quake also be discussed and the impacts of a magnitude 7 quake on this project.	p. 3-28, Seismicity (Earthquakes), 2nd paragraph.
77	3-2	3.3.3.2, Flooding	• Comment: One major substation, the TEP South substation is about 50% in the 100-year floodplain. This substation is adjacent to the Santa Cruz River and on the opposite side is a Molybdenum processing plant that also would flood with serious toxic chemicals surrounding this substation. • Conclusion: The Project does NOT interconnect with the TEP circuits for Tucson and Pima County. • Recommendation: One reason this party preferred Alternative is Subroute 4C3 (Tucson) is to provide another path, another power source for Tucson if this station floods and Tucson loses about 1/3rd of its interconnections to generation.	pp. 3-27 and 3-28, Flooding, all.
78	3-85	Table 3-30, Species Addressed by the ESA...	• Comment: The Jaguar is listed as not having a critical habitat. • Conclusion: On 17 August 2012, the USFWLS designated a "critical habitat" of 838,232 acres in Pima, Santa Cruz, and Cochise Counties in Arizona and Hidalgo County in New Mexico for the Jaguar with some parts of this area near the Group 4 routes. • Recommendation: Correcting this portion of the table.	p. 3-85, under Mammals

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75	Comment noted.
76	Revised text in Section 3.3.3.2 of the FEIS to reference 1887 earthquake.
77	Comment noted.
78	The USFWS published the proposed rule designating critical habitat for the Jaguar in August 2012, after the May 2012 publication date of the DEIS. The FEIS has been updated with all listing or critical habitat rules released since publication of the DEIS.

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79	3-89	3.6.6.1, Endangered Species Act… and 3.6.8.1, Wildlife Linkages	• Comment: This section provides information about the jaguar. • Conclusion: The recent USFWLS designation of a critical habitat contains later and updated information, including the latest siting was in the Whetstone Mountains in Cochise County. The Rincon-Santa Rita-Whetstone wildlife corridor includes potential jaguar as a user. • Recommendation: Consider reviewing this report and updating this section, if applicable.	p. 3-89, Jaguar (Panthera onca) and 3-109
			Chapter 4 – Environmental Impacts	
80	4-1	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: The Southline Transmission Project is briefly discussed and the comment indicates as of January 2012, "there is insufficient information on the project and therefore cannot be meaningfully evaluated in the analysis although the project is considered a reasonable foreseeable future action." • Conclusion: Since January 2012, this project has completed the Scoping Phase and the Draft EIS is being developed under BLM New Mexico as the Lead Agent. This project is very relevant and duplicative of many of the capabilities in SunZia and MUST be compared as an Alternative to SunZia. Other information in this paragraph is also misleading or erroneous as the Eastern terminal is near Las Cruces, NM and not at the Apache Power Plant in Arizona. • Recommendation: (1) That BLM SunZia and Southline Project Managers exchange information. (2) That a Supplemental EIS be developed to compare these projects.	p. 4-248, under Transmission Lines, 1st paragraph
81	4-2	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: This Figure shows locations of potential cumulative effects activities locations. • Conclusion: Known such cumulative effects are not included, are incomplete or erroneous. • Recommendations: (1) That the Southline Transmission system be properly shown. (2) That the Centennial West system be properly shown. (3) That the Rosemont Copper 138 kV line be shown. (4) That the Vail to Valencia 138 kV line be shown. (5) That the El Paso Natural Gas Lines be shown. (6) That the Three Points-Sasabe proposed gas line be shown.	p. 4-249, Figure 4-1

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2084	Response to Comment
79	Please see response to Comment No. 78.
80	Additional information regarding the Southline Project has been provided after the publication of the SunZia DEIS, and has been included in the FEIS (Section 4.17 Cumulative Impacts). Please also see response to Comment No. 26 regarding comparison of alternatives.
81	Information regarding reasonably foreseeable future actions provided in the DEIS has been updated in the FEIS. A comprehensive list of past, present, future, and reasonably foreseeable future actions within the Project area is included in Table 4-30; the Rosemont Copper and Vail to Valencia 138 kV lines were added to this list. Figure 4-1 is not all inclusive, but is provided to illustrate locations of major projects (clarification was added in Section 4.17.3.2 in the FEIS to describe the scale limitations of Figure 4-1).

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Significant Comments, Conclusions and Recommendations in the Draft EIS

	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
82	4-3	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: No airports or copper mines are shown as having "Health & Safety/Hazardous Materials". • Conclusions: A "•" should be under Health & Safety/Hazardous Materials for All airports due to air hazards from utility poles, fuels stored at airports, etc. and for all copper mines that have explosives and large amounts of acids and other toxic and hazardous materials. • Recommendations: That a "•" be added under Health & Safety/Hazardous Materials for All airports and for all Copper Mines.	p. 4-254 to 4-256, Table 4-30
83	4-4	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: there is no entry under transmission lines for Centennial West and an error under Southline. • Conclusions: There is no entry for Centennial West Transmission line and an error under Southline. • Recommendations: (1) That the "345" under Southline be changed to "345/230". (2) That an entry be made for Centennial West, see Table 1 in the Cover letter for data.	p. 4-260, Table 4-30
84	4-5	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: there are two entries for "Kinder Morgan SFPP L. P. El Paso to Tucson (Phoenix) pipeline." • Conclusions: The first such entry should be deleted as the second is more comprehensive and descriptive. • Recommendation: That the "Kinder Morgan SFPP L. P. El Paso to Tucson pipeline" entry is deleted.	p. 4-262, Table 4-30

Marshall Magruder Review Comments on the SunZia Transmission Project DRAFT EIS August 22, 2012
Page 33 of 60

2084	Response to Comment
82	As stated in Section 4.17.4.5 of the DEIS "The area of analysis includes the Project right-of-way and areas that would be affected by noise and electrical effects surrounding the right-of-way." Although all airports and copper mines may have potential health and safety concerns, the criteria for cumulative effects analysis relate to potential cumulative impacts with the proposed project.
83	New information has been provided regarding the Southline Project in the FEIS. The Centennial West project was excluded from the cumulative analysis because it would not be located in the Project cumulative analysis resource areas for the SunZia Project.
84	Comment noted. Entry deleted in Table 4-30.

2084

Section 2

Significant Comments, Conclusions and Recommendations in the Draft EIS

	No.	Subject	• Comment(s) • Conclusion(s) • Recommendation(s)	DEIS Page, paragraph, sentence
85	4-6	4.17.3.2 Identification of Past, Present, Future, and Reasonably Future Actions, Land Uses and Projects	• Comment: The entry for Power Plants in Arizona for the Apache power station does not include its generation capabilities or its fuel (coal). • Conclusions: This entry should be complete. • Recommendation: That the entry for Apache Power Plant be completed.	p. 4-263, Table 4-30
86	4-7	4.17.3.3 Energy Development Forecast Analysis	• Comment: The Final BLM Programmatic EIS solar and wind projects are NOT near the SunZia project area of interest. • Conclusions: This entry is misleading. Seven utility-scale BLM PEIS solar or wind for 5,000 MW of generating capacity projects are being expedited by the present administration that will site two in Arizona with five others in California, Wyoming and Nevada. This recent announcement is to expedite major renewable energy infrastructure projects are the 425 MW Mohave Wind Energy and the 100 MW Quartzsite Solar Energy Projects, both located in western Arizona.[13] None of these proposed projects are sited in New Mexico. • Recommendation: That this statement and others concerning the BLM PEIS in the DRAFT EIS be corrected to reflect that current status of these projects.	p. 4-269, 2nd paragraph
87	4-8	Table 4-39, Reasonably Foreseeable Future Projects	• Comment: The Tres Amigos Interconnection Project is not listed • Conclusions: This entry should be complete. • Recommendation: That an entry for Tres Amigas be added.	p. 4-311, under Substations
88	4-9	4.17.4.15, Health and Safety/ Hazardous Materials	• Comment: The electrical safety impacts of high voltage transmission lines from Attachment 2 are not included. • Conclusions: This entry should be added with Attachment 2 being considered. • Recommendation: That electrical safety impacts be added.	p. 4-321, all

[13] White Hours News Release, 7 August 2012, "We Can't Wait: Obama Administration Announces Seven Major Renewable Energy Infrastructure Projects that Would Power 1.5 million Homes to be Expedited," see http://www.whitehouse.gov/the-press-office/2012/08/07/we-can-t-wait-obama-administration-announces-seven-major-renewable-energ Also see an *Energy Prospects West* article " Feds to Expedite Major Western Renewable Projects" of 21 August 2012 at http://www.energyprospects.com/cgi-bin/package_display.pl?packageID=3890

Marshall Magruder Review Comments on the SunZia Transmission Project DRAFT EIS August 22, 2012
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2084	Response to Comment
85	Comment noted. Additional information added in the FEIS as follows. "*400 MW coal-fired power plant near Benson Arizona*, east of Highway 19, south of I-10"
86	Both programmatic EIS documents include the SunZia project area of interest. For example as shown in Figure 4-2 the NM EA Qualified Resource Area (QRA) for wind is primarily located in Lincoln, Torrance and Guadalupe counties in New Mexico; and there are four QRAs for solar resources identified, including the solar energy zones in Doña Ana County.
87	The Tres Amigas project was excluded because it would not be located in the Project cumulative analysis resource areas for the SunZia Project.
88	Please see response to Comment No.73 regarding BPA safety measures.

2193

From: Peg Hardman
To: BLM_NM_SunZia_Project
Subject: SunZia SW Transmission Project
Date: Wednesday, August 15, 2012 5:23:17 PM

1 To quote from those not supporting project: "wildlife experts, including representatives of the Cooperating Agencies, have indicated that a river crossing in the vicinity of Belen or south of Elephant Butte would have less of an impact on migratory bird populations. Eliminating those routes prior to full evaluation and scoping presented unfair bias for the landowners involved and leaves too many questions as to the feasibility of those routes for meeting multiple needs of the stakeholders."

To, "all birds and bats must be protected." There is nothing associated with the proposed project guaranteeing this and alternative sites are available off the major flyway. It is struggle enough to protect the Bosque del Apache without this project looming.

Please, do take the alternate sites if this project must be implemented. We who love the Bosque and its wildlife appreciate your attention and abandonment of plans to put the project where it is now proposed.

Thank you.

Dr. Peggy Hardman
Socorro, NM
Member, Friends of the Bosque del Apache

2193	Response to Comment
1	Section 2.3.3.1 of the DEIS describes alternative transmission line routes that were considered and eliminated. None of the proposed or alternative routes would directly affect the Bosque del Apache NWR. The alternative routes located adjacent to WSMR's north and west boundary, and crossing the Rio Grande south of the Bosque (subroutes 1C1, 1C2 and 1C3), were eliminated because they would not be feasible; these routes would cross either the Antelope Wilderness Study Area or military lands that are excluded for new rights-of-way. Alternative routes (WSMR Route 1/1A) that would cross the Rio Grande north of the Sevilleta NWR and then turn south west of the Sevilleta NWR, were eliminated primarily because of other restrictive land designations on BLM land west of the Sevilleta NWR, such as ROW exclusion areas, and would not be compatible with Cibola National Forest land management policies (DEIS Section 2.3.3.1, pg. 2-29).

2230

6035 North Canyon Road
Post Office Box 958
Benson, AZ85602
August 21, 2012

Mr. Adrian Garcia, Project Manager
SunZia Southwest Transmission Project
Bureau of Land Management
New Mexico State Office
Post Office Box 27115
Santa Fe, NM 87501

Dear Adrian:

I hope that this finds you well and enjoying what is left of our summer.

I am writing to you to express my opposition to the building of the SunZia power transmission line as it is described in the Draft Environmental Impact Statement dated May 25, 2012 (Draft). I write as a private citizen living in the Cascabel Community in Cochise County, in the State of Arizona. I believe that the SunZia project is not necessary and is not economically feasible. I believe that to build this project along any of the proposed routes except perhaps one will cause irreparable environmental damage and will potentially cause harm beyond anything that has been discussed in the Draft. I therefore support the No Action Alternative.

Persons from within my community as well as many others have written eloquently and in great detail about the kinds and amount of environmental damage that will occur if this program is built along the BLM preferred route, or along any of the other routes except perhaps along the route described in the Draft as 4C3, the route that goes through Tucson. I will express my concerns regarding some portions of the Draft that have not been addressed by others and I will add some information to what has already been expressed concerning other topics within the Draft.

The route described in the Draft as 4C3, the so-called Tucson route is the one that will cause the least amount of environmental damage among the routes described. This route crosses or comes near sensitive areas such as the Cienega Creek Natural Preserve and Saguaro National Park, but this route could be modified to minimize that damage by routing the line along the railroad right of way that already exists in that area, or by having it follow the Interstate 10 corridor. Potential obstacles that exist within the Tucson area could be avoided by selecting sub routes other than those described. There are ways to route the line through the city other than those that have been described in the Draft. Alternative routes through Tucson must be analyzed in an unbiased manner, and the Draft must be rewritten to show the results of these analyses.

2230	Response to Comment
	See following page(s)

2230

In addition to what has already been written by others, I would like to call your attention to several concerns that have not been addressed by the Draft. For example, the Draft rather obliquely mentions the service road, but does not discuss the impact of having a 24 foot wide road that is planned to run the entire length of the project. Anyone who lives anywhere outside a population center knows that roads that exist within an area will be used for one purpose or another beyond the intended purpose. The Draft does not adequately address this concern. If I consider only the portion of the power line that extends from the crossing of the San Pedro River at the point called the Narrows, and runs north on the west side of the river, I see some 40 miles of continuous road that runs roughly parallel to the San Pedro and two to four miles west of it. This means that we would have two roads running parallel to each other; one that is frequented by residents of this area and those passing through, and that is maintained by the counties involved, and sometimes patrolled by the Cochise County Sheriff's Department or other such agencies; and one that will be uncontrolled. I will not even attempt to list here all of the problems that such an uncontrolled road will cause. The statements made in the Draft do not come close to adequately addressing this issue. This issue must be analyzed more thoroughly and the Draft must be rewritten to reflect the results of those analyses. 1

The Draft talks about how the existence of this additional road will be "mitigated" by fences and gates. (Table 2-11, SunZia Selective Mitigation Measures, SE-4 and SE-6.) Anyone who lives in this part of the country knows about the effectiveness of gates and fences, which is essentially zero. To adequately patrol this road would put a significant burden on a County Sheriff's Department that is already suffering from inadequate funding. A sterling example of how ineffective fences and gates are at preventing unwanted crossings and unintended use may be found simply by looking at the border fence between Arizona and Mexico. Once again, the Draft does not adequately address this issue. This issue must be thoroughly analyzed and the results presented in the Draft. Only then can we begin to look for a solution to this problem.

In addition to this service road, it is difficult to imagine that there will not be a number of feeder roads that run between the service road and the main Cascabel Road. Such roads are mentioned in the Draft, but the reader is left with the impression that they will be built as needed to provide access to the towers and other equipment such as fiber optic substations, with no mention of how such access will be gained. While I understand that it is impossible to know how many such roads will be needed along the Cascabel Road between the Narrows and San Manuel, the oblique way in which these roads are addressed is more than a little disconcerting. Much of the property that borders on the Cascabel Road is privately owned, which means that easements will have to be negotiated, and rights-of-way will have to be purchased in some cases. (The alternative is imminent domain, but I think that you do not want to even start down that avenue.) The fact that such transactions are treated in such an off-handed manner is another deficiency in the Draft. This issue of gaining necessary access must be analyzed and solutions to these problems presented before the Draft can be given serious consideration.

A related concern is that between the Narrows and the point where the San Pedro crosses the Cascabel Road north of Redington, the road is on the east side of the river. This

2

2230	Response to Comment
1	As stated in Table 2-11 of the DEIS, selective mitigation measures will be applied as appropriate (SE-1, SE-2, SE-3, SE-4 and SE-6) to effectively minimize the impacts of road construction and unauthorized use of roads following construction. These measures would be included prior to Project construction in the final POD.

2230

2 means that any feeder road in that stretch of the San Pedro will have to cross the river to get from the Cascabel Road to the power line service road. Such river crossings are problematic for a number of reasons, not the least of which is erosion. These crossings are not mentioned in the Draft, but provisions for them must be made before the Draft can be considered to be complete.

Chapter 4 of the Draft seems to take the position that all, or nearly all effects of the project can be mitigated. This is not stated directly, but it is certainly the impression that one gets from reading the chapter. This leads the reader toward the false conclusion that that the project will have no lasting deleterious effects on the environment, which we know is not true. This way of presenting the concept of mitigation is not only inaccurate, but is also disingenuous. You and I both know that building that power line will wreak changes on the landscape that will be with us for ever, in spite of our best efforts at "mitigation." Such misrepresentations call into question the reliability of all of the analyses in the Draft. How can we believe any of it?

3 In Table 2-11, SunZia Selective Mitigation Measures, SE-2, it is stated that, "..Existing crossings would be utilized at perennial streams,.." and yet the SunZia power line crosses the San Pedro River at the Narrows by way of a new crossing when there is an existing crossing just 0.65 miles away. Why is this existing crossing not used? The Tucson Electric Power 345 KV transmission line crosses at this point and it seems quite reasonable to expand this already disturbed area to accommodate the SunZia line. The riparian area at the SunZia crossing is mentioned as potential critical habitat for the Yellow-billed Cuckoo and the Southwestern Willow Flycatcher, and yet you wish to create a crossing in this previously undisturbed area when there is an already disturbed area very close by. Why?

In Chapter 4 of the Draft, section 4.6.4.6 Three Links Farm, it is stated,

".. Placement of the transmission line across the river would present some collision hazard for birds using the San Pedro River corridor for migration and local movement. However, passerines make up the bulk of the bird activity along the river and their movements are likely primarily among vegetation along the river and not at heights where the transmission line would present a significant hazard to them. .." (my emphasis)

This second sentence is not true. Migrating passerines use the San Pedro River corridor almost exclusively in spring and fall, largely because previously used migration corridors are now filled with man made development and are no longer usable by the birds. Thousands of migrating passerines pass through the San Pedro corridor every year. Passerines often feed in the riparian areas during the day and migrate at night. Power lines crossing the river will definitely present a collision hazard to these nocturnal migrating passerines, and cause the deaths of birds that would not have happened had the power lines not been there. The fact that passerines do migrate at night is pointed out in Appendix B2, paragraph 4.2.1 in the section entitled *Potential Impacts on Nocturnal Migrant Songbirds*, but the author of the above mentioned section of Chapter 4 did not apply this information to birds migrating in the San Pedro River Valley. Burying the transmission lines as they cross the San Pedro River at this point is a possible mitigation measure, but it was not mentioned.

3

2230	Response to Comment
2	Comment noted. Additional analysis regarding access at the river crossing has been completed and provided in Appendix I of the FEIS.
3	Because of the terrain a new transmission line could not be constructed adjacent to the existing transmission line right-of-way. This crossing was selected because it is a location without perennial flow or riparian woodlands, where elevated terrain would allow the floodplain to be spanned and the need for vegetation management would be minimized. Please also see response to Comment No. 2 above.

2230

Appendix B2 is devoted to documenting the results of studies done to determine the effects of power lines on birds in the Rio Grande Valley, but no such study was done in the San Pedro Valley. If you were to consult the Tucson Audubon Society, they would tell you that the San Pedro River Valley is the most important bird migration corridor in the desert southwest west of the Rio Grande, and yet this is not mentioned in the Draft and the area has not been studied by BLM for the SunZia Project. Such a study could have been easily conducted at the Narrows during spring migration. I am left to wonder why such a study was not done. This is yet another example of the inconsistency of the information that is presented in the Draft.

The importance of ecotourism and related activities such as bird watching, and the effects that these power lines will have on such activities are also not mentioned in the Draft.

4 One concern that has not been addressed by the Draft but will be increasingly important in the future is the possibility of deliberate malicious damage to the power line. I found one reference to this kind of activity on page 2-40, but nowhere else in the document. Our world seems to be becoming smaller and at the same time more violent, and I believe that acts of terrorism and malicious violence against infrastructure will become more common in the future. An increasingly more complex power grid will almost certainly become increasingly more interesting to groups with political agendas or to those who simply want to commit mayhem. Power lines built in remote areas are more vulnerable to sabotage and terrorist attacks than are lines that are located in corridors such as along highways. It was pointed out in a U. S. Congress report that maintaining effective security of power transmission lines routed across vast, rugged and remote landscapes is essentially impossible.

Power lines in remote locations are also more likely to have prolonged outages caused by natural disasters such as wildfires and wind storms. While damage by such causes may happen anywhere, including in established corridors, repairing that damage when it is in a remote location will be more costly and will take more time than if the line were in an area that was readily accessible. This applies equally to any kind of damage to the line, including that described in the preceding paragraph. Once again the Draft has ignored a potentially very serious problem. The issue of maintaining the security of the power lines in remote locations must be addressed before the Draft can be seriously considered.

In closing I would like to talk just a little about the way that the Draft is organized. The document represents an enormous amount of effort on the part of analysts and researchers. The information generated by these people is then organized in a way that makes the document very difficult to read. There are a number of ways in which such a document could be organized, and the one chosen makes reading very difficult. My experience with reading Environmental Impact Statements is quite limited, so I do not know the protocol for writing such documents. I am a retired electrical engineer and I spent many years working for aerospace companies. I can say with certainty that if we had written our new business proposals in the way that the Draft has been written, we would surely have gone broke.

4

2230	Response to Comment
4	Comment noted.

2230

Thank you for taking the time to read these comments. I hope that this Project can be brought to a conclusion that is acceptable to all of us.

Sincerely,

Robert D. Evans
520-212-4580
Revans9173@aol.com

5

2230	Response to Comment
	See following page(s)

2236

From: Richard J. Kestler
To: BLM NM SunZia Project
Subject: Re: SunZiaProject
Date: Monday, August 20, 2012 5:30:12 PM

----- Original Message -----

----- Original Message -----
From: Carol S. Kestler
To: NMSunZiaProject@blm.gov
Sent: Sunday, August 19, 2012 5:42 PM
Subject: SunZiaProject

Attention: Adrian Garcia at NMSunZiaProject@blm.gov

Dear Mr. Garcia,

It was a pleasure to meet you at the public meeting in Tucson. Here is the follow-up email I promised at that time.

1 The SunZia Project adversly impacts the last free-flowing river in the Desert Southwest, part of the largest unfragmented landscape in Arizona outside the Grand Canyon region. It is one of the three remAaining major desert life corridors (along with Colorado and Rio Grande Rivers) left in Arizona. The San Pedro is habitat for numerous threatened and endangered species, and hosts one of the largest remaining intact mesquite forests in the world.

2 The area has been named one of the Nature Conservancy's "Last Great Places". It is the principal north-south migration corridor for Central American birds, recognized as a Globally Important Bird Area by the American Bird Conservancy. In addition, there is a rich archaeological history dating from earliest North American human occupation (Clovis).

3 SunZia will create an entirely new corridor down the San Pedro River Valley, with an accompanying road, for a minimum of 30 miles. This corridor will then become the principal utility transmission corridor in the Southwest, will have a major negative impact on the flora and fauna, and would, most likely, lead to more development, which would further deplete the water flow. This route was selected over the strong objections of valley residents, ranchers, conservationists, and political representatives. Building and maintaining such a route through previously wild and undeveloped land will destroy the entire nature of the San Pedro Valley and all if its eco-tourism value.

4 Furthermore, lines in remote areas are more vulnerable to sabotage, terrorist attacks, and natural disasters than are lines that are located in corridors such as along highways. Effective security for transmission lines routed across vast, rugged and remote landscapes is essentially impossible, and lines damaged by natural disasters are more difficult to repair.

Three federal conservation initiatives are currently focused on the San Pedro valley that conflict with SunZia: (1) an America's Great Outdoors conservation initiative, (2) a Fish and Wildlife Service wildlife refuge/collaborative conservation

2236	Response to Comment
1	Comment noted.
2	Comment noted.
3	Transmission lines associated with the Project would span river channels, and therefore would not affect the water flow. Impacts to flora, fauna and ecotourism, and associated mitigation measures are provided in Chapter 4 of the DEIS. Future proposals for new utilities and other development would be subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
4	Comment noted.

2236

initiative, and (3) a joint Natural Resources Conservation Service/U.S. fish and Wildlife Service Working Lands for Wildlife Habitat initiative.

Obama administration high-level energy policy advisers have seized upon SunZia as a way to fulfill the administration's renewable energy agenda, without carefully weighing the project's true impact, stated purpose, and likely outcome. In doing so, they have overridden lower-level officials and strong public sentiment against a San Pedro route.

5 The Southline Project currently being permitted accomplishes much the same objectives in southwestern New Mexico and southeastern Arizona with far less negative impact. Building both Southline and SunZia is redundant and makes each less economically viable because of competition for power generation.

While SunZia may facilitate development of some renewable energy sources, wind in particular, the extent of this is highly speculative. No companies have yet firmly committed to building renewable energy facilities in response to the project.

The speculative nature of generation sources, and the uncertain schedule of their construction, place the project at great financial risk. The project does not appear capable of making a sufficient rate of return to recover costs and make a profit. This also makes it unlikely that SunZia could repay federal loan guarantees tentatively reserved for the project under the American Recovery and Reinvestment Act of 2009. To date, Only the Salt River Project has a significant interest (13%) besides the Southwestern Power Group (MMR Group, 80%) in the project. Energy Capital Partners, which was to provide 40% of the capital to build the project, has withdrawn, and a replacement has not been found. The remaining partners appear to hold an insufficient interest to complete the project. There is much speculation that, to recuperate costs, the porject will attempt to build large fossil fuel energy centers, and sell the excess to California, rather than increase alternative fuel resources in Arizona and New mexico.

California has warned against building such lines because the state is projected to meet its Renewable Energy Portfolio requirements with its own resources. Arizona is projected to meet its own Renewable Portfolio Standards with in-state solar resources. The fundamental purpose of this project is to sell New Mexico power to these states to meet their RPS's.

I trust that public feedback will receive serious consideration at this time. Thank you.

Sincerely,
Richard J. Kestler
1311 E Duke Dr.
Tucson, AZ 85719
520 323-0185

2236	Response to Comment
5	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.

2262

Bureau of Land Management
Adrian Garcia, Project Manager
SunZia Southwest Transmission Project
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

Re: Comments on the Draft EIS for the SunZia Southwest Transmission Project (SunZia Project)

Dear Mr. Garcia,

1 Diamond Ventures, Inc. (DVI) owns and manages a diverse portfolio of real estate and water utilities concentrated in Southern Arizona. A number of DVI's residential and commercial properties as well as water utility service areas would be negatively impacted by the SunZia Southwest Transmission Project's alternative Subroute 4C3 (Tucson) depicted in the Draft EIS/RMPA released May 25, 2012. We are therefore submitting this letter in opposition to Subroute 4C3 (Tucson) for the Applicant's proposed transmission project.

DVI does, however, support the Applicant's project and efforts to locate the transmission project near areas capable of accommodating utility-scale renewable energy generating facilities that will provide a reliable power supply to growing cities throughout the southwest. In that regard, we support the Applicant's project if located within BLM Preferred Alternative route, which provides much needed energy transmission capacity while minimizing impacts to densely populated urban centers. We support the use of public land that has not been rezoned or entitled as the most appropriate choice as this mitigates the negative economic impact a project of this nature can have on private lands.

Given the significant impacts of Subroute 4C3 (Tucson) on DVI's assets, we would like to be notified of any new information or additional venues to provide formal comment. Thank you for the opportunity to provide comments on this matter.

Sincerely,

David Goldstein

2262	Response to Comment
1	Comment noted. Also note that Subroute 4C3 is not the BLM Preferred Alternative.

2293

From: snewsv@msmte.com
To: BLM_NM_SunZia_Project
Subject: Comment on DEIS SunZia transmission line
Date: Tuesday, August 14, 2012 4:06:07 PM

Attention: SunZia Southwest Transmission project

1 This is to register with you my comment on this project

My vote is ***NO OPTION***

2 This project is wrongheadedly looking to run a major road with spur service roads to an enormous transmission powerline which, in this form is not needed. California has said it doesn't need it; it has been developing its own renewable energy. Arizona has said it doesn't need it; it has been developing its own renewable energy. There's no market for it.

3 The region of the San Pedro it transverses is some of the last remaining wilderness in southeastern Arizona. It is largely unfragmented and it should remain that way. Next to the Grand Canyon region, it is the largest remaining area for one of the largest number/variety of mammals not just in the state but in the country, moving between sky islands and the San Pedro River. Leave it alone.

4 The history of this transmission line is suspect – it all started with the Bowie power plant and morphed into something much larger. The purpose and need statements are incorrect in portraying this line as largely generating renewable energy. We all know this is not true. In the first place, wind energy from the NM wind fields is totally variable, shown to often be the weakest when the need is the strongest.

5 Financing of this line was originally not going to take a governmental red cent. Well, that changed, didn't it! Investors have backed out and some remain uncertain.

The Obama administration officials, already embarrassed by the Solara circumstance where enough investigation was not done, will find themselves in the same place with this line. It will be another embarrassment. And at what cost? To the cost of the San Pedro valley which should be allowed to become a refuge and not trashed. SunZia has stated that once established, this corridor would become an energy corridor for whatever else someone wanted to run through it.

And what about the ease of sabotage – when something this enormous is so out of view to any authority, how easy to knock out the grid of a whole region. Energy needs to be generated from need to source on short distances, using solar and wind as available renewable partners until some means is developed to generate electricity locally and without massive disturbance. Once this is accomplished, and it will be or we won't survive, the damage done to this San Pedro bio-region would not be recoverable.

No Option! And certainly not through Aravaipa.

Sincerely,
Susan Newman
Cascabel, Az 85602

2293	Response to Comment
1	Comment noted.
2	Comment noted.
3	Section 4.6.5 of the DEIS discusses biological resources present in the San Pedro Valley, and potential mitigation measures to minimize impacts.
4	The Bowie Power Station site is located approximately 15 miles from the TEP 345 kV transmission line corridor, where it was permitted to interconnect with the existing TEP transmission system at the Willow-345 kV substation. The Applicant's objectives as stated in Section 1.4 of the DEIS include "to increase available transmission capacity in an electrical grid that is currently insufficient to support the development, access, and transport of additional energy-generating resources including renewable energy, in New Mexico and Arizona."
5	Comment noted.

2297

From: Stantonmail@aol.com
To: BLM NM SunZia Project
Subject: Public Comment
Date: Tuesday, August 21, 2012 1:03:24 PM

To Whom It May Concern:

I'm writing to convey my serious concerns about the routing of the SunZia Southwest Transmission Project as outlined in the "Draft Environmental Impact Statement and Resource Management Plan".

1 I'm particularly concerned about the impact of this project on the birds that migrate and feed in the vicinity of the proposed route, notably sandhill cranes and geese. From what I've read about the methodology employed in examining this aspect of the project's impact, it sounds flawed. The sample period for studying the impact on bird life was small and, furthermore, was not conducted at the appropriate time of the year. The decision to site the transmission lines in this are could have dire, even fatal consequences for the migrating bird population.

2 Similarly, I think that alternate routes for the project were dismissed based on erroneous or incomplete information.

3 I'm concerned as well that the siting of the route for this project will negatively impact the low-income human population in that part of the Rio Grande valley.

4 Finally, I think that siting the transmission lines within view of I-25 will greatly diminish the experience of travelers using that highway.

I think the route of the project should be changed or a new study should be conducted with changes in the methodology used.

Thank you for considering my comments.

Bill Stanton
PO Box 10154
Santa Fe NM 87504-6154
(505) 983-5241

2297	Response to Comment
1	The avian collision risk study included some survey periods outside the seasonal peak in Sandhill Crane numbers. Although Sandhill Cranes were not present for some surveys, the dates used to extrapolate collision risk (October 1-December 31) captured movement patterns from the time Sandhill Cranes begin to arrive in the Middle Rio Grande Valley.
2	Comment noted.
3	Section 4.14.3.2 of the DEIS describes the results of the analysis of impacts to environmental justice populations. As stated Subroute 1A1 (BLM Preferred Alternative) would be located within a ¼ mile of low density residential properties; “proximity to these properties indicates the potential for moderate impacts.”
4	Comment noted.

2305

August 21, 2012

533 Suffolk Drive
Sierra Vista, AZ 85635

Bureau of Land Management
New Mexico State Office
SunZia Southwest Transmission Project
Attn: BLM Project Manager Adrian Garcia
P.O. Box 27115
Santa Fe, NM 87508-1560

Dear Sir:

1 I have reviewed the Draft Environmental Impact Statement (Draft EIS) for the proposed SunZia Southwest Transmission Project. As a long-time resident of southern Arizona, I am familiar with the BLM public lands that are potentially affected by this project. I enjoy the scenic landscapes and outstanding recreational destinations that exist on BLM, Forest Service, and State Lands in southern Arizona. In my view, no matter which action alternative is selected, the proposed SunZia Project would have substantial and long-term resource impacts along the transmission corridor (potentially 530 miles long). I commend the BLM for taking great care in developing this Draft EIS and examining a wide range of issues and concerns. However, I believe the BLM can and should be more cautious in allowing this project to proceed as proposed.

I would like to offer the following comments and concerns:

1. Purpose and Need for the Project. Pages 1-2 to 1-9 of the EIS discuss the purpose and need of the project. On page 1-7, the EIS states: "The Project is needed to increase available transmission capacity in an electrical grid that is currently insufficient to support the development, access, and transport of additional energy-generating resources, including renewable energy, in New Mexico and Arizona." On page 1-5, the EIS further states: "The Project would be collocated with areas of undeveloped renewable resource potential to provide a path for energy delivery, and would provide power to help meet growing demand in the western United States and enhance domestic energy security." Thus, the reader is expected to believe that there are renewable energy providers waiting to develop generating facilities that will use the new transmission capacity to be provided by the SunZia Project. However, I would like to question that assumption for the following reasons:

a. In the state of Arizona, current and pending projects for solar energy are located primarily in the western desert areas of Maricopa, Yuma, La Paz, and Mohave counties. In addition, the BLM Solar Programmatic EIS proposes 2 solar energy zones in the western deserts (Brenda and Gillespie), while the Arizona BLM

2305	Response to Comment
1	Comment noted.

2305

Restoration Design Energy Project proposes 1 solar energy zone in Yuma County (Agua Caliente). See this link for additional details: http://www.blm.gov/az/st/en/prog/energy/solar/peis.html. None of these sites are located in southeast Arizona near the SunZia Project.

b. In the state of Arizona, current and pending projects for wind energy are located primarily in the northern areas of the state, including Mohave, Coconino, Apache, and Navajo counties. See this link for additional details: http://www.blm.gov/az/st/en/prog/energy/wind.html. None of these sites are located in southeast Arizona near the SunZia Project.

c. The BLM New Mexico web site indicates that possibilities of solar energy development are particularly good in the Las Cruces District. Regarding transmission capacity, the web site discusses the Southline Transmission Project, which is a new and rebuild 345 kV double circuit transmission project proposed by Southline Transmission LLC, that extends 360 miles from Las Cruces, New Mexico to Tucson, Arizona. The web site further states: "The Project is a bi-directional transmission line designed to fulfill three key objectives: (1) improve regional grid reliability in southern New Mexico and southern Arizona, (2) mitigate existing congestion on the regional transmission grid, and (3) facilitate the interconnection of renewable and conventional energy resources with the grid." See this link for additional details: http://www.blm.gov/nm/st/en/prog/energy/alternatives.html.

2 d. Based on the information presented above, one can conclude that the need for the SunZia Project as presented in the Draft EIS is questionable because (1) it is not located near Arizona's current and pending renewable energy projects, (2) there is already a transmission line project (Southline) that addresses the need for additional capacity in southern New Mexico and southern Arizona, and (3) there is no evidence that planned renewable energy facilities (if any) in southeast Arizona are on hold due to lack of additional transmission capacity.

2. Alternatives.

3 a. On pages 2-40 and 2-41, the Draft EIS discusses an alternative that was considered but eliminated, i.e., constructing the full length of the Project as an upgrade to the existing transmission system. While I understand the rationale given, I believe that a similar alternative should be considered that examines a combination of new and upgraded transmission capacity for selected portions of the corridor similar to the concept proposed by the Southline Transmission Project. Using existing infrastructure to upgrade transmission capacity may avoid the need for large expanses of new construction.

b. A recent Associated Press article dated August 16, 2012 stated: "In a surprising turnaround, the amount of carbon dioxide being released into the atmosphere in the U.S. has fallen dramatically to its lowest level in 20 years, and government officials say the biggest reason is that cheap and plentiful natural gas has led many power plant operators to switch from dirtier-burning coal." See this link: http://www.azcentral.com/business/articles/20120816ap-impact-co-emissions-us-drop-year-low.html. While it is clear that the SunZia Project was designed to

4 primarily support renewable energy generation, it is not so clear that the SunZia transmission route alternatives were located to also support energy generation

2305	Response to Comment
2	Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the Purpose & Need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way. The range of alternatives considered included potential transmission line routes that could provide electrical interconnections with renewable energy resources located primarily within the Qualified Resource Areas (QRAs) for wind energy, in south-central New Mexico, and the QRAs for solar energy located in southwestern New Mexico (e.g., BLM designated Afton Solar Energy Zone) and southeastern Arizona.
3	Upgrading existing transmission systems was considered as an alternative to new transmission, and described in Section 2.3.3.3 of the DEIS. For reasons stated in this discussion this alternative was considered but eliminated. Please also see response to Comment No. 2 above.
4	The Applicant's objectives as stated in Section 1.4 of the DEIS include "to increase available transmission capacity in an electrical grid that is currently insufficient to support the development, access, and transport of additional energy-generating resources including renewable energy, in New Mexico and Arizona." The alternatives considered would not preclude natural gas or any other generation source.

2305

4 from current or future natural gas fired utility plants. It would seem that a transmission alternative should be developed that specifically considers energy generation from natural gas, as that may be a more dominant scenario driving transmission capacity demands.

5 3. Preferred Alternative. In my view, the BLM should step back and re-assess the need for this project as currently proposed. I do not believe the substantial and extensive impacts to our public lands are currently justified by the information presented in the Draft EIS. If a decision must be made now, I recommend the No Action alternative be selected as the Preferred Alternative in the Final EIS. If the No Action alternative is not selected, I agree that the BLM's Preferred Alternative Route is the best choice among the action alternatives. Regarding Route Group 4, the Subroutes 4A and 4B have the most impact on pristine landscapes and sensitive watersheds and should be avoided. I believe BLM is correct to choose Subroute 4C2c.

Thank you for the opportunity to provide these comments. Please keep me informed as this action moves forward.

Sincerely,

//signed//

Steve Saway

2305	Response to Comment
5	Comment noted.

2313

SunZia Southwest

TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

Keith & Sue Waid
NAME
HC66 Box 608
ADDRESS
Mountainair, NM 87036
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ■ Yes ☐ No
Withhold personal information* ☐ Yes ■ No
Receive notification of EIS availability? ■ Yes ☐ No

COMMENTS:

We are opposed to the Group 1-SunZia East to Midpoint Route known as Subroute 1A1 BLM Preferred for the following reasons:

1 1)Creates a new corridor instead of following existing corridors (once a corridor is established legally it is doomed for further development and in this case more transmission lines in the future which will destroy environment and property values).

2 2)Too close to Sevilleta NMR and Bosque Del Apache NWR (cuts between both).

3 3)Construction and access roads to project will significantly disrupt environment (existing one lane roads are too fragile to sustain construction traffic; we are already innundated by WSMR traffic without any repair to roads).

4 4)WSMR too close (range is very active on north side; interaction with transmission line would be catastrophic).

5 5) Military Operating Area boundaries conflict with transmission project route (daily low flying aircraft such as helicopters, jet fighters and C-130 cargo transport planes). Reality: MO Aircraft do not operate at 1500 ft. elevation restrictions.

6 6)People of NM not intended to receive any benefit from transmission project (no power, no employment, no compensation for devaluation of property).

7 7) Too close to Salinas Pueblo Missions National Monument Gran Quivira

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2313	Response to Comment
1	Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance. Approximately 296 miles (56%) of the BLM Preferred Alternative would be parallel to existing or designated utility corridors, as stated in Section ES.3.4 and shown on Figure M10-4 Utilities of the DEIS. Future proposals for new utilities would be subject to separate evaluation and approval by the appropriate regulatory and land management agencies.
2	Comment noted.
3	Specifications for road construction and maintenance are described in Section 2.4.10.1. Existing roads would be used for Project construction where available, and improved where needed.
4	The military conducts testing and training activities in airspace surrounding WSMR and throughout southwestern New Mexico. The BLM Preferred Route (Subroute 1A1) is located 28 miles north of the WSMR, as noted in Section 4.10.6.1 of the DEIS.
5	Comment noted.
6	The potential employment and tax revenues generated by the Project in New Mexico and Arizona are described in Section 4.13.4.6.
7	The BLM Preferred Alternative is located approximately 4.5 miles north of the Gran Quivira unit of the Salinas Pueblo NM.

Sunzia comment 2012

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COMMENT FORM

U.S. Department of Interior
Bureau
of Land Management
New Mexico State Office

Draft Environmental Impact Statement and
Resource Management PlanAmendments (Mry zA12)

and Sue Waid
NAME
C 66 Box 608
Organization (if applicable)
Add tomailinglist n?"r ilNo
ADDRESS
tainair NM 87036
Withholdpersonalinformation" flYes
Receive aotifi cationl of
8f;"
CITY STATE ZIP EIS availability? DTe. C No

COMMENTS:
It is with great sadness that our society has moved to a practice in which the solving of one problem simply creates
another.We really are smarter people than that. However, some leaders in our country think less and act on impulse to "solve"
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While we do appreciate the process of environmental study (although,one single privately held company's is inappropriate
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un(Jerllocraucr, alt(.I [Ile puoilc Gomment pefloos, we uo ftot
feel that we have been given all of the information regarding the complete and ultimate intended size of this project or its true
i
wind energy is a great form of renewable energy and that it is our responsibility to accept the two 500 K lines (the largest in
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any power or revenue from this project is even more preposterous. Devaluing our property without any compensation is
un-AmeriеaR.

We do not like to be fooled. After conversations with employees of BLM and Environmental Planning Group regarding the

E-

corridor. The 6 mile "study" band (3 miles on each side of the centerline of the proposed route) is a true threat to those of us

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mile gray band is "...not a jurisdiction" it is "...to identify environment and beyond". Nice commentary, but what does it really
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initially proposed 1000 ft. right-of-way, it is doomed for more development.
Existing corridors and public utilities are old news.

Sunzia comment 2012

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refuges, and the little remaining virgin ground in the great American desert becomes a new'lexisting" corridor. Thinking about
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And now for the larger sham: wind energy. What happens when entire mesas filled with wind turbines cease to turn 20-30
years trorn ltow uecatuse urg lJilysruar ilre or ure rurutlres are lrnrsile(J a
vvill rrrere oe governlltelt(suDstQtes agatlt allq agatlt r.o
replace them? Can we afford this replacement? Furthermore, what happens to the used junk on the mesas and all the useless
lin

Attach additional pages, if needed.

SENDCOMMENTSTO:

SunZia Southwest Transmission Project I c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments usill be atailabkfor pablic rez,iest. Indfuiduals requesting tbeir personal information he asithbeldfrorn public reoieu orifrom
disclosure under the Freedom ofInformation Act must thec{ YES" in the appropriate box. Sueb requests ttsill be bonored to the extmt alloued by latt:.

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2313

Page 2

"The wind energy business is the electric sector's equivalent of the corn ethanol scam: it's an over-subsidized industry that depends wholly on taxpayer dollars to remain solvent while providing an inferior product to consumers that does little, if anything, to reduce our need for hydrocarbons or cut carbon dioxide emissions. The latest Bentek study should be required reading for policymakers. It's a much-needed reminder of how the pesky facts about wind energy have been obscured by the tsunami of hype about green energy."-*Robert Bryce, a senior fellow at the Manhattan Institute.*

We are concerned for ourselves,our neighbors, and the ultimate footprint—both physical and financial to our country. This project brings home a much larger issue, and we are glad for the process and the freedom to voice our opposition.

2313	Response to Comment
	See following page(s)

2325

From: susann white
To: BLM NM SunZia Project
Subject: Re: Proposed SunZia transmission power line route through Lower San Pedro River Valley, further remarks continued
Date: Monday, August 20, 2012 2:39:34 PM

--- On **Mon, 8/20/12, Susan M White** *<equusite@gmail.com>* wrote:

From: Susan M White <equusite@gmail.com>
Subject: Fwd: Proposed SunZia transmission power line route through lower San Pedro Valley
To: ahoofbeat@yahoo.com
Date: Monday, August 20, 2012, 12:03 PM

---------- Forwarded message ----------
From: **susann white** <ahoofbeat@yahoo.com>
Date: Mon, Aug 20, 2012 at 11:57 AM
Subject: Proposed SunZia transmission power line route through lower San Pedro Valley
To: equusite@gmail.com

1 This project must be the largest attempted land-grab of Federal land for private profit since the railroad barons in the late 1800's tried to wrest a corner of (what is now) Yellowstone National Park for a railroad to the mining districts of Montana.

Fortunately, that plan didn't succeed, and we want to make certain SunZia's plan for destruction of a pristine wilderness area in Southern Arizona doesn't either!

Perhaps we are naive to think so, but isn't the BLM charged with protecting public lands for the public good?

Since when is destroying a major international migratory bird flyway considered in the public interest?

BLM is justifying the proposed SunZia transmission line route through the lower San Pedro River Valley and into the San Manuel/Mammoth area by depicting the region as a "wasteland."

What department of BLM made such a value judgement regarding the lower San Pedro River Valley area?

This is hardly a "wasteland" to the largest diversity of mammal species of the continental United States; animals who abound along this unique desert river corridor, and which could not survive without the river.

It is not a "wasteland" to thousands of tourists who come to enjoy birding and other wildlife pursuits along the lower San Pedro River Valley.

2325	Response to Comment
	Comment noted.

2325

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2325	Response to Comment
	See following page(s)

2325

1 It is not a "wasteland" to the ranchers and businesses living and working along the river.

Portraying the area a "wasteland" is a straw dog tactic. Once BLM has assessed the area as a "wasteland", it can state a "better" use of the of the land involved is permitting installation of 300 16-storey transmission towers by SunZia..

The citizens of Southern Arizona, and Arizona generally, are being treated like third-world citizens by BLM and its corporate applicant, SunZia. The proposed transmission line route through the
lower San Pedro River Valley is like Chevron's environmental destruction in Ecuador, or Shell's massive environmental destruction in Nigeria. It's a total "who cares about the natives" attitude, reminiscent of the worst excesses of colonial exploitation.

2 The only environmentally defensible transmission power route is the Southline transmission route, which makes use of the existing power transmission routes along I-10.

SunZia has misled one and all regarding renewable energy power generation, in fact, the project contains no plans for renewable energy generation!

3 Supposedly, California was to be the recipient of the renewable energy, but California has said it not only has sufficient renewable energy, it also doesn't need the energy from SunZia.

To round out SunZia's renewable energy charade, US Air Force climate maps clearly show major solar energy sources to be along the California/Arizona border, and not any in the lower San Pedro River Valley. The Air Force climate maps also show no wind power of any significance in the New Mexico area which SunZia is proposing as a renewable energy generating region.

Now, if we can't trust the US Air Force climate assessment credibility , who can we trust? SunZia?

I think not, and neither does the public.

The Administration has been misled by SunZia; if the truth of this project were known it is doubtful the project would have been "fast-tracked". No one is against increasing Western power-generating capacity or jobs. What they are against is being "fast-tracked" themselves into an environmentally incoherent project approved by BLM, a project which would virtually destroy an international migratory bird flyway, negatively impact everything and everyone along the proposed route, and irrevocably damage, if not destroy, a heretofore pristine desert river oasis environment.

We want the lower San Pedro River Valley to remain intact for future generations, not environmentally trashed by corporate interests, especially since alternate transmission routes are available!

This means protecting the area for everyone, and future generations, not just birders (although 1/2 of the bird species found in the U.S. use the San Pedro River migratory flyway and although birds save agriculture millions of dollars per year in insect-control on food crops).

We want a project that protects and promotes the public weal, and sincerely hope that BLM can deliver a sound and acceptable power transmission route plan to this end, not an environmental nightmare.

Sincerely yours,

2325	Response to Comment
2	Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the Purpose & Need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.
3	The range of alternatives considered included potential transmission line routes that could provide electrical interconnections with renewable energy resources located primarily within the Qualified Resource Areas (QRAs) for wind energy, in south-central New Mexico, and the QRAs for solar energy located in southwestern New Mexico (e.g., BLM designated Afton Solar Energy Zone) and southeastern Arizona. The Applicant's objectives as stated in Section 1.4 of the DEIS include "to increase available transmission capacity in an electrical grid that is currently insufficient to support the development, access, and transport of additional energy-generating resources including renewable energy, in New Mexico and Arizona."

2325

Susan M. White
P.O. Box 87786
Tucson, AZ 85754

(520) 822-1289

Member
Tucson Audubon Society

2325	Response to Comment
	See following page(s)

2329

From: sylvia knight
To: BLM NM SunZia Project
Subject: Comments on SunZia DEIS & Resource Management Plan Amendments, August 21, 2012
Date: Tuesday, August 21, 2012 12:47:35 PM

Dear Mr. Garcia:

Considering earlier comments from Friends of the Bosque and others, I find it deeply disappointing that SunZia persists in proposing overhead routes across the Rio Grande between Bosque del Apache and Belen, especially when suggested alternatives do not receive full assessment.

My husband and I have spent time in Socorro, NM in January for several years. We value the desert experience of open space inhabited by creatures that manage to live in difficult conditions, a lesson for all of us. We value spending time amongst the migratory birds -- sandhill cranes, snow geese, ducks -- that seek winter refuge at the Bosque del Apache, and know that eagles and hawks live there year-round. We appreciate the small communities that welcome us each January, whose citizens deserve to live without a huge transmission line taking their land and degrading their community's means of livelihood. We can see the cranes grazing among cattle in the fields north of Socorro, and walk in the bosque area east of Socorro where cranes land in the river in small groups, conversing with each other and working the stream in the early evening. The wildlife, scenic, social and economic fabric of the area would be seriously degraded by installing 2 overhead high-voltage transmission lines north of Bosque NWR and south of Belen. [1]

I am troubled that the BLM and SunZia are not taking seriously the risk to birds that use the Rio Grande flyway daily in their search for food. It is unfortunate that even after the 2010 evaluation, routes that would create this serious risk have not been removed from consideration, and routes that avoid such impacts have not had full consideration. The prospect of two sets of huge transmission lines trapping and killing cranes and other birds is too painful to contemplate and violates the very purpose of the Bosque del Apache National Wildlife REFUGE. [2]

As a contributor to land conservation efforts in Vermont and New Mexico, I find it troubling that BLM and SunZia have not considered the value of land conservation efforts to protect the bosque ecosystem between Bernardo and the Bosque, or the adverse impacts of the huge transmission project on such efforts that bring citizens, nonprofits and governmental agencies together for the common good. [3]

I find it troubling that BLM and SunZia have not given full consideration to the irrevocable environmental and economic damage and injustice this project would visit upon the communities of Socorro and San Antonio, with no long-term benefits, when other possible routes exist. [4]

I support the comments of Leigh Ann Vradenburg, Executive Director of Friends of the Bosque National Wildlife Refuge, urge your full attention to them, and urge BLM and SunZia to abandon any proposed overhead routes between the Bosque and Belen, NM. [5]

Thank you for considering my comments.

2329	Response to Comment
1	Comment noted.
2	The results of the avian collision risk study, including estimates of annual mortality, are presented in Appendix B-2 of the DEIS. The results of the study indicated that, with mitigation measures such as bird diverters, the collision risk would likely be low. An Avian Protection Plan will be developed, and will provide details on the selection and placement of mitigation measures such as bird diverters, as well as potential design modifications to minimize the collision risk.
3	Comment noted.
4	Comment noted.
5	Comment noted.

2329	Response to Comment
	See following page(s)

2329

Sylvia Knight

--
Sylvia Knight
Earth Community Advocate & Researcher
273 Lynrick Acres
Charlotte, VT 05445
sknight@gmavt.net
802-425-2068
Specialty in Biocide issues

"When we forget that we are embedded in the natural world, we also forget that what we do to our surroundings we are doing to ourselves."
David Suzuki, 1997
"...We need to understand how the human community and the living forms of Earth might now become a life-giving presence to each other."
Thomas Berry, 1999

2400

SunZia Southwest
TRANSMISSION PROJECT

RECEIVED
AUG 2 9 2012

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME: Michael Hendrix
ADDRESS: 500 Bosquecito Road
CITY: San Antonio, STATE: N.M. ZIP: 87832

Organization (if applicable)
Add to mailing list ☐ Yes ☐ No
Withhold personal information* ☐ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☐ No

COMMENTS:

1 For the sake of migratory birds that winter at Bosque de Apache, I would like to see the power lines crossing the River north of Socorro. To make the lines less disruptive to wildlife, why not carry them across the river in a raised viaduct? Doing so could provide a mile-wide gap in the aerially suspended liner that might make it a whole lot safer for migrating birds. When taken in context of the potential financial yield of the project, The extra cost would not be that significant.
(Please see attached)

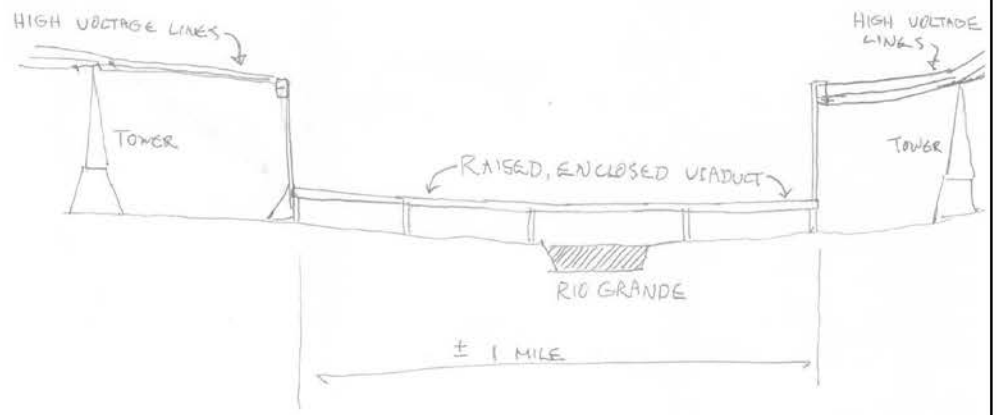
Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2400	Response to Comment
1	The preferred route crossing the Rio Grande is currently north of Socorro, in the approximate area described. Creating a mile-long electrical viaduct is not an engineering alternative at this time.

2400



2415

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME: Harold Bob Lackner
ADDRESS: 3003 Coronado Ave
CITY: Willcox, STATE: Az ZIP: 85643

Organization (if applicable)
Add to mailing list ☐ Yes ☐ No
Withhold personal information* ☐ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☐ No

COMMENTS:

Link C170 - near Klondyke
Link B153b - near Safford

1 I have cattle ranches with deeded and mostly state so I would prefer to not have the lines go South of Safford and on out thru Klondyke - the Safford ranch is already getting a freeway thru it and if it did go thru here (S. of Safford) it would be best kept along the existing powerlines R of way in lower country we have an very

2 noxious weed sweet resin bush out of S. Africa that I have spent $150,000 on and have gotten grants for around $300,000 plus and it is scattered all along the North side of Mt Graham & with its pretty flower people would spread it along with the seed also I don't need any more 4 wheeler trafic taking off of the Powerline road in all I prefer the Benson San Pedro route Please keep me informed ways

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

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2415	Response to Comment
1	The BLM preferred alternative does not include links C170 and B153b.
2	Treatment of noxious weeds and other invasive plants is discussed in Appendix B-2 of the POD.

2416

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME [redacted]
ADDRESS
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ☐ Yes ☒ No
Withhold personal information* ☒ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☒ No

COMMENTS:

Routes which travel through the San Pedro Valley from SW to NE (the BLM prefered route) would require construction for many miles where either no roads exist, or where small dirt roads exist. The impact of heavy construction in this region would seriously damage the roads. The traffic, dust, and noise during construction and maintenance would ruin the rural lifestyle people in this area have enjoyed for decades. 1

Who would pay for road improvements and damage? Have impacts of construction been considered in effects on residential areas, or merely "visual impact"? 2 3

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2416	Response to Comment
1	Comment noted.
2	The applicant or owner's representatives will be responsible for implementation of the mitigation measures described in Section 2.4.12 of the DEIS, as a stipulation of the right-of-way grant.
3	Impacts to residents affected by construction have been considered as part of the DEIS, including air quality (Section 4.2) and noise (Section 4.15) in addition to visual (Section 4.9).

2417

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME [redacted]
ADDRESS
CITY STATE ZIP

Organization (if applicable)
Add to mailing list ☐ Yes ☑ No
Withhold personal information* ☑ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☐ No

COMMENTS:

1 The BLM considers the EIR of each proposed project separately. This is a mistake. The BLM fails to consider the cumulative effect of multiple projects proposed simultaneously. Currently, two high-voltage power transmission lines are proposed for the Middle San Pedro River Valley. Of these, Sun Zia is vastly more detrimental to the environment. Of concern is how this project crosses the valley longitudinally rather than transversely.

2 Also, Sun Zia will require more new construction, and more new roads. New roads lead to new incursions by OHVs, and introduction of non-native plants, in addition to destruction of habitat in one of the Southwest's most important bird areas.

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2417	Response to Comment
1	The EIS considers other projects under consideration in the Cumulative Impacts section.
2	Section 4.6.2 of the DEIS discusses potential impacts to biological resources.

2427

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME: ELIZABETH WEBB
ADDRESS: PO BOX 952
CITY: VAIL STATE: AZ ZIP: 85641

Organization (if applicable)
Add to mailing list ☐ Yes ☐ No
Withhold personal information* ☐ Yes ☐ No
Receive notification of EIS availability? ☐ Yes ☐ No

COMMENTS:

1 1.) BLM has the discretion to deny, please be sure to include the no-action alternative when telling the public the alternatives. Also, doesn't NEPA require agencies to ~~analyze~~ consider the no-action alternative - shouldn't the public be made aware of this during presentations?

2.) Extend public comment period to include ~~hearings~~ hearings accessible to folks in each alternative + the necessary for subroutes.

3.) General request to BLM - Please make the website more accessible to members of the public + rural users. See attached

2 4.) Please show access roads + associated disturbance on simulations. Might be a more accurate portrayal(s) of the impacts (at future meetings)

5.) Pinal Central to Tortalita (SP?) has already been certificated, to my understanding, by the ACC. It is slightly more than planned

Additional pages if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2427	Response to Comment
1	As stated in Section 2.3.1 of the DEIS the No Action Alternative was described according to BLM and CEQ regulations, and the effects of the No Action Alternative were described in Chapter 4.
2	Comment noted. (Note: 4-access roads are illustrated in simulations).

2427

2 6.) RMP's should not be continually amended to accomodate environmental pollutors. It casts doubt that lands with high resource value will be protected in other cases. An example is the Ray Mine land Exchange + offered parcels and how well they will be protected.

FOLD HERE

FROM

First Class Postage Required

SunZia Southwest Transmission Project
c/o EPG, Inc.
4141 North 32nd Street, Suite 102
Phoenix, AZ 85018

2427	Response to Comment
	See following page(s)

2427

SunZia DEIS Volume I http://www.blm.gov/nm/st/en/prog/more/lands_realty/sunzia_southw...

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

Volume I - Draft EIS

DEIS and RMP Amendments for the SunZia Southwest Transmission Project

SunZia_DEIS_May_2012_00.Dear_Reader_Letter.pdf	4323 Kb	05/25/2012
SunZia_DEIS_Volume_I_01.Executive_Summary.pdf	7975 Kb	05/25/2012
SunZia_DEIS_Volume_I_02.FrontMatter.Refs.Glossary.Index.pdf	4473 Kb	05/25/2012
SunZia_DEIS_Volume_I_Chapter_1.pdf	3651 Kb	05/25/2012
SunZia_DEIS_Volume_I_Chapter_2.pdf	32944 Kb	05/25/2012
SunZia_DEIS_Volume_I_Chapter_3.pdf	3901 Kb	05/25/2012
SunZia_DEIS_Volume_I_Chapter_4.pdf	9187 Kb	05/25/2012
SunZia_DEIS_Volume_I_Chapter_5.pdf	2094 Kb	05/25/2012

Last updated: 06-04-2012

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3 Break this down into separate files with identifiers to show information - similar to what is done in Section 1.5 scoping + public comments Table 1-3 "Summary of Issues from scoping".

EPA did this for the Rosemont Copper/TEP case and it made the information more readily available to the public

1 of 1 7/17/2012 2:07 PM

2427	Response to Comment
3	The files that are accessible on the website include each chapter of the DEIS; Table 1-3 is included in Chapter 1.

Pursuant to FERC Order 888, it is noted that the locations of individual proposed projects or transmission line interconnections cannot be identified to third parties by transmission owners.

1.5 SCOPING AND PUBLIC INVOLVEMENT

The EIS process was formally initiated on May 29, 2009, with a publication in the *Federal Register* of the Notice of Intent (NOI) to prepare an EIS. Publication of the NOI also marked the beginning of a 45-day public scoping period, during which time nine public scoping meetings were held. In response to public comments, the Project study area was expanded twice, and additional scoping periods and public meetings were held in October 2009 and April 2010. Overall, approximately 500 people attended the three sets of scoping meetings and approximately 1,400 comment submittals were received. The scoping process is described in detail in Chapter 5 of this EIS, and in the *SunZia Southwest Transmission Project EIS Scoping Report* (Scoping Report), which is available on the BLM Project website[1].

The intent of scoping is to identify important issues related to a proposed action and its alternatives. The identification of issues helps agencies to focus their analysis and often facilitates in the development of alternatives. During Project scoping, issues related to engineering and design, land use and recreation, social and economic conditions, and biological, visual, cultural, and earth and water resources were identified and used to locate, refine, and evaluate alternative routes and substation sites. Table 1-3 provides a representation of issues identified during scoping, and indicates where these issues are addressed in the EIS. A complete summary of issues identified during scoping, including those issues that are not addressed in the EIS, is provided in the Project Scoping Report (BLM 2010b).

Table 1-3. Summary of Issues from Scoping

Issues	Where Addressed in EIS
Project Engineering and Design • Issues with engineering and construction constraints, including construction on mountainous terrain, proximity to gas lines and other hazards, and line burial	Chapter 2, Section 2.4.12 Chapter 3, Section 3.3 Chapter 4, Section 4.3
Corridor Alignment and Alternatives • Concerns regarding routes in and near to the following areas (for various resource concerns): Eloy, San Pedro River Valley, Galiuro Wilderness, Sunset Mountain, Sulphur Springs Valley, Aravaipa Valley/Klondyke, Cluff Ranch, Mt. Graham/Safford, US Route 191 south of Safford, Deming, Bosque del Apache National Wildlife Refuge/San Antonio, and Rio Grande Corridor, WSMR, Fort Bliss, Buffalo Soldier Electronic Proving Ground*	Chapter 2, Sections 2.2, 2.3 Chapter 3, all Chapter 4, all
Earth and Water Resources • Increase of sedimentation in rivers • Potential impacts from soil erosion • Alteration of watersheds and associated habitat and wildlife	Chapter 3, Sections 3.3, 3.5, 3.6 Chapter 4, Sections 4.3, 4.5, 4.6

[1] www.blm.gov/nm/st/en/prog/more/lands_realty/sunzia_southwest_transmission.html

Table 1-3. Summary of Issues from Scoping

Issues	Where Addressed in EIS
Biological Resources • Impacts on wildlife habitat, particularly on raptor nesting habitat • Impacts on migratory birds and waterfowl near the Rio Grande corridor and Bosque del Apache National Wildlife Refuge • Impacts to Sandhill Cranes through Sulphur Springs • Impacts to Chihuahuan Desert and Nutt Grasslands • Invasive and noxious weed species and mitigation measures • Habitat loss and fragmentation • Wildlife mortality associated with construction activities and vehicle traffic • Creation of avian collision hazards • Increased public access on access roads • Impacts to Aravaipa Canyon and fish (Spikedace and Loach Minnow are federally threatened fish located in Aravaipa creek), bird, tortoise, and Bighorn Sheep species that exist in its watershed • Impacts to Silvery Minnow in the Rio Grande • Impact on breeding habitat for Southwestern Willow Flycatcher	Chapter 3, Section 3.6 Chapter 4, Section 4.6
Cultural Resources • Potential impacts on cultural resources, including prehistoric and historic sites, historic structures and trails, cemeteries, national parks and monuments, and state parks • Impacts to archaeological sites in San Pedro River Valley and Aravaipa Valley along the Rio Grande • Concern regarding San Pedro River Valley as a "low" sensitivity area • Religious significance of Sunset Mountain	Chapter 3, Section 3.8 Chapter 4, Section 4.8
Tribal Concerns • Tribal values, traditional cultural properties • Impacts on tribal ruins, burial grounds, plant gathering, and traditional use areas near Mt. Graham and Safford • Impacts to tribal pueblo ruins along the Rio Grande	Chapter 3, Section 3.8.4 Chapter 4, Section 4.8
Visual/Scenic Resources • Impacts to sensitive viewing areas, including travel routes, National Park and Monument units, recreation areas, residences, and the aesthetic values in San Pedro River Valley, Aravaipa Canyon, Socorro Valley, Picacho Mountains, Coronado National Forest, US Route 191 south of Safford	Chapter 3, Section 3.9 Chapter 4, Section 4.9
Land Use and Recreation • Conflicts with current land use plans • Impacts to wilderness areas (including Bosque del Apache Wilderness Area and Galiuro Mountains) for recreationists and wildlife • Impacts to livestock grazing and ranching • Impacts to property values • Conflicts with increased off-highway vehicle use along construction access roads • Conformance with municipal/county general plans and master plans • Impacts to rangeland infrastructure • Impacts to military training, testing, and the operational readiness of the White Sands Missile Range, Holloman AFB, Fort Bliss, and Fort Huachuca (Buffalo Soldier Electronic Proving Ground)	Chapter 3, Sections 3.10, 3.11, 3.12 Chapter 4, Sections 4.10, 4.11, 4.12

2428

SunZia Southwest
TRANSMISSION PROJECT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME: Martin Ward
ADDRESS: 9212 E. Palm Tree Dr.
CITY: Tucson STATE: AZ ZIP: 85710

Organization (if applicable)
Add to mailing list ☒ Yes ☐ No
Withhold personal information* ☐ Yes ☐ No
Receive notification of EIS availability? ☒ Yes ☐ No

COMMENTS:

1 Interested in map detailing Eureka Springs Area between Bonita and Klondyke AZ.

Attach additional pages, if needed.

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2428	Response to Comment
1	The Map Volume includes detailed maps of Eureka Springs area within the study corridor, and the interactive map viewer located on the BLM SunZia website provides additional detail.

2433

SunZia Southwest
TRANSMISSION PROJECT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

COMMENT FORM

U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office

Draft Environmental Impact Statement and Resource Management Plan Amendments (May 2012)

NAME: Bonnie Poulos
ADDRESS: 1208 E. Shoot Dr.
CITY: Tucson, STATE: Az ZIP: 85719

Organization (if applicable)
Add to mailing list ☒ Yes ☐ No
Withhold personal information* ☐ Yes ☒ No
Receive notification of EIS availability? ☒ Yes ☐ No

COMMENTS:

The "Preferred" Route Is Unacceptable! The Area You Are Proposing To Alter Is One Of The Only Unfragmented Wilderness Areas In Arizona. It Is Too Costly And There Are Other Routes And Plans (Primarily, South-Line) That Make Much More Sense. This Is Not An Alternative Energy Project & To Try To Sell It As Such Is Insulting To The Public. How Much Of The Power Along This Line Will Be Renewable 5 Yrs After Completion? 1

None Of The Routes Shown On Your Maps Use Existing Corridors As Was Asked For By Many In The Public Sector. As A Result, I Am Now Opposed To The SunZia Project In Its Entirety & Will Work To See That It Does Not Get Funded. Lastly, 2

~~Also~~ I Am Offended Beyond Belief That You Have Armed Officers Present At Our Local Public Meeting. I Ask That BLM Hold A Public Hearing So We Can Publically Discuss These Issues. Bonnie Poulos

Attach additional pages, if needed.

SEND COMMENTS TO: SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2433	Response to Comment
1	As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Transmission facility services are to be provided on a nondiscriminatory, comparable basis to others seeking similar services, including ancillary services..." and reiterated on p 4-274 of the DEIS, "As previously discussed, FERC Order 888 compels transmission owners to provide open access to its facilities without discrimination, including discrimination as to type of generation requesting interconnection and transmission service." Although FERC rules do not allow for discriminatory preference among generation subscribers to a transmission line, "it is the intent of the Applicant to provide infrastructure to increase transmission capacity in areas of potential renewable energy generation" (see DEIS, p.1-8). Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.
2	Where available, portions of the route would follow existing utilities or other roads that would provide access for construction and maintenance. Approximately 296 miles (56%) of the BLM Preferred Alternative would be parallel to existing or designated utility corridors, as stated in Section ES.3.4 and shown on Figure M10-4 Utilities of the DEIS.

2443

Received 8-24-12 at BLM NMSO AHG

Steven Slaff
2108 E Lind Rd
Tucson AZ 85719-2445

(1)

20 Aug. '12

Bureau of Land Management - New Mexico State Office
Attn: SunZia Southwest Transmission Project
P.O. Box 27115
Santa Fe, New Mexico 87502

Dear Madame or Sir:

1 Please support the "No Action" alternative for the proposed SunZia Transmission Line project. It is ill-advised for so many reasons I can only mention a few here:

2 1) The proposed route would occupy the San Pedro River Valley. This is where the very last Southwestern U.S.A. perennial river that has not been dammed flows. A larger variety of mammal species live along this river than along any other American river, including those in Alaska and Hawai'i. Construction of the power lines will irreversibly harm many of the species. Although you hear more about the Rio Grande River and its valley, the San Pedro River hosts considerably greater species diversity.

3 2) Federal and local officials oppose the plan (for good reason) but they are being drowned out by support for the plan from

2443	Response to Comment
1	Comment noted.
2	The DEIS discusses the presence of high mammal diversity, large blocks of habitat, and notes the potential presence of a number of special-status species in the San Pedro River Valley.
3	Comment noted.

2443

(2)

3 officials of the Obama administration. Those officials are not familiar with the details of the plan. They have merely seized on the belief that a substantial proportion of the electricity carried by the lines will be generated from renewable resources. This is very unlikely to occur within the design life of the project. Thus, they are blindly supporting the project assuming that it will achieve noble goals, while not realizing the extensive environmental damage it will cause nor the unrealistic economic predictions used to falsely justify it. Which leads me to the third reason.

4 3) The financial footing of the project is in serious doubt. The electricity-generating facilities on which the economic viability of the project depends do not exist. If they are ever built, it may be too late for them to ever render the project viable. Not a single consortium nor company plans to build renewable energy generating facilities in a location capable of supplying electricity to the proposed SunZia power lines.

5 4) No market exists or is likely to exist in the future for electricity that the project would transmit. The idea is that generating facilities in New Mexico would sell

2443	Response to Comment
4	The list of planned renewable energy projects is provided in Table 4-31 in Section 4.17.3.2 of the DEIS have been identified within the cumulative area of analysis. Planned projects could interconnect with the SunZia Project, although the timing of project development is uncertain.
5	Recent projections from the Western Electricity Coordinating Council (WECC) in a table titled, “2022 Common Case Loads and RPS Requirements in WECC Region, Modified as needed for DG Assumptions” (http://www.wecc.biz/committees/BOD/TEPPC/20120106/Lists/Minutes/1/2022%20Renewables_FINAL_20120206.xlsx last visited October 2, 2012) show that approximately 55,765 GWh of new renewable generation will need to be added to the WECC Region (i.e., California, Nevada, Arizona, and New Mexico) between 2011 and 2022 in order to meet RPS.

2443

(3)

5 electricity to buyers in Arizona and California. However, both Arizona and California buyers have announced plans to buy electricity from renewable sources from producers within their own state.

6 5) The Southline Project, which is closer to completion, will accomplish (sooner) many of the same goals as the SunZia project. It will do so with less financial risk and less destruction of animals, plants, and land.

For these reasons and others that I don't have the space to list, I fervently request that you take a long, hard, realistic look at the pros and cons of the SunZia project, and then favor the "NO ACTION" alternative.

Please inform me of your chosen alternative and any future opportunities that I will have to make suggestions.

Thank you for your help.

Very truly yours,

Steven Aloff

2443	Response to Comment
6	Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the Purpose & Need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.

2447

2018 W. Los Reales Road
Tucson, AZ 85746
August 18, 2012

Bureau of Land Management
New Mexico State Office
Attention: SunZia Southwest Transmission Project
P. O. Box 27115
Santa Fe, NM 87502-0115

Received 8-20-12
at BLM NMSO
Arrowa

Dear Bureau of Land Management:

I am writing to support the No Action Option for SunZia. The SunZia electric transmission line as proposed and described in the draft Environmental Impact Statement should not be built.

In proposing multiple diverse routes, SunZia is trying to set opponents against each other. I have a few comments to make about the BLM preferred alternative route, since it is closest to the areas I know best. Just because I am writing about one route, I repeat: This is a transmission line that should not be built anywhere.

1 Habitat fragmentation is a well known threat to ecosystems. The BLM preferred route will cut a 30 mile long zone west of the San Pedro River and parallel to it. This location would place the power line between the San Pedro Riparian Corridor and the Rincon and Saguaro Wilderness areas. It will fragment an area that is the largest unfragmented landscape in Arizona outside of the Grand Canyon.

Local residents have spend decades protecting wildlife corridors from the Galiuro Wilderness to the east across the San Pedro River to the Rincon/Saguaro Wilderness to the west. The BLM preferred route would cut these corridors between the river and the Rincon wildernesses. In addition to federally protected wildernesses in the highlands, local ranchers have maintained the landscape with little fragmentation.

BLM itself has gone to great lengths to protect the Hot Springs Canyon Corridor. The Muleshoe Ecosystem Management Plan (BLM/ AZ/PL-98/024) establishes a joint management arrangement between the BLM and The Nature Conservancy to protect the land east of the San Pedro River including the Hot Springs Canyon wildlife corridor. The land west of the San Pedro has many of the same values found in the Plan area. It is also in need of protection and careful management. The fact that this land is largely Arizona State Trust land makes it no less valuable.

In closing I ask that BLM chose the No Action option and avoid the mistake of letting SunZia build a damaging, unnecessary power line that would degrade and fragment an ecosystem that is a rare treasure.

Sincerely,

Nancy Ferguson

Nancy Ferguson

2447	Response to Comment
1	Section 4.6.2 of the DEIS discusses potential impacts to biological resources. Although the BLM preferred alternative would cross wildlife movement corridors, no information indicates that those corridors would cease to function as a result.

2453

2453

COMMENTS ON THE SUN ZIA PROJECT

THE PREPARATION OF THE EIS TOOK OVER 2 YEARS AND AT LEAST 100 PEOPLE TO PREPARE.

1 WHY WERE NOT THE PROPERT OWNERS DIRECTLY AFFECTED NOTIFIED WHEN THE STUDY WAS PUBLISHED IN THE FEDERAL REGISTER?

A MEETING WAS HELD IN SOCORRO ON JUNE 27. I DID NOT RECEIVE A COPY OF THE EIS UNTIL JULY 5TH

2 HOW DO YOU EXPECT A PROPERTY OWNER TO ABSORB AND REPLY TO 3 VOLUMES OF INFORMATION ONLY 44 DAYS BEFORE THE DEADLINE?

IN YOUR MAPS OF ALTERNATIVE

3 ROUTES, WHY DID YOU NOT SHOW THE ONES THAT WENT ALONG THE NATURAL GAS CORRIDOR TO HIWAY 60 AND CROSSED THE RIVER AT BELEN AND?

WSMR HAS STATED THE PROPOSED ROUTE WOULD IMPACT THEIR MISSION.

4 WHO IN THE BLM HAS THE EXPERTISE TO MAKE THE DETERMINATION THAT THE POWERLINE IS OF MORE IMPORTANCE THAN NATIONAL DEFENSE?

AT 4.10.6.2 YOU DISCUSS POSSIBLE EFFECTS ON FIRINGS TO THE POWERLINE BUT ONLY ONE VAGUE SENTENCE OF EFFECTS TO THE MILITARY. WHY DIDN'T YOU EXPLAIN WHAT THOSE IMPACTS WOULD BE AND HOW THEY WOULD BE HANDLED?

RECEIVED
BLM-MAILROOM
STATE OFFICE
SANTA FE, NEW MEXICO
2008 AUG -5 AM 11:01

2453	Response to Comment
1	The routes depicted in the DEIS are centerlines of alternative study corridors. Parcel locations have not been identified; individual property owners would be notified when the final location of the proposed 500 kV transmission lines is determined following surveys and engineering.
2	Comment noted.
3	Several routes were illustrated on Figure 2-7 of the DEIS that were considered and eliminated.
4	The United States Army White Sands Missile Range and the Department of Defense are cooperating agencies, and have been involved in the scoping and planning of this project. These agencies have indicated that potential impacts from new transmission lines would vary according to the location of military testing and training missions.

2453

YOU USED YOUR VISUAL IMPACT SCORES TO DIMINISH THE FACT THAT THE CHOSEN ROUTE WOULD BE BETTER. WHERE MY HOUSE SITS WE HAVE AN UNOBSTRUCTED VIEW OF THE GALLINAS MOUNTAINS AT CORONA THE CAPITAN MTN., SIERRA BLANCA, THE OSCURAS AND THE MAGDALENAS. THE LINE COMES BETWEEN OUR HOUSE AND ALL OF THOSE AND AT ONE POINT IS LESS THAN A MILE FROM OUR FRONT DOOR.

YOU SHOWED PICTURES IN YOUR VISUAL IMPACT SECTION FROM ONE WELL ON OUR RANCH AND ONE AT THE DONALDSON RANCH WHERE YOU CAN ONLY SEE PART OF ONE TOWER AND PART OF THE LINE. IF YOU MOVE 200 YARDS FROM EITHER SITE YOU ARE ABLE TO SEE FROM 4 TO 6 MILES OF THE LINE. DO YOU REALLY FEEL THAT YOUR VISUAL REPRESENTATION WAS ACCURATE.

5

AT 4.13.2.1 YOU DISCUSS SIGNIFICANT IMPACTS BUT THERE IS NO MENTION OF THE IMPACTS ON THE INDIVIDUAL PROPERTY OWNER. WHY NOT?

6

AT 4.13.4.1 YOU DISCUSS ECONOMIC IMPACTS, BUT ONLY ON THE CITY, COUNTY & STATE LEVEL. THE ONLY MENTION OF INDIVIDUAL IMPACTS IS AT PAGE 4-218. THERE YOU STATE THAT IMPACTS ARE GENERALLY LESS THAN 10% OF THE VALUE OF THE PROPERTY. THAT MEANS THERE WERE

2453	Response to Comment
5	Impacts to residences within the immediate foreground of the Project are anticipated to be high because views would be primarily unobstructed. For the DEIS, simulation locations were selected to show a range of impacts to viewing locations including residences, recreation areas, and travel routes throughout the study area.
6	Each individual residence is mapped and was considered in the impact assessment of this DEIS.

2453

7 IMPACTS GREATER THAN 10%. WHAT WERE THOSE THAT WERE HIGHER AND UNDER WHAT CONDITIONS?

8 IF THE LINE IS BUILT AND THE LAND OWNER AGREES TO IT WHAT KIND OF LIABILITY DOES THE LAND OWNER ASSUME? THAT IS NOT ADDRESSED IN THE STATEMENT.

9 IN SECTION 2.4.1D.1 YOU ADDRESS ROADS. HOW CAN YOU MAKE A DECISION ON THE ISSUE IF NO SURVEY HAS BEEN DONE?

10 ALSO IF THE ROADS ARE BUILT WHY DID YOU NOT ADDRESS THE IMPACT OF TRESPASS ON PRIVATE PROPERTY AND HOW THAT WOULD BE CONTROLLED? IF THAT IS TO BE DONE DURING THE EASEMENT PROCESS, WHAT PROTECTION DOES THE PROPERTY OWNER HAVE? WHO IS TO ENFORCE THE PROTECTION FROM TRESPASS AFTER THE LINE IS BUILT? THE BLM? THE COUNTY SHERIFF?

11 WE HAVE 2 CONTRACTS WITH WSMR, ONE FOR AN OPTICS AND RADAR SITE FOR LC 94, AND THE OTHER IS AN IMPACT SITE FOR THE ATACMS PROGRAM. THE CHOSEN ROUTE IS BETWEEN OUR RADAR SITE AND LC 94. IF WSMR CANCELS OR DOESN'T RENEW THE CONTRACT, WILL THE POWER LINE COMPANY REIMBURSE US FOR THAT LOST INCOME.

2453	Response to Comment
7	As reported in Section 4.13.4.5 of the DEIS, studies published between 1992 and 2010 were reviewed which addressed potential effects to property values in proximity to transmission lines. As noted the effects generally resulted in a 10 percent or smaller reduction in property values. However, the actual property value effects that may result from the SunZia Project will vary according to individual site conditions.
8	On private lands, the Applicant or owners' representative would negotiate the terms and amount of compensation with individual property owners for right-of-way acquisition.
9	BLM's decision is "whether to grant, grant with conditions, or deny the application for new right-of-way…," and if right-of-way is granted, "BLM also will decide which alternative to select, any mitigation requirements, and the terms, conditions, and stipulations of the grant" as indicated in Section 1.10.1 of the DEIS. A preliminary study was conducted to identify for potential access road locations, but a more detailed survey will be conducted after the NEPA process.
10	Private property laws would continue to be enforced under local authority.
11	The centerline of the study corridor for the BLM Preferred Alternative (Subroute 1A1), is located approximately 2 miles north of the LC94 missile launch site. As noted in Section 4.10.6.2 of the DEIS, WSMR has stated that potential missile launch malfunctions could create a higher risk of potential damage to the transmission lines. The BLM is not a party to the contract between WSMR and a private owner for the use of private property for military operations.

2453

11 THE MAP I HAVE SHOWS THE PREFERRED ROUTE PASSING THRU THE IMPACT SITE. WERE YOU EVER AWARE OF THIS? THE QUESTION IS AGAIN, WILL WE BE COMPENSATED FOR THAT LOSS OF INCOME?

12 HOW WILL THE LINE AFFECT THE MILITARY FLIGHTS OUT OF KIRTLAND AIR FORCE BASE? WHO CONTROLS THE AIR SPACE WITHIN THE FIX AREA? THE ARMY OR THE FAA?

13 IF YOU REQUIRE LIGHTS ON THE TOWERS IN THAT CORRIDOR, WHY DID YOU NOT ASSESS THE FACT THAT THEY WILL BE SEEN EVERY NIGHT BY THE LOCALS BUT AS FAR SOUTH AS HIWAY 30?

14 IF SUNZIA USES ANOTHER CORRIDOR OWNED BY ANOTHER COMPANY DO THEY HAVE TO PAY FOR THAT USE, AND IS IT A YEARLY PAYMENT? WHY WAS THIS NOT ADDRESSED IN THE ECOMIC SECTION?

15 IF YOU HAVE SURVEYED ONLY 10% OF THE CULTURAL IMPACT OF THE ROUTE, HOW CAN YOU MAKE A DETERMINATION OF THE EFFECT?

2453	Response to Comment
12	The FAA controls the restricted airspace to allow military training operations. As stated in Section 4.10.6.2 of the DEIS, "in order to avoid potential collisions with transmission line(s)…pilots would have to adjust the flight altitudes for their low-level training missions…"
13	Lighting on towers would only be required if tower heights exceed 200' due to FAA regulations. The maximum height anticipated for the Project is 170 feet. Although detailed engineering will not be finalized until a route is selected, structures are not anticipated to exceed 200 feet and therefore would not require lighting.
14	Any right-of-way would either be purchased from private owners, or leased from government land management agencies.
15	Based on cultural resource data acquired through previous surveys, potential impacts to cultural resources were estimated for purposes of the DEIS analysis. However, a determination of effect would be made after final right-of-way has been identified and intensive archaeological surveys are completed for the proposed Project.

2453

I HAVE SEEN A CRITIQUE OF THE PROPOSED SUN ZIA PROPOSAL IN RELATION TO PROPOSED SOUTHLAND PROJECT IN SOUTHERN NEW MEXICO.

16 DID THE BUREAU HAVE ANYONE CAPABLE OF ASSESSING OR COMPARING THE TWO PROPOSALS? IF SO WHO AND WHAT WERE THEIR CREDENTIALS OR DID SUN ZIA PREPARE YOUR RESPONSE TO THAT ALTERNATIVE?

17 WILL THE BUREAU MONITOR THE CLAIMS MADE IN THE EIS AS TO THE NUMBER OF LOCAL JOBS CREATED AND THE ECONOMIC IMPACTS ON THE CITY, COUNTY, AND STATE? IT WOULD BE USEFUL IN FUTURE SITUATIONS. DOES THE BLM HAVE ANY PLANS TO MONITOR THIS? AS FOR ENVIRONMENTAL DAMAGE, IT WOULD SEEM IMPORTANT TO DO SO.

IN CONCLUSION, WE WOULD LIKE YOU TO KNOW, YOU WILL HAVE DESTROYED OUR SOLITUDE, RUINED ONE OF THE BEST VIEWSHEDS IN THE STATE, CAUSED US SERIOUS TRESPASS PROBLEMS, AND SERIOUSLY DIMINISHED THE VALUE OF OUR PROPERTY.

2453	Response to Comment
16	The Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way. An independent third-party contractor conducted the impact analysis and prepared the EIS based on project information supplied by the proponent and the resource management guidelines of public lands possibly affected by the project. A list of preparers and credentials are located in Chapter 5 of the DEIS.
17	As stated in Section 2.4.12 of the DEIS, the BLM will designate a Compliance and Inspection Contractor who would be responsible to ensure that the applicant and the construction contractor(s) meet the intent of the mitigation measures. The BLM would not monitor future employment as a result of the Project.

2457

RECEIVED
B.L.M.-MAILROOM
2012 JUN 13 PM 2:38
STATE OFFICE
SANTA FE, NEW MEXICO

June 10, 2012

Bureau of Land Management
New Mexico State Office
Attention: SunZia Southwest Transmission Project
P.O. Box 27115
Santa Fe, NM 87502-0115

Dear Ma'am/Sir,

I have received a copy of the Draft Environmental Impact Statement for the SunZia Project, and I wish to comment on it. As things stand now, I am completely against this project. I would like to take this opportunity to let you know several of reasons why I feel the project should be rejected.

1 First of all, there is the location. I am concerned especially about Cochise County portion. The project would create a new corridor in the San Pedro River Valley, along with a road, for at least thirty miles. Doing this is unconscionable, especially considering that there is already a corridor that could be used, if the project were a good one, along Interstate 10. Much less environmental damage would be caused by using the I-10 corridor. Going through the San Pedro River Valley would result in injury to the animals and plants of this region, which is why many valley residents, ranchers, conservationists, and political representatives object to it. In fact, there are three different conservation initiatives in relation to the San Pedro Valley that conflict with this route. These include an America's Great Outdoors initiative, a joint Natural Resources Conservation Service and U.S. Fish and Wildlife Service Working Lands for Wildlife Habitat Initiative, and a Fish and Wildlife Service wildlife refuge and collaborative conservation initiative.

2 In addition, it is not at all clear that the SunZia project is even needed. Another project, called the Southline Project, has the same objectives in the same areas of New Mexico and Arizona as SunZia, but it is planned to have far les negative impact. That appears to be a much better project; certainly having both projects is unnecessary. If one were to be approved, the Southline Project is the preferable one. The fact is that SunZia's project is highly speculative, anyway. Although it may involve some renewable energy sources, it seems likely to encourage just as much non-renewable energy. Perhaps this is why one of SunZia's partners, Energy Capital Partners, has withdrawn, and as of yet there has been no other partner to step in to take their place. The project is just no good!

For these reasons and more, I oppose the SunZia project, and I request you do as well.

Sincerely,

Lisa Vogel

Lisa Vogel
6270 N. Cielo Azul
Benson, AZ 85602

2457	Response to Comment
1	Alternative transmission line routes were considered within the I-10 corridor including portions of Subroute 4C3. Generally there is insufficient area available for the proposed right-of-way adjacent to I-10 because of existing development located along the highway, and therefore other potential alternatives following I-10 were eliminated from consideration.
2	The Southline Transmission Project is not considered an alternative or competing project to the SunZia Southwest Transmission Project. The proposed Southline Transmission Project (345 kV), located between southwestern New Mexico and southeastern Arizona, could transport additional electricity generated from sources in those areas; however, the purpose and need for the Southline project is different than for the SunZia Project. The Southline project's capacity would be limited according to the plan to construct portions of the proposed transmission lines within existing rights-of-way.

2462

SunZia Southwest
TRANSMISSION PROJECT

NATIONAL SYSTEM OF PUBLIC LANDS

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
New Mexico State Office

SunZia Southwest Transmission Project
Environmental Impact Statement

NAME: Molly McKasson Morgan
ADDRESS: 2888 E. 4th st
CITY: Tucson, STATE: AZ ZIP: 85716

Organization (if applicable)
Add to mailing list ☑ Yes ☐ No
Withhold personal information* ☐ Yes ☑ No
Receive notification of EIS availability? ☑ Yes ☐ No

COMMENTS:

To Whom it May Concern at the BLM:
I cannot understand the justification for the SunZia Project for multiple reasons. First, global warming is becomming absolutely irrefutable. Even scientists who might have disagreed a year ago are now convinced that climate change is mostly a manmade problem. To add more fossil fuel burning to this tragedy is unconscionable. Nuclear power is far too costly because it is so dangerous of the spent fuel.* You need to clarify what the cost is of the "no-build" option for AZ and NM compared to the SunZia project. * You need to look to new technologies and not such a wasteful and possibly destructive project: Be guardians of our natural resources

1

SEND COMMENTS TO:
SunZia Southwest Transmission Project | c/o EPG, Inc. | 4141 N. 32nd Street, Suite 102 | Phoenix, AZ 85018

*Copies of comments will be available for public review at the local BLM office during regular business hours. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

2462	Response to Comment
1	The Proposed Action includes the construction and operation of two 500 kV transmission lines and does not include generation sources. As stated in the DEIS (p. 1-7), "Federal Energy Regulatory Commission (FERC, or Commission) Order 888 provides that owners of transmission facilities make such services available on the open market. Table 1-1, Renewable Energy and Transmission Capacity Needed to Meet RPS, and Table 1-2, Summary of Generation Interconnection Requests to Existing Transmission Owners within the Project Area, illustrate, respectively, a need for additional renewable generation sources and a need for transmission capacity.

2467

From: Gilbert Urias [mailto:gulpimages@gmail.com]
Sent: Tuesday, August 07, 2012 1:48 PM
To: feedback
Subject: The SunZia Proposed Electric Transmission Line

Attention:

Secretary Ken Salazar
Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Salazar:

You have probably heard about SunZia, a company out of Louisiana who is proposing to build the largest electric transmission line project in the United States. This company touts green energy, but the power plants along the proposed route are fossil fuel burning facilities. There is no guarantee that any power would be made from renewable resources. SunZia did not propose renewable energy until several months after they faced environmental concern from a large contingent of citizens.

Originating in Northern Sonora, Mexico the San Pedro River is important because it is the last major free-flowing undammed river in the American Southwest. The routes chosen by the BLM and SunZia would divide the San Pedro River Valley here in Southern Arizona. This river hosts two-thirds of the avian diversity in the US. It is a major route for some 300 species of migrating birds and 100 species of breeding birds. The river also supports thriving riparian habitats and provides sustenance for some 84 species of mammals, 65 species of reptiles and amphibians, 20 species of bats, and 14 species of fish.

1 SunZia has held public meetings that I have personally attended. In those meetings SunZia bombards the public with copious amounts of cooked statistics and data - mostly telling of the research that has gone into the selected routes. They tell of the progress that has already been made, as if their forward momentum is beyond the point of any public scrutiny or consideration. Of all the specific data SunZia reports, one thing is glaringly absent: they mention nothing of the harm this proposed project will have on the San Pedro River.

People behind the proposed SunZia project have labeled me and other environmentally concerned citizens as having a condition they call the NIMBY Syndrome. This stands for Not In My Back Yard. This despicable term implies that I am selfishly trying to stifle progress by not caring about job creation, energy distribution, and tax revenues. Above all, it says that there is nothing special about the San Pedro Valley River System. Nothing could be further from the truth. In addition, there are other routes that would not affect the environment as much, but SunZia claims that it would be too costly. What they really mean is that they couldn't make as much short term profit. The San Pedro Valley is especially vulnerable to the this type of huge development because it is a narrow valley, unlike much larger adjacent valleys.

2 SunZia has an arrogant attitude and considers our environment to be the least of their concern. They wrongfully imply that their proposed line would fit in with the delicate riparian ecosystem. I have seen the destruction and the damage done with similar smaller projects, with all of the maintenance and soil erosion. The damage from this project would be enormous and irreversible. Especially in view of the fact that they are not concerned about our local environment. Along the 530 mile route they want to build gigantic 165 ft. tall twin towers every 1,200 to 1400 ft. That equals approximately 2,152 twin towers, each of which are permanent fifteen story tall metal structures! In addition, the maintenance roads to each twin tower structure would criss cross some of the nicest and most thriving riparian habitats in the U.S. SunZia is proposing a one-thousand foot wide easement to begin with, and they also intend to apply for a full mile wide easement! Apparently they have plans for the future. After doing research, I have found that the need for this type of transmission line is suspect at best. There is no shortage of infrastructure for electric transmission at this time. It is a scheme to make money - these are just businessmen proposing the idea.

New Mexico's BLM spokesman, Adrian Garcia, appears to be fully behind SunZia's proposed route through the San Pedro River Valley. He seems to be not only representing the BLM, he also appears to be an advocate for SunZia. I think he feels obligated, intimidated, or even threatened to say anything against SunZia's efforts. I wrote him a scathing letter in which I was very critical about his lack of environmental concern. After all, it was the BLM and The Nature Conservancy who encouraged me to place the conservation easement I have on my San Pedro property back in 1995. Back then the BLM was espousing a different ideology

2

2467	Response to Comment
1	The results of the impact assessment for water resources is included in Section 4.5 of the DEIS. As stated, selective mitigation measures would minimize potential impacts to the San Pedro River by locating structures to avoid or span the river. Additionally, an erosion control plan would be implemented to minimize the potential for sedimentation following construction of the Project.
2	The proposed Project description includes the construction and operation of transmission line towers that would be typically 135 feet and up to 170 feet in height. As requested in the right-of-way application, the typical right-of-way required for the Project would be 400 feet-wide, although up to 1,000 feet may be required in certain locations (see Section 2.4 of the DEIS).

2467

wherein multiple use meant that if land were to be developed it was to be done in a prudent fashion and abide by all environmental and ethical considerations. The BLM controls more land along the proposed route than any other entity. They are overseeing some 200 miles along the proposed 530 mile long path which would go from Socorro, NM to Coolidge, AZ. SunZia's proposed electric transmission line would be nothing short of raping and pillaging "One of Our Nations Last Great Places"' (*a quote from The Nature Conservancy).*

Sincerely,

Gilbert Urias
Tucson, Az
520 721 6966

3

2467	Response to Comment
	See following page(s)

Karen Anderson

Subject: Concerns regarding proposed "SunZia" Transmission Line

From: Garcia, Adrian A [mailto:agarcia@blm.gov]
Sent: Friday, August 24, 2012 11:41 AM
To: Don Kelly
Subject: FW: Concerns regarding proposed "SunZia" Transmission Line

Adrian Garcia
Project Manager/Realty Specialist
Bureau of Land Management
New Mexico State Office
(505) 954-2199

-----Original Message-----
From: BLM_NM_Comments
Sent: Monday, June 18, 2012 9:09 AM
To: Garcia, Adrian A
Subject: Concerns regarding proposed "SunZia" Transmission Line

FYI.

-----Original Message-----
From: caos [mailto:caos@caos.us.com]
Sent: Sunday, June 17, 2012 3:45 PM
To: BLM_NM_Comments
Subject: Concerns regarding proposed "SunZia" Transmission Line

Ladies & Gentlemen:

We own 20 acres in Deer Canyon Preserve, a 18,000 acre wildlife and nature preserve, located approximately 3 miles south of Mountainair, NM. We were drawn to this area of New Mexico because of the unspoiled character and rugged nature of the land.

In addition, the area is full of historic significance with the Salinas Pueblo Missions of Quarai, Abo and Gran Quivira surrounding Deer Canyon Preserve/Mountainair, connected by the Salinas Missions Trail, one of 24 state designated Scenic and Historic Byways in New Mexico.

1 The June 2012 Newsletter #4 on the SunZia Southwest Transmission Project shows, the Bureau of Land Management's preferred route heading northwest from the proposed substation near Corona, NM towards the ruins of Gran Quivira, bypassing them in an arc just a few miles to the north and continuing west towards Socorro.

The BLM's preferred route would have a great negative impact on the significance of Gran Quivira, " ... by far the best known of the Salinas pueblos, and in fact [is] one of the most celebrated ruins in all of the Southwest. ..." (Prince, L. Bradford (1915). Spanish Mission Churches of New Mexico. Cedar Rapids, IA: The Torch Press. pp. 355-356. ISBN 0-87380-126-1.).

1

2468	Response to Comment
1	The alternative routes located along NM Highway 380 have been evaluated (Subroute 1B1, 1B2); however, the northern routes (Subroute 1A1/1A2 were preferred because they would result in less impact to military operations within the airspace north of the WSMR. The BLM preferred route alignment described in the DEIS has been modified in the FEIS (Subroute 1A2) to address concerns regarding the cultural landscape setting sensitivity and mitigate the visual impacts associated with the Gran Quivira.

The mental picture of what the resident Pueblo indians in the early 17th century must have felt when they saw the Spanish missionaries arriving from the top of the hill at Gran Quivira would be lost for anyone visiting this National Monument.

I kindly ask you to consider an alternative route, such as the one shown on the map in the newsletter along US 380, in order to protect the significance and beauty of this cultural and historical landmark.

Thank you very much for listening to our concerns.

Kind regards,

Oliver Schwarz Cesar Apodaca

36 Juh Trail
Deer Canyon Preserve
Mountainair, NM 87036

2

2468	Response to Comment

APPLICANT COMMENTS

The Applicant (SunZia Southwest, LLC) submitted four letters containing comments on the Draft EIS to the BLM during the public review period; these letters are included in this section of Appendix J to the Final EIS. The comments included the following topics:

- Applicant's recommendations regarding the selection of the preferred alternative route or subroutes
- Clarification of the Arizona state siting and permitting process
- Suggested clarifications of the EIS review process

BLM's response to the Applicant's recommendations to change or modify the selection of the Project alternative(s) will be provided in the Record of Decision.

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1563

From: Tom Wray
To: BLM_NM_SunZia_Project
Subject: SunZia Southwest Transmission Project: BLM Draft EIS-Comments on Route Group 4.
Date: Wednesday, June 13, 2012 4:15:42 PM
Attachments: SunZia Comment No. 1 DEIS Rte Grp 4 (6-13-12).pdf

Adrian:

Please find SunZia's first set of comments to the BLM on the SunZia Southwest Transmission Project Draft Environmental Impact Statement. This set of comments is related to Route Group Number 4.

SunZia will be filing additional comments with the BLM during the period of Public Review.

Please do not hesitate to contact Gary Crane or myself with any questions.

Regards,

Tom

Tom Wray
Project Manager
SunZia Southwest Transmission Project
(602)808-2004 W
(505)695-0323 M
twray@southwestempower.com

1563

1563

June 13, 2012

Sent via Electronic Mail to:
Bureau of Land Management
C/O Adrian Garcia, BLM Project Manager,
NMSunZiaProject@blm.gov

Sent via U.S. Mail to:
SunZia Southwest Transmission Project
C/O EPG, Inc.
4141 North 32nd Street, Suite 102
Phoenix, AZ 85018

Re: SunZia Southwest Transmission Project's First Comment Letter on the SunZia Draft EIS, issued on May 25, 2012, regarding Route Group 4.

Dear Mr. Garcia:

The Bureau of Land Management ("BLM") has released the Draft Environmental Impact Statement ("DEIS") for the SunZia Southwest Transmission Project ("SunZia", "SunZia Project" or the "Project") for public review and comment. *See* U.S. Environmental Protection Agency's Notice of Availability of the DEIS for the SunZia Project, 77 Fed.Reg. 31355 (May 25, 2012). The DEIS effectively analyzes over 120 alternative routes. SunZia commends the BLM on the wide-range of alternative routes analyzed and carried forward thus far in the NEPA process.

BLM has selected Subroute 4C2c as part of the Preferred Alternative in this DEIS. ***SunZia respectfully requests that the BLM select Subroute 4B of Route Group 4 as the Preferred Alternative in the Final EIS.*** SunZia submits this formal comment to the BLM outlining why it continues to believe that Subroute 4B presents fewer potential impacts to the environment and thus is a more acceptable subroute than Subroute 4C2c.[1]

[1] It is important to note that this first comment letter is being offered solely for the purpose of explaining why SunZia believes the SunZia DEIS supports the selection of Subroute 4B instead of Subroute 4C2c as the BLM Preferred Alternative in Route Group 4. SunZia anticipates sending additional comment letter(s) during the 90-day review period covering other substantive issues.

3610 N. 44th Street, Suite 250, Phoenix, AZ 85018 | Phone 602-808-2004 | Fax 602-808-2099 | www.sunzia.net

The BLM's Preferred Alternative, Subroute 4C2c, unnecessarily parallels the San Pedro River for 45 miles, cutting across perennial feeder streams and creating an increased likelihood of negative impacts to what was identified as a unique watershed and riparian environment during scoping. Subroute 4C2c will very likely result in negative impacts on water resources and the riparian habitat in the lower San Pedro River, and increase the risk of erosion. SunZia believes such damage will be very difficult to mitigate and sets forth in this letter why it believes the best course of action is for the BLM to select Subroute 4B as the Preferred Alternative in the Final EIS. Furthermore, only 12 miles of the 45-mile portion of Subroute 4C2c that parallels the San Pedro River follows existing linear infrastructure. This infrastructure is an *underground* pipeline. This is the *only* area along the San Pedro River where Subroute 4C2c follows an existing linear feature. SunZia believes this amounts to an insignificant collocation of utility corridors and does not result in Subroute 4C2c being a more environmentally sound alternative than Subroute 4B.

Subroute 4B is a superior alternative route because it:

- Crosses but does not parallel the San Pedro River and its unique riparian environment for approximately 45 miles
- Avoids degradation of water quality caused by sedimentation and erosion from new roads in the San Pedro River Valley
- Does not have the highest impact on water resources compared to other alternatives
- Avoids any impacts to military missions at U.S. Army's Fort Huachuca
- Has substantially less mileage, cost, and environmental impact
- Avoids 223 acres of temporary ground disturbance and 135 acres of permanent ground disturbance
- Better satisfies objections raised by the public, county governments and elected officials
- Has impacts that can be more effectively mitigated

The SunZia DEIS states that the BLM Preferred Alternative, including Subroute 4C2c, was selected to:

- *"maximize use of existing utility corridors and infrastructure*
- *minimize impacts to sensitive resources*
- *minimize impacts at river crossings*

- *minimize impacts to residential and commercial uses, and*
- *minimize impacts to military operations within the restricted airspace north of the WSMR"*

[*See* SunZia DEIS at § 2.5.4.]

SunZia believes that Subroute 4B meets these criteria, as applicable in Arizona. Moreover, SunZia believes that Subroute 4B would be a better alternative to minimizing impacts to sensitive resources, especially water resources in the lower San Pedro River Valley. Subroute 4B also minimizes impacts to military operations by completely avoiding Ft. Huachuca's Buffalo Soldier Electronic Proving Ground.

As discussed below, SunZia believes that Subroute 4C2c's impacts to the San Pedro River Valley can be avoided by selecting Subroute 4B in the Final EIS.

I. As evidenced by the SunZia DEIS, Subroute 4C2c has greater impacts to the environment, particularly the San Pedro River Valley, than Subroute 4B.

Subroute 4C2c is 161.2 miles long, while Subroute 4B is 133.0 miles long. This means that Subroute 4C2c has 28.2 more miles of impacts on the environment than Subroute 4B. Moreover, Subroute 4C2c's increased length requires more ancillary facilities, such as roads for construction and maintenance, structures, concrete batch plants, etc., than Subroute 4B, and would thus have a larger amount of ground-disturbing activities than Subroute 4B. For example, Subroute 4C2c has 223 more acres of temporary ground disturbance and 135 more acres of permanent ground disturbance than Subroute 4B. *See* SunZia DEIS Table 2-12. Accordingly, the selection of Subroute 4C2c presents a significant increase in project cost, approximately $2.7 million dollars *more* per mile, than Subroute 4B. Appendix H to the DEIS further illustrates this point. Subroute 4C2c has more mileage of impacts which are much greater than those of Subroute 4B with respect to Mineral Resources, Paleontological Resources, Water Resources, Biological Resources (including Vegetation, and Threatened and Endangered Species), Existing Land Use and Special Management Areas, and Future Land Use. *See* DEIS at Appendix H.

The main text of the DEIS indicates that Subroute 4C2c has more *severe* environmental impacts than Subroute 4B with respect to the following:

- Subroute 4C2c has greater impacts to water resources in the San Pedro River Valley than Subroute 4B: *"Subroute 4C2c has 36 percent of the route sensitive to water resources, which, along with 4C2, is the highest sensitivity. This is a result of crossing more mileage of perennial streams and 42 miles of the sole source aquifer, and having the second longest route." Id.* at § 4.5.
    - Subroute 4C2c crosses more perennial rivers and ephemeral streams than does Subroute 4B. *Id.*

- Subroute 4C2c parallels the San Pedro River for more than 45 miles, whereas Subroute 4B does not. *Id.* According to map "Figure M 10-4W" only 12 miles of the 45 miles paralleling the San Pedro River follows a linear feature which is an *underground* pipeline.
- Subroute 4C2c would likely require the construction of new roads for construction and maintenance of the line, many of which would cross ephemeral feeder streams for the San Pedro River. Each ephemeral stream crossing would require the roads to have special construction and mitigation measures. Such new road construction in the San Pedro River Valley would lead to environmental impacts on water resources and the unique habitat along the San Pedro River.

- Subroute 4C2c has a higher potential to impact known cultural resources than Subroute 4B. *See* DEIS at § 2.5.
- Subroute 4C2c has a higher potential to impact paleontological resources than Subroute 4B. *See* DEIS at § 4.4.
- Subroute 4C2c has higher impacts to existing land use and recreation. *Id.* at Table H11 and at § 4.10.
  - Subroute 4C2c has higher impacts to existing land use because it "[c]rosses agricultural and residential properties (Link C110)." *Id.* at Appendix H.
  - Subroute 4C2c has higher impacts to existing land use because it "[c]rosses Pima County-managed Preserved Lands (Six Bar Ranch-Link A450 and A7 Ranch-links C276 and C441)." *Id.* at Appendix H.
  - Subroute 4B has "[n]o significant impacts" on existing land uses. *Id.* at Appendix H.
- Subroute 4C2c would result in indirect impacts affecting outstanding opportunities for solitude as it would be located 2 to 2.5 miles from and be visible from 17 percent of the Rincon Mountain Wilderness Area; whereas, Subroute 4B would be located 2.9 miles from and be visible only from 8 percent of the Santa Teresa Wilderness Area. *Id.* at § 4.12.
- Subroute 4C2c impacts more environmental justice tracts than Subroute 4B. *Id.* at § 4.14.

While BLM's Preferred Alternative has more environmental impacts, especially regarding water resources in the San Pedro River Valley, the DEIS identifies some environmental concerns regarding Subroute 4B.

The DEIS describes mitigation measures that may be applied to both subroutes. Once fully mitigated with these measures, ***Subroute 4B emerges with fewer residual environmental impacts than Subroute 4C2c.***

II. Subroute 4C2c will create more impacts to the missions of the Department of Defense ("DOD"), specifically Fort Huachuca, than Subroute 4B.

As explained in the DEIS, the Buffalo Soldier Electronic Proving Ground is an area in which Fort Huachuca conducts tests for electronic combat and warfare equipment. *See* DEIS at § 3.10. As part of Fort Huachuca's mission, the existing *"facilities within the Electronic Proving Ground study area, such as power lines, cell phone towers, radio stations, and other 'emitters,' have been measured and taken into account to form a 'zero point' for testing purposes."* *Id.* Consequently, the addition of ambient noise from two new 500kV transmission lines would require an adjustment of Fort Huachuca's zero point. The BLM's Preferred Alternative would cross approximately 9.5 miles of the electronic proving ground. *See* DEIS at § 4.10. Subroute 4B does not traverse any portion of the electronic proving ground.

In other contexts where the military has identified potential mission impacts associated with particular subroutes, specifically within the Northern General Call-up Area in New Mexico, the BLM has been responsive and, where possible, taken steps to minimize and reduce such impacts through subroute re-alignments. *See e.g.* DEIS at § 2.3.3.1. This is illustrated by one of the BLM's justifications for selecting the Preferred Alternative in New Mexico. Specifically, the DEIS states that the Preferred Alternative was selected to *"minimize impacts to military operations within the restricted airspace north of the WSMR."*[2] *See* SunZia DEIS at § 2.5.4.

SunZia supports the military and its missions. SunZia's support of the military extends beyond New Mexico, and includes the desire to not unnecessarily create impacts to Fort Huachuca's activities in its electronic proving ground. ***In other words, SunZia believes that with respect to Subroute 4C2c, the BLM has selected a Preferred Alternative that creates avoidable impacts, however severe they may be, to critical test protocols that do not exist with Subroute 4B as suggested here by SunZia.*** Consequently, SunZia respectfully requests the BLM to select Subroute 4B in order to avoid these impacts. Doing so would be consistent with the BLM's rationale in taking similar avoidance actions with respect to the missions of the military in New Mexico.

[2] This statement is unclear, as, based upon meetings attended by SunZia and information in the DEIS, the Subroute 1A1 route was selected to avoid conflicting with the DOD's operations in the Northern Call-up Area, and had nothing to do with airspace issues, as the structures for the SunZia Project are below the height threshold to interfere with airspace. SunZia has and will continue to work with DOD to try to avoid potential impacts to their training exercises. Consequently, SunZia is supportive of the portion of Subroute 1A1 north of the White Sands Missile Range, as such a route was identified by the DOD as being acceptable and not in conflict with the training missions in the Northern Call-up Area.

III. Comments submitted during the scoping period regarding Subroute 4C2c that describe impacts that are difficult to effectively mitigate.

During and following the year-long scoping period, members of the public, local units of government, and Members of Congress expressed many concerns regarding impacts associated with routes traversing the San Pedro River Valley and paralleling the lower San Pedro River. The concerns expressed in public comments have been documented in the Scoping Report. After publication of the DEIS, similar comments in various periodicals have been echoed.

Pima County submitted several memoranda during scoping. Pima County expressed concerns over the impacts of an extra high voltage transmission line through the San Pedro River Valley. Pima County indicated that routing a transmission line through the San Pedro River Valley would be inconsistent with the Sonoran Desert Conservation Plan ("SDCP"). The SDCP is a conservation plan promulgated by Pima County, which *"guide[s] . . . future land use decisions of [Pima] County . . ., guide[s] where public money [in Pima County] is spent to conserve open space, how cultural and historic resources are protected [in Pima County], and how [the] western lifestyle [in Pima County can] continue[]."* http://www.pima.gov/cmo/sdcp/intro.html (last visited June 5, 2012).

The SDCP is discussed in the SunZia DEIS. The SunZia DEIS indicates that the SDCP identifies Priority Vulnerable Species within the study corridor. *See* SunZia DEIS at § 3.6.6.10 and at Appendix B1. The importance of the SDCP, and the potential for Subroute 4C2c to conflict with the same, is exemplified by Pima County's specific objection that routes through the San Pedro River Valley, including Subroute 4C2c, would traverse and directly impact A7 Ranch. Specifically, *"A7 was purchased by Pima County in 2004 to support the Sonoran Desert Conservation Plan goal of conserving unfragmented habitats that benefit wildlife, the environment and for the preservation of a piece of Southern Arizona's cattle ranching history."* http://www.pima.gov/nrpr/parks/nrparks/A7RA_access_flyer.pdf (last visited June 6, 2012). Moreover, A7 Ranch was purchased using voter-approved bond monies. A7 Ranch is comprised of 6,800 acres of fee land, 34,000 acres of Arizona State Land Trust grazing leaseholds, and an 80-acre BLM grazing permit. Pima County operates A7 Ranch as an actual ranch, while simultaneously conserving, promoting, and protecting the biological resources and ecological value of the land.

According to Pima County's scoping comments, dated February 17, 2010, routes traversing A7 Ranch, such as Subroute 4C2c, would undermine Pima County's conservation efforts by bifurcating habitat, impacting ranching operations, reducing the amount of available grazing lands, impacting the roads that service the ranch, and increasing the risk of unwanted public access. While the A7 Ranch is not a protected area under state or federal law, it is an area that Pima County has identified as worth preserving and maintaining, and thus a factor that should be considered in BLM's selection of the Preferred Alternative in the Final EIS.

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Concerns expressed by Pima County about routes in the San Pedro River Valley, including Subroute 4C2c, are comparable to those documented in other scoping comments submitted to the BLM. Some of these concerns included, but were not limited to, concerns that a route through the San Pedro River Valley would impact unique wildlife habitat and characteristics. Summarily, Pima County indicated that a route through the San Pedro River Valley would (i) cause habitat fragmentation in a relatively undisturbed environment, (ii) would impact unique wildlife characteristics and habitat, including traversing a number of wildlife corridors, (iii) would lead to the permanent loss of vegetation while allowing and facilitating noxious weeds and invasive plant species, (iv) would traverse a number of important conservation areas, and (v) impact cultural resources. *See e.g.* February 17, 2010, Comment Letter submitted by C.H. Huckelberry, County Administrator for Pima County (stating *"minor adjustments to the line footprint will not adequately mitigate potential impacts."*); June 7, 2010, Comment Letter submitted by C.H. Huckelberry, County Administrator for Pima County. Conversely, neither Pima County nor Cochise County criticized or expressed concern regarding Subroute 4B.

In addition to opposition from Pima County during scoping, routes through the San Pedro River Valley, which includes Subroute 4C2c, likewise received opposition from U.S. Representative Raul Grijalva of Arizona and former U.S. Representative Gabrielle Giffords of Arizona. Both Representatives indicated that they support the development of renewable energy, which includes the development of new transmission infrastructure. However, both Representatives consistently opposed any routes through the San Pedro River Valley. The following is a summary list of their opposition as stated in letters to the Secretary of Interior and in other public documents:

- A transmission line in the San Pedro River Valley would fragment core habitat for wildlife.
- A transmission line in the San Pedro River Valley would impact water quality in the San Pedro River due to erosion from upland soil from new or expanded access roads needed for the construction and maintenance of the transmission line.
- *"There are no sufficient mitigation options for the damage new roads and infrastructure development could do to this fragile area."* Letter from Representative Grijalva to Secretary Salazar, dated January 5, 2010.
- A transmission line in the San Pedro River Valley would disturb a pristine and natural environment that is *"one of the most biologically diverse riparian habitats in the desert Southwest."* San Pedro River Valley News, *Giffords, Grijalva oppose SunZia project location* (February 3, 2010).

As indicated by these excerpts, both Representatives expressed concerns over impacts to wildlife, water resources, and disturbance of a unique and relatively intact environment

associated with Subroute 4C2c, and other routes paralleling the San Pedro River Valley. However, neither Representative has raised comparable concerns with respect to Subroute 4B.

Several public comments submitted during and after scoping opposed any route through the San Pedro River Valley, including Subroute 4C2c. The reasons offered in these public comments were generally reiterations of the arguments raised by Pima County and both Members of Congress whose districts in Arizona are affected by Subroute 4C2c (*see* Appendix E to the Scoping Report, available online at http://www.blm.gov/pgdata/etc/medialib/blm/nm/programs/more/lands_and_realty/sunzia/sunzia_scoping_report1.Par.65928.File.dat/Addendum%20to%20Scoping%20Report_App%20E.pdf (last visited June 5, 2012)).

As evidenced by the opposition from Pima County, the two Members of Congress, and the applicable public comments, the BLM's Preferred Alternative, specifically Subroute 4C2c, is not a publicly-preferred alternative and would cause impacts to an environmentally-significant area in Arizona. SunZia believes these impacts are avoided by selection of Subroute 4B in lieu of Subroute 4C2c. Therefore, SunZia requests the BLM reconsider the pros and cons of the Route Group 4 alternatives, and select the less contentious and more effectively mitigable Subroute 4B, as the BLM Preferred Alternative in the Final EIS. Such an action would be consistent with BLM's objective to minimize impacts to sensitive resources.

IV. Summary and Recommendation

SunZia recommends that the BLM select Subroute 4B as its Preferred Alternative in Route Group 4 in the SunZia Final EIS.

Subroute 4B is a superior alternative route because it:

- Crosses but does not parallel the San Pedro River and its unique riparian environment for approximately 45 miles
- Avoids degradation of water quality caused by sedimentation and erosion from new roads in the San Pedro River Valley
- Does not have the highest impact on water resources compared to other alternatives
- Avoids any impacts to military missions at U.S. Army's Fort Huachuca
- Has substantially less mileage, cost, and environmental impact
- Avoids 223 acres of temporary ground disturbance and 135 acres of permanent ground disturbance

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- Better satisfies objections raised by the public, county governments and elected officials
- Has impacts that can be more effectively mitigated

After you have had a chance to review and consider this letter, I would welcome an opportunity to discuss its recommendation. If you have any questions or suggestions, please do not hesitate to contact me.

Sincerely,

Tom Wray
Project Manager
SunZia Southwest Transmission Project

1559

From: Tom Wray
To: BLM_NM_SunZia_Project
Cc: Cindy Freeman; Gary Crane
Subject: SunZia Southwest Transmission Project: Second Comment Letter
Date: Monday, June 25, 2012 4:25:41 PM
Attachments: SunZia-Comment-No 2-Rte-Group 3_120625.pdf

Adrian:

Attached is our Second Comment Letter for BLM's consideration regarding the SunZia Southwest Transmission Project Draft Environmental Impact Statement.

This letter provides comments on Route Group 3.

Please do not hesitate to contact Gary Crane or me with any questions.

Thank you.

Tom Wray

Project Manager
SunZia Southwest Transmission Project
(602)808-2004 W
(505)695-0323 M
twray@southwesternpower.com

1559

1559

June 25, 2012

Sent via Electronic Mail to:
Bureau of Land Management
C/O Adrian Garcia, BLM Project Manager,
NMSunZiaProject@blm.gov

Sent via U.S. Mail to:
SunZia Southwest Transmission Project
C/O EPG, Inc.
4141 North 32nd Street, Suite 102
Phoenix, AZ 85018

Re: SunZia Southwest Transmission Project's ("SunZia") Second Comment Letter on the SunZia Draft Environmental Impact Statement ("DEIS") issued on May 25, 2012, regarding Route Group 3.

Dear Mr. Garcia:

On June 13, 2012, SunZia submitted its first comment letter, in which it explained why it believes that in the Final EIS Subroute 4B should be selected as the preferred alternative in Route Group 4, as it has fewer environmental impacts than does Subroute 4C2c, which was identified as the BLM's Preferred Alternative in Route Group 4 in the DEIS. The purpose of this second comment letter is to outline SunZia's concerns associated with the BLM's Preferred Alternative in Route Group 3, **Subroute 3A**. SunZia believes Subroute 3A is a more environmentally sound selection compared to Subroute 3A1, as it presents fewer environmental impacts and is a shorter, more efficient subroute .[1]

The SunZia DEIS states that the BLM Preferred Alternative was selected to:

- *"minimize impacts to sensitive resources*
- *minimize impacts at river crossings*

[1] It is important to note that this second comment is being offered solely for the purpose of explaining why SunZia believes that the SunZia DEIS ultimately supports the selection of Subroute 3A instead of Subroute 3A1 as the BLM Preferred Alternative. SunZia anticipates sending additional comment(s) during the 90-day review period covering other substantive issues.

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- *minimize impacts to residential and commercial uses, and*
- *minimize impacts to military operations within the restricted airspace north of the WSMR"*

[*See* SunZia DEIS at § 2.5.4.].

SunZia believes Subroute 3A better meets the BLM's criteria for selection of the preferred alternative outlined at SunZia DEIS at § 2.5.4 because such a selection would minimize impacts to sensitive resources, including water.

Summarily, in light of SunZia's first and second comment letters, SunZia recommends the BLM select as the Preferred Alternative in the Final EIS the following subroutes: Subroute 4B in the place of Subroute 4C2c in Route Group 4 and Subroute 3A instead of 3A1 in Route Group 3. This configuration would present fewer environmental impacts, especially with respect to impacts on water resources, than would the BLM's currently selected subroutes comprising its Preferred Alternative in the DEIS.

I. The BLM should select Subroute 3A as the Preferred Alternative in Route Group 3, as it has fewer environmental impacts than the BLM Preferred Alternative identified in the DEIS, Subroute 3A1.

SunZia provides the following rationale to outline why it continues to believe that Subroute 3A presents fewer potential impacts to the environment and thus is more acceptable than Subroute 3A1. First of all, Subroute 3A1 is 140.3 miles long, while Subroute 3A is 123.4 miles long. This means that Subroute 3A1 has 16.9 more miles of impacts on the environment than Subroute 3A. Moreover, Subroute 3A1's increased length likely requires additional ancillary facilities, such as roads for construction and maintenance, transmission structures, concrete batch plants, etc., than Subroute 3A, and would thus have a larger amount of ground-disturbing activities than Subroute 3A. For example, Subroute 3A1 has 134 more acres of temporary ground disturbance and 129 more acres of permanent ground disturbance than Subroute 3A. *See* SunZia DEIS at Appendix H. Accordingly, the selection of Subroute 3A1 presents a significant increase in project cost, approximately $2.7 million dollars more per mile, than Subroute 3A.

Appendix H to the DEIS further illustrates the increased footprint, and thus larger total area of impacts, associated with Subroute 3A1. In many instances the impacts from Subroute 3A and 3A1 would be similar, save for the fact that Subroute 3A1 is nearly 14% larger and thus generally has at least 14% more area of impacts on a particular resource. Additionally, Subroute 3A1 has more mileage of greater impacts than Subroute 3A with respect to Water Resources, Biological Resources (including Vegetation, and Threatened and Endangered Species with respect to the Lordsburg Playa), and Sensitive Viewers. *See* SunZia DEIS at Appendix H.

Specifically, below is a listing of impacts from Subroute 3A1, the BLM's Preferred Alternative in Route Group 3, which are either greater than, or are not associated with Subroute 3A:

- Subroute 3A1 would cross the Lordsburg Playa and impact sensitive plants and invertebrates, whereas Subroute 3A would avoid the Lordsburg Playa. *See* SunZia DEIS at Appendix H and § 4.6.5.
- Subroute 3A1 would have more impacts to water resources than Subroute 3A. *See* SunZia DEIS at Appendix H.
  - Subroute 3A1 would cross more mileage of perennial rivers, intermittent streams, and would cross more wells and water bodies than Subroute 3A. *See* SunZia DEIS at § 4.5.3.
  - *"Subroute 3A1 has the highest mileage of residual impacts to water resources within Route Group 3. . ."* *Id.*
- Subroute 3A1 has potential to impact a greater amount of known cultural resources. *See* SunZia DEIS at § 2.5.
- Subroute 3A1 has higher impacts to visual resources, and Subroute 3A is in compliance with the BLM's visual resource management objectives whereas Subroute 3A1 is not. *See* SunZia DEIS at § 2.5, § 4.9.3, and Appendix H.
  - Subroute 3A1 could have visual impacts in the San Simon area, whereas Subroute 3A would avoid residences associated with San Simon. *See* SunZia DEIS at § 2.5.
  - Subroute 3A1 would have higher visual resource impacts to wilderness characteristics of the Peloncillo Wilderness. *Id.*
- Subroute 3A1 has higher impacts to existing land uses. *"Subroute 3A would cross 0.3 mile of BLM right-of-way avoidance area, Subroute 3A1 would cross 1.3 miles of BLM right-of-way avoidance areas in two locations. . ."* *See* SunZia DEIS at § 2.5. Consequently, Subroute 3A1 is more inconsistent with existing resource management plans in the area.

Based on information found in the DEIS, as outlined above, Subroute 3A1 results in more severe impacts than Subroute 3A. The one unique component of affected environment for Subroute 3A is that it is aligned near the Hot Well Dunes Recreation Area – SRMA/Campground. *See* SunZia DEIS at § 4.10.5. Specifically, Subroute 3A could allow unauthorized use of the recreation area by facilitating access where none previously existed. *Id.* However, impacts to the Hot Well Dunes Recreation Area – SRMA/Campground could be

effectively mitigated, as outlined in the DEIS. Summarily, to address public access-related issues, impacts from road construction would be mitigated through measures developed and outlined in the Construction, Operations and Maintenance Plan, including compliance with federal, state, and local rules and regulations regarding construction activities, noxious weed management, and fugitive dust control. Such mitigation measures would allow the impacts of Subroute 3A to be more effectively mitigated than the impacts of Subroute 3A1, especially with respect to impacts on water resources and the Lordsburg Playa.

As justification for selecting Subroute 3A1, the DEIS focuses on the fact that it is in alignment with a pipeline, and thus is *"collocated"* with *"existing"* infrastructure for a larger percentage of the route than Subroute 3A. However, following an underground pipeline does not provide much advantage, as additional ground disturbance would occur above ground and in a new right-of-way without the benefit of traditional collocated facilities, such as existing transmission lines. Consequently, this is not a strong justification, especially in light of the otherwise avoidable increase in impacts to water resources and the Lordsburg Playa.

Summarily, in considering the greater amount of environmental impacts associated with the BLM's Preferred Alternative of 3A1 coupled with its increased length and cost, on balance, should render Subroute 3A1 less desirable than Subroute 3A.

II. Summary and Recommendation

SunZia recommends that the BLM select Subroute 3A as its Preferred Alternative in Route Group 3.

Subroute 3A is a superior alternative route because it:

- Avoids impacts to the Lordsburg Playa
- Avoids additional impacts to water resources
- Has fewer impacts to visual resources
- Has potential to impact fewer known cultural resources
- Has impacts that are more effectively mitigated
- Has substantially less mileage, cost, and environmental impact
- Results in fewer acres of temporary and permanent ground disturbance

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After you have had a chance to review and consider this letter, I would welcome an opportunity to discuss its recommendation. If you have any questions or suggestions, please do not hesitate to contact me.

Sincerely,

Tom Wray

Tom Wray
Project Manager
SunZia Southwest Transmission Project

July 30, 2012

Sent via Electronic Mail to:
Bureau of Land Management
C/O Adrian Garcia, BLM Project Manager,
NMSunZiaProject@blm.gov

Sent via U.S. Mail to:
SunZia Southwest Transmission Project
C/O EPG, Inc.
4141 North 32nd Street, Suite 102
Phoenix, AZ 85018

RECEIVED
JUL 31 2012

Re: SunZia Southwest Transmission Project's Third Comment on the SunZia Draft EIS, regarding SunZia's Suggested Alternative.

Dear Mr. Garcia:

The SunZia Southwest Transmission Project ("SunZia" or the "Project") submitted its first and second comments, on June 13 and 25 respectively. These comments explained why SunZia believes that in the Final EIS Subroutes 3A and 4B should be selected as the Preferred Alternative in Route Groups 3 & 4. The purpose of this third comment is to identify SunZia's concerns associated with a portion of the BLM's Preferred Alternative in Route Group 1, Subroute 1A1. For the reasons outlined herein, SunZia believes that a better, more technically feasible Preferred Alternative would utilize a majority of Route 1A1, but in lieu of Segment A260 would use Segment A270 to avoid two additional and otherwise unnecessary crossings of I-25.[1]

Additionally, this third comment provides a summary of SunZia's "Suggested Alternative" that it believes be should be designated as the BLM's Preferred Alternative in the Final EIS. The Suggested Alternative is comprised of a modified version of Subroute 1A1 that replaces Segment A260 with Segment A270, Subroute 3A and Subroute 4B. SunZia believes that its Suggested Alternative better meets the BLM's criteria for selection of the Preferred

[1] It is important to note that this third comment is being offered only for the purpose of explaining why SunZia believes the SunZia Draft EIS ultimately supports the selection of Segment A270 instead of Segment A260 in the context of Subroute 1A1, and providing summary of why SunZia believes its Suggested Alternative is superior to the BLM's Preferred Alternative in the Draft EIS. SunZia may send additional comment(s) during the 90-day review period covering other substantive issues.

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Alternative as outlined in the SunZia Draft EIS at § 2.5.4, because such a selection would minimize impacts to sensitive resources, disturb less acreage, and is technically more feasible.

I. Subroute 1A1 should be modified by replacing Segment A260 with A270, as such an adjustment would make Subroute 1A1 technically more feasible.

With respect to Subroute 1A1, SunZia, by and large, supports the selection of the same, with the exception of Segment A260. Segment A260 unnecessarily requires two additional crossings of I-25, within approximately 20 miles of one another, resulting in three crossings of I-25. Alternatively, utilization of Segment A270 in lieu of Segment A260 and would require one crossing of I-25. Segment A270 would require two less encroachment permits from the New Mexico Department of Transportation ("NM DOT") and would reduce the crossings of the I-25 access control area to a single crossing north of Socorro, New Mexico.

Based upon the experience of those working on behalf of SunZia, it is strongly believed that the NM DOT would be reticent to approve three encroachment permits for a single project within an approximate 65-mile span of interstate, as would be required for Subroute 1A1 to be feasible with the use of Segment A260. Alternatively, it is strongly believed NM DOT would be much more amenable and thus likely to approve one encroachment permit, as contemplated by the use of Segment A270 in the context of Subroute 1A1. Therefore, based on concerns related to the ability to permit Segment A260, the use of Segment A270 in the place of Segment A260 likely makes Subroute 1A1 technically more feasible. Accordingly, SunZia believes that the Final EIS should identify a Preferred Alternative that utilizes a modified version of Subroute 1A1, *whereby Segment A260 is replaced by the utilization of Segment A270.*

II. The Suggested Alternative is environmentally superior to the BLM's Preferred Alternative in the Draft EIS, and should thus be considered for selection as the BLM's Preferred Alternative in the Final EIS.

The Applicant has already submitted substantive comments on the BLM's selection of Subroutes 3A1 and 4C2c as part of the Preferred Alternative in the Draft EIS. This comment provides a summary of why the Suggested Alternative is an overall superior alternative to the BLM's Preferred Alternative in the Draft EIS.

First of all, the Preferred Alternative is 48.7 miles, or about 10% longer than the Suggested Alternative. Using information found in the Draft EIS, this increased length means that the Preferred Alternative would require over 300 additional structures, at least one more concrete batching plant, and at least one more fiber optic regeneration station, than does the Suggested Alternative. Consequently, we estimate that the Preferred Alternative could increase the Project's cost by over a $100 million.

Secondly, in addition to this avoidable cost increase, the Preferred Alternative causes a significant increase in environmental impacts in the form of ground disturbance when compared to the Suggested Alternative. The Preferred Alternative would lead to at least 357 more acres of

temporary ground disturbance and 219 more acres of permanent ground disturbance than the Suggested Alternative. While there can be a good basis to add length to a project, such as avoiding an impact to a particularly sensitive resource, no such justification is provided in the Draft EIS supporting this increased length.

Rather, the primary justification provided in the Draft EIS for the selection of Preferred Alternative is that it utilizes a route with the most potential to collocate the transmission line with existing infrastructure. However, upon further review of the Draft EIS Appendix H, the Preferred Alternative qualitatively appears to have comparably severe environmental impacts or, as is the case with water resources, more severe environmental impacts than the Suggested Alternative. Consequently, the Preferred Alternative does not seem to offer any qualitative environmental advantages, and instead adds quantitative impacts, i.e. it has a greater amount of mileage and acreage of impacts to resources because it is longer. Therefore, adding 10% to the length of the Project to provide for more collocation of infrastructure does not present an environmentally sound strategy compared to the Suggested Alternative, which by comparison to the Preferred Alternative, presents quantitatively fewer impacts for all resources and qualitatively less severe impacts to some resources, particularly water resources.

III. Summary and Recommendation

SunZia recommends that in the Final EIS, the BLM select a modified Subroute 1A1, in which Segment A270 is used in the place of Segment A260 as its Preferred Alternative in Route Group 1. Utilization of Segment A270 is superior because it avoids two additional crossing of I-25, and is thus likely more feasible.

In summary, SunZia also recommends that the BLM select the Suggested Alternative (consisting of Subroutes 1A1 utilizing Segment A270 in lieu of A260, and Subroutes 3A and 4B) as its Preferred Alternative in the Final EIS. The Suggested Alternative is a superior alternative because, among other things, it:

- Is more consistent with existing land-uses.
- Has fewer visual impacts.
- Has fewer impacts to sensitive biological resources.
- Has fewer impacts to known cultural resources.
- Has less severe impacts on water resources.
- Is more consistent with military missions of the Department of Defense.
- Is substantially less mileage, cost and ground disturbance.
- Better satisfies objections raised by the public and elected officials.

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- Can be more effectively mitigated.

After you have had a chance to review and consider this letter, I would welcome an opportunity to discuss its recommendation. If you have any questions or suggestions, please do not hesitate to contact me.

Sincerely,

Tom Wray
Project Manager
SunZia Southwest Transmission Project

1607

August 15, 2012

Sent via Electronic Mail to:
Bureau of Land Management
C/O Adrian Garcia, BLM Project Manager,
NMSunZiaProject@blm.gov

Sent via U.S. Mail to:
SunZia Southwest Transmission Project
C/O EPG, Inc.
4141 North 32nd Street, Suite 102
Phoenix, AZ 85018

Re: SunZia Southwest Transmission Project's ("SunZia") Fourth Comment on the SunZia Draft EIS, issued on May 25, 2012, requesting clarifications on: (1) the Final EIS Comment Period; (2) the Arizona Corporation Commission's role in a "Decision to be Made"; and (3) the fact that Southline Project does not present reasonably foreseeable future cumulative impacts on the affected environment associated with the SunZia Project.

Dear Mr. Garcia:

As you are aware, SunZia has provided three previous comments on the SunZia Draft EIS, all of which related to a request that, based upon the analysis in the Draft EIS, the BLM select Segment A270 instead of A260 in Subroute 1A1, Subroute 3A, and Subroute 4B as the Preferred Alternative in the Final EIS. This letter is not related to the BLM's selection of a Preferred Alternative in the Final EIS. Rather, the purpose of this fourth comment is to request that the BLM do the following:

- Clarify whether there will be a comment period on the Final EIS. Such a clarification should include an explanation as to which public participation processes apply generally to the Final EIS and which relate to the proposed resource management plan amendments in the Final EIS.
- Clarify in the Final EIS that, in addition to the existing list of agencies in the Draft EIS under the section entitled "Decisions to be Made," the Arizona Corporation Commission ("ACC") has a relevant decision to make. In making this clarification, SunZia also requests that the BLM define and explain the scope of the "decision to be made" by the ACC.
- Clarify in the Final EIS that the Southline Transmission Project does not have reasonably foreseeable future impacts on the affected environment associated with SunZia.

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Summarily, the Draft EIS is a very robust and thorough examination, which thus far has required over three years to produce and describes the potential impacts and mitigation, associated with SunZia on its affected environment. The depth of analysis is a product of three distinct and separate scoping periods that, taken together, resulted in a year-long scoping process, followed by a Draft EIS drafting-period that extended nearly two years beyond the close of scoping.

The requested clarifications below were identified by SunZia as information that would be helpful to stakeholders and members of the public notwithstanding the thorough analysis in the Draft EIS.

I. Clarification Regarding the Comment Period on the Final EIS.

The request for clarification regarding public comment on the Final EIS begins with a summary of the extensive public outreach conducted by the BLM associated with SunZia's NEPA process. Such a review and summary provides context and background for the process going forward and this comment's first request for clarification.

The Notice of Intent for SunZia[1] ("NOI") indicated that there would be a 45-day scoping period. The BLM went beyond this advertised 45-day scoping period, affording the public and concerned stakeholders a total of three separate scoping periods lasting over a year-long timeframe. Over the course of the year-long scoping process the BLM conducted 14 public scoping meetings, numerous meetings with stakeholder groups and organizations, and several meetings with Cooperating Agencies. SunZia commends the BLM for conducting this thorough scoping process. BLM's scoping efforts afforded the public and interested stakeholders multiple opportunities for their concerns to be voiced, and their comments to be reduced to writing so that they may be considered in the context of the Draft EIS.

The NOI also indicated that following publication of the Draft EIS there would be a 90-day comment period and that the BLM would "provide additional opportunities for public participation." Once again, the BLM acted in a commendable manner by providing ample opportunities for public participation by conducting 10 public meetings in different communities potentially impacted by SunZia. It should be noted that conducting 10 public meetings following the issuance of a Draft EIS is something that goes beyond the requirements of NEPA, and is indicative of the BLM's ongoing dedication of ensuring meaningful public participation in this NEPA process.

SunZia attended each of the public meetings following the issuance of the Draft EIS, and would like to note that BLM notified the meeting attendees that all comments must be submitted in writing. Requiring comments to be submitted in writing is a step that will help facilitate

[1] http://www.sunzia.net/documents_pdfs/26_sunzia_eis_noi_fed_reg_may_29_2009.pdf (last visited August 9, 2012).

public participation by ensuring that comments are accurately reflected in the project record, allowing BLM to respond to the comments.

The NOI is silent as to whether a comment period will follow publication of the Notice of Availability of the Final EIS. However, the BLM's website has a "Project Timeline" which reflects that following publication of the Final EIS there will be a 30-day "Public Protest Period." Alternatively, the Draft EIS indicates that there will be "a 30-day minimum comment period before the BLM may issue the Record of Decision." It is unclear if there is any difference between a "30-day Protest Period" (referenced on the BLM's website) and "30-day comment period" (referenced in the Draft EIS).

SunZia believes that the "30-day comment period" is one in which any member of the public or stakeholder may provide a comment on any issue related to the Final EIS, and that any such timely comment will be considered by the BLM in issuing a ROD. Conversely, SunZia believes that the "30-day Protest Period" is one in which a member of the public or stakeholder, including local units of government, may file a specific protest of the Proposed Resource Management Plan Amendment contemplated by this NEPA process. Consequently, SunZia would like clarification of BLM's intent regarding both the nature and duration of the review period(s) to be expressly described in the Final EIS.

II. Clarification regarding the role of the ACC as a relevant Decision-Maker.

The Draft EIS identifies "Decisions to be Made" and includes a list of six different agencies, including the BLM. Table 1-5 describes a "Summary of Potential Major Federal and State Permits or Licenses Required and Other Environmental Review Requirements for Transmission Line Construction and Operation." The ACC is listed in Table 1-5 but not in the section discussing "Decisions to be Made." Prior to construction, SunZia will have to file an Application with the Arizona Power Plant and Transmission Line Siting Committee and the ACC to acquire a Certificate of Environmental Compatibility ("CEC"). Therefore, the ACC has ultimate statutory responsibility for evaluating whether a particular configuration of SunZia, including any route in Arizona, will be granted a CEC and thus constructed in Arizona. This is an important point. Route Group 4 in Arizona includes Subroute 4C2c that is a portion of BLM's Preferred Alternative in the Draft EIS. Subroute 4C2c is located on BLM-administered lands for 14.9 miles (9%), with the remaining portions on Bureau of Reclamation-administered lands for 0.4 miles (.002%), State of Arizona-administered lands for 128.6 miles (80%), privately-held property for 17.4 miles (10%).

The NEPA process does not afford the BLM decision-making authority over the location of transmission alignments on non-federal lands in Arizona.[2] Notwithstanding any Final EIS or ROD, the ACC has the legal responsibility for granting SunZia the right to construct the project along on a particular alignment in Arizona.

Therefore, while the Draft EIS accurately indicates that the ACC will be a "State Permit [or License] Required . . . for Transmission Line Construction and Operation," SunZia requests that the ACC also be listed in the section entitled "Decisions to be Made," and that a description of the particular decision-making process regarding a CEC be provided. This clarification would be consistent with the Draft EIS's current treatment of agencies that have a decision to make in order for SunZia to come to fruition. *See e.g.* reference and description of the Bureau of Reclamation in Chapter 1 of the Draft EIS at § 1.10.

III. Clarification that the Southline Project does not currently have reasonably foreseeable future cumulative impacts on any component of the affected environment associated with SunZia.

Currently, the SunZia DEIS indicates that, "[a]s of January 2012, there is insufficient information on the [Southline] project and therefore cannot [it] be meaningfully evaluated in this analysis although the project is considered a reasonably foreseeable future action." Ostensibly, this statement is an acknowledgement that the Southline Project is still in its infancy. While the Draft EIS makes this statement, SunZia believes further clarification in the Final EIS would be helpful to explain and justify why the Southline Project does not have any reasonably foreseeable cumulative impacts on the affected environment associated with SunZia.

Specifically, the Southline Project was not a proposed action at the time the Draft EIS for SunZia was being developed. Moreover, the Southline Project had just initiated its scoping process at the time the SunZia Draft EIS was ultimately published. Therefore, at the point the SunZia Draft EIS was published the Southline Project was still receiving public and stakeholder input designed to help develop the range of reasonable alternatives and scope of its affected environment. Stated differently, at the time the SunZia Draft EIS was published, the Southline Project had not yet matured to a point where its reasonable range of alternatives or the scope of its affected environment had been fully-described, much less, finalized.

NEPA does not require an agency to consider in a Final EIS cumulative impacts from a future project that was not reasonably foreseeable at the time the Draft EIS was published. Therefore, the SunZia requests that in the Final EIS the BLM clarify and provide a consistent explanation as to why the Southline Project did not have, as of the date the Draft EIS was

[2] The BLM is the decision-maker regarding SunZia's application for use of BLM administered lands for a new utility right-of-way. Specifically, the BLM will decide whether to grant, grant with conditions, or deny the application for a new right-of-way. This decision may include modifying the route or location of the facilities on federal land.

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published, nor does it currently have, reasonably foreseeable cumulative impacts on the affected environment associated with SunZia.

Thank you for your time and consideration of these requests for clarification. If you have any questions or suggestions, please do not hesitate to contact me.

Sincerely,

Tom Wray
Project Manager
SunZia Southwest Transmission Project

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ENTIRE LIST OF DRAFT EIS COMMENTERS

ID	Last Name	First Name	Company
2396			ASLD
2072	Aber	MarieAurora	
1964	Abrahamson	Judy	
2038	Ackart	Lisa	
1519	Adkison	Lori	
1823	Aguilar	Felix	
2363	Ahyong	Valerie	
1610	Ajsic	Adnan	
1980	Albrecht	Kathryn	Rio Grande Agricultural Land Trust
1531	Alcock	John	
1771	Alcock	Dennis	
1617	Alexander	Allan	
1765	Allamong	Debra	
2431	Altman	Kathy	
2214	Alvarez	Ralph	
2013	Anderson	Lance	
2294	Anderson	Stacey	
2264	Anderssen	Saliane	
1892	Andresen	Celeste	
2263	Andrew	S.	
1475	Anonymous		
1483	Anonymous		
2426	Anonymous		
2434	Araiza	Alfredo	
2328	Armenta	Suzette	
2451	Armijo	Walter	Sierra County
2233	Arthur IV	Richard	
1553	Austin	Anne	
1718	Austin	Christopher	
2231	Austin	Rich	
1666	Austin	Bruce	Bowie Chamber of Commerce
1974	Babb	Kate	
2315	Bagshaw	Susan	
1600	Bahr	Sandy	Sierra Club - Grand Canyon Chapter
2296	Baier	Stacie	
1635	Baird	Arthur	
1932	Baker	Clifford	

ID	Last Name	First Name	Company
2164	Baker	Daniel	Cascabel Working Group
2234	Barnard	Richard	
2282	Barone	Sharon	
1941	Bartels	John	
1813	Bauer	Ernst	
2275	Beasley	Sasha	
1783	Begalke	Donald	
1942	Beilmann	John	
1672	Bell	Bridget	
1740	Bell	David	
2173	Bell	Pat	
2137	Belliard	Michel	
2316	Belt	Susan	
1649	Benavides	Lewis	Willow Springs Ranch Phase I Owners Association, Inc.
1492	Benford	Al	
1652	Benson	Betty	
1733	Benton	Dale	
2247	Bergman	Ron	
1881	Bergstrom	James	
1677	Berkel	Cady	
1542	Bernstein	Elizabeth	
2031	Bescript	Linda	
2260	Bescript	Ruth	
1833	Bettum	Gary	
1529	Bezy	Robert	
1651	Bickel	Bettina	
1994	Bierman	Kenneth	
1709	Bihler	Chris	
1474	Bishop	Bob/Laura	
2317	Bishop	Susan	
1741	Black	David	
1508	Blackwell	Lee	
1860	Blanchard	Harmony	
1488	Blodgett	Andrea	
1715	Blunt	Christine	
2170	Bobo	Orla	
1574	Bockman	Joan	

ID	Last Name	First Name	Company
2208	Boddy Jr	Philip	
1471	Bond	Martha	
1472	Bond	Leny	
1972	Bond	Karen	
1524	Bondy	Liz	
1954	Bosh	Joni	
1996	Botham	Kerah	
2115	Bourgois	Michael	
2050	Bowden	Lori	
1478	Boyd	Curt	
1903	Boydston	Jean	
2318	Brandes	Susan	
1527	Brewer	Linda	
2438	Brewster	Bill	
1983	Briggs	Kathy	
1505	Brook	Janet	
1990	Brown	Keith	
2039	Brown	Lisa	
2272	Brown	Sarah	
1856	Buccigrossi	Gwen	
2186	Buccigrossi	Paul	
1516	Burgess	Martha	Flor de Mayo
1690	Burns	Carolyn	
1896	Butkiewicz	Janice	
2222	Cage	Ray	
1641	Cain	Barbara	
2348	Calder	Tim	
1485	Caldwell	Larry	
2439	Call	Camille	
1882	Callegary	James	
1830	Campbell	Carolyn	Coalition for Sonoran Desert Protection
1722	Campos	Claudia	
1742	Cardinali	David	
1854	Carlo	Gregory	
1710	Carlon	Chris	
2074	Carney	Marilyn	
2372	Carr	Walt	
2015	Carroll	Laura	
2267	Castagno	Sandra	
2062	Cathey	Maggie	
2235	Causer	Richard	

ID	Last Name	First Name	Company
1558	Celmins	Lat	NRCD, Winkelman and Redington
2295	Champion	Stacey	
2218	Chandler	Randy	
1486	Chinkes	Joel	
2107	Chischilly	Melanie	
2350	Choate	Tina	
2425	Chopak	William	
1825	Clarida	Fran	
1642	Clark	Barbara	
1851	Clark	Glenn	
1904	Clark	Jean	
2099	Clark	Matt	Defenders of Wildlife
2100	Clark	Matt	Defenders of Wildlife
2116	Clegg	Michael	
1810	Clendening	Erin	
2048	Cloud	Lonny	
1664	Coate	Bonnie	
1675	Cohen	Buzz	
2117	Colbert	Michael	
2358	Cole	Tracy	
2382	Collins	William	
2469	Conger	John	Office of the Secretary of Defense
1984	Conner	Kathy	
1557	Cook	Pam & Jim	
1796	Cook	Elizabeth	
2118	Cooper	Michael	
1935	Coplin	Joel	
2174	Corbett	Pat	
1736	Cortney	Daniel	
1775	Corwin	Diana	
2076	Coryell	Mark	
2086	Cosacco	Martin	
2408	Cotignola	Michael	
1668	Cox	Brent	
2055	Cox	Luisa	
2077	Cox	Mark	
2119	Cozzi	Michael	
2057	Crandall	Lynn	
1514	Crane	Patrick	
2120	Crane	Michael	

ID	Last Name	First Name	Company
1691	Crews	Carolyn	
2159	Crim	Noel	
1985	Crist	Kathy	
1872	Critchley	Ian	
1544	Crole	Calvin	Windmill Ranches
2079	Crossland	Mark	
2281	Cummings	Shane	
1956	Cummins	Joseph	
2268	Cuthers	Sandra	
1989	Cyr	Karen	
1997	Dahl	Kevin	National Parks Conservation Association
1578	Dale	Jacqueline	
1877	Dale	Jacqueline	
2139	Dallam	Mike	
1699	Dalrymple	Charles	
1897	Danell	Janice	
1694	Darling	Carrie	
1614	Daue	Alex	The Wilderness Society
2450	Daue	Alex	Wilderness Society
1506	David	Paul R.	ADOT
1613	Davis	Alana	
2071	Day	Marian P.	
2059	Dayton	M	
2167	De Javelina	Olivia	
2249	De Lair	Ronald	
1835	De Nardis	Gayle	
2158	De Nardis	Nicole	
2342	De Vet	Therese	
1819	Debaun	Evelyn	
1525	Deierling	Rachel	
1927	Dejong	Joan	
1943	Deltogno-Armanasco	John	
2196	Deluca	Penny	
1659	Demerath	Bill	
2333	DePalma	Ted	
1883	Derrig	James	
2343	Deshayes	Thierry	
1674	Desilva	Bryan	
1499	Deters	Frances	
1774	DeVogel	Greg	WSMR

ID	Last Name	First Name	Company
2185	Diana	Patty	
2444	DiCenso	Remo	
1961	Dobkins	Judith	
2407	Doelle	William	Archaeology Southwest
1532	Donaldson	Brad	
2019	Donaldson	Laurie	
1816	Dong	Eva	
1523	Donovan	Melissa	
2080	Dorsten	Mark	
1779	Douglas	Dianne	
2156	Douglass	Natasha	
2246	Drake	Rogene	
1582	DuBois	Richard	
2442	DuBois	Barbara	
1704	Dufour	Cheryl	
2106	Dugan	Meg	
1700	Duncan	Charles	
2046	Dunn	Lois	
1606	Dunn	William	NRCD, Winkelman and Redington
1480	Durand	Francie	
1500	Durham	Virginia	
1849	Durham	Ginny	
1705	Eames	Cheryl	
1791	Eastoe	Chris	
2032	Eaton	Linda	
2197	Else	Peter	Friends of the Aravaipa Region
1502	Emerick	Roy M.	
1939	Enkoji	John & Juanita	
1521	Erdelyi	George	
1978	Erickson	Kathleen	
1838	Ernst	Geoff	
1621	Estrella	Andrea	
2230	Evans	Bob	
2240	Evans	Robert	
1928	Eveland	Joan	
2033	Fadem	Linda	
1780	Fanning	Don	
1481	Farmer	Jane	
1572	Feld	Jordan	Tucson Airport Authority

ID	Last Name	First Name	Company
1743	Felix	David	
1762	Felnagle	Deborah	
1634	Felsinger	Art	
1836	Ferguson	Gene	
2353	Ferguson	Tom	
2447	Ferguson	Nancy	
2421	Ffolliott	Charles	
2423	Ffolliott	Charlie	
2273	Fickling	Sarah	
1643	Field	Barbara	
2175	Figueroa	Pat	
2022	Fike	Lee	
2327	Fildes	Suzann	
2219	Filipic	Randy	
2065	Finnerty	Margaret	
1869	Finstrom	Holly	
2030	Flagler	Lila	
2179	Flickner	Patricia	
1884	Flood	James	
2063	Fordham	Malcolm	
1648	Forst	Barry	
2108	Foster	Melanie	
2300	Foster	Stephanie	
2347	Fotos	Tiffany	
2470	Frazier	Carol	
1528	France	Vicki	Desert Garden Design
1944	Franklin	John	
2368	Freeman	Victor	
1585	Freestone	Marie	Graham County Chamber of Commerce
1822	French	Felicia	
1729	Fritsch	Corinna	
2187	Frizane	Paul	
1538	Funk	Roger	
1473	Gage	Rick	
1470	Gage	Brad	Corona Landowners Assn.
1611	Gallant	Adrienne	
2420	Gammons	Joanne & Jay	
1503	Gammons	John & Joanne	Gammons Gulch Movie Set & Museum
1826	Garcia	Francis	
2461	Garcia	Joe	

ID	Last Name	First Name	Company
1631	Gardner	Anthony	
2216	Garland	Randall	
2168	Garza	Olivia	
1556	Gates	Joyce	
1653	Gelt	Bettylou	
1725	Genet	Cochise	
1512	Gerstman	Peter M.	Robson Communities
2270	Gibson	Sara	
1660	Gilchrist	Bill	
2105	Gillespie	Meaghan	
2354	Gilmore	Tom	
1564	Glade	Joe	
2301	Gladstein	Stephen	
2061	Glaser	Madeleine	
1893	Glover	Janet	
2191	Godlewski	David	Southern Arizona Home Builders Assoc (SAHBA)
1609	Goldfine	Adam	
1925	Gonzales	Jimmy	
2223	Goodwin	Ray	
1795	Gooze	Elene	
1682	Gossard	Carol	
1644	Goulding	Barbara	
1602	Graham	Patrick	The Nature Conservancy (AZ & NM)
1846	Gray	Geralee	
1601	Green	Paul	Tucson Audubon Society
2374	Greenwood	Warren	
1865	Greer	Helen	
2060	Greer	Mack	
2081	Grenard	Mark	
1589	Griffin	Debra	US EPA, Region 6
2102	Griffiths	Matthew	Tucson Audubon Society
2051	Grone	Lori	
1852	Guillory	Gloria	
1654	Haase	Beverly	
1721	Haddad	Cindy	
1776	Hadley	Diana	
2224	Hall	Ray	
2091	Halloran	Mary Jane	

ID	Last Name	First Name	Company
2360	Hamilton	Trish	
1590	Hamilton	Vicki	Department of the Army, Fort Bliss
2287	Hammel	Sherri	
1793	Hampton	Eileen	
1952	Hampton	Johnathan	
2001	Hanson	Kimberly	
1482	Harden	Paul	
2193	Hardman	Peg	Friends of the Bosque del Apache NWR
2028	Hartke	Leo	
2184	Hartmann	Patti	
2250	Hazelett-Weeks	Ronald	
1533	Heater	Sandra	
1545	Hedden	Chet	
2254	Heinekamp	Roselind	
1575	Heller	Janet	
1579	Henderson	Michael	
2400	Hendrix	Michael	
1885	Henriksen	James	
2150	Heyser	Nancy	
1962	Hicks	Judith	
2017	Hieb	Laurel	
2068	High	Mari Helen	
1999	Hill	Kim	
2283	Hill	Sharon	
1720	Hillstrom	Cindee	
1981	Hines	Kathryn	
2332	Hines	Taren	
1986	Hinson	Kathy	
2155	Hodapp	Natalie	
1522	Hoff	Catherine Jane	
1803	Hogan	Emily	
2454	Holcomb	Karen	
2455	Holcomb	Karen	
2456	Holcomb	Norman	
1618	Holloway	Allen	
2090	Holmeyer	Mary	
1513	Hostetter	Joyce	
1958	Hostetter	Joyce	
2114	Houghtaling	Michael andKathleen	

ID	Last Name	First Name	Company
2121	House	Michael	
1711	Houseman	Chris	
1552	Howard	Harry	
1853	Howard	Gloria	
2248	Hubert	Ron	
1773	Huckelberry	C.H.	Pima County Governmental Center
1768	Hudson	Denise	
1580	Hume	Lynwood "Woody"	
2422	Hume	Woody	
1744	Hummel	David	
2212	Hungerford	Rachel	
1809	Hunt	Erika	
1797	Hunter	Elizabeth	
1992	Hurlbut	Kelly	
2092	Ice	Mary Kennedy	
1988	Inman	Katie	
2394	Irvin	Robert	City of Willcox
2146	Isaacs	Mollie	
2014	Isenburg	Larry	
1862	Jackson	Hazel	
2140	Jacobs	Mike	
2274	Jacobson	Sarah	
2366	Jacobus	Vance	
1800	Jagger	Ellan	
1987	JanFrancisco	Kathy	
2151	Janigian	Nancy	
1655	Janowitz-Price	Beverly	
1857	Jarick	Gwendolyn	
1667	Jarvis	Brad	
2189	Jehle	Paul	
2010	Jenisio	Kurt	
1539	Jenkins-Sherry	Corliss	
1829	Jessberger	Frederick	
2289	Jeude	Shirley	
1966	Jlufi	Julie	
2180	Joe	Patricia	
1683	Johnson	Carol	
1716	Johnson	Christine	
1724	Johnson	Clay	
1917	Johnston	Jessica	

ID	Last Name	First Name	Company
2011	Johnston	Kyle	
1689	Jones	Carole	
1745	Jones	David	
1875	Jones	Jacki	
1937	Jones	Johanna	
2047	Jordan	Lois	
2200	Kadrich	Peter	
1680	Kanun	Carl	
1845	Karlovitz	Gerald	
1975	Katharine	Olmstead	
1757	Katten	DC	
1520	Keefe	Joe	
2424	Keleman		
1739	Kelly	David & Barbara	
2331	Kelly	Tanya	
1684	Kestler	Carol	
1686	Kestler	Carol	
2236	Kestler	Richard	
2362	Khoury	Valentina	
2016	Kiholm	Laura	
1916	Kilgore	Jerry	
1685	Klamerus	Carol	
1991	Kleberg	Keith	
2122	Knapp	Michael	
2123	Knapp	Michael	
2329	Knight	Sylvia	
1746	Kofoed	David	
1938	Kolsen	Johanna	
2103	Korbeck	Matthew	
2018	Kramer	Lauren	
2006	Krehbiel	Paul	Langmuir Laboratory group
1808	Kreider	Erika Anne	
2349	Krone	Timothy	
1681	Kroop	Carl	
2310	Kuendig	Sue	
2303	Kugler	Steve	
2007	Kuhn	Kristian	
2029	Kunkel	Leslie Kent	
1863	Kutch	Heather	
2276	Kyl	Jon	U.S. Senate

ID	Last Name	First Name	Company
1747	Labiner	David	
2002	Lackner	Kimberly	
2415	Lackner	Harold Bob	
2238	Ladd-Carpenter	Rita	
2138	Lalonde	Michel	
1543	Lancaster	Don	Synergetics
1627	Lands	Anna	
1922	Landua	Jim	
2075	Lange	Marilyn	
1785	Langlois	Donna	
1719	Lanksi	Christopher	
1487	Lannon	Albert Vetere	
1870	Lanus	Howard	
1790	LaPointe-Meyer	Drena	
1782	Laschiava	Dona	
1678	Lash	Cal	
1619	Laurel	Alna	
2052	Laurita	Lori	
2020	Laush	Diane M	BOR
1817	Lawrence	Evan	
1839	Lawrence	Geoffrey	
1923	Lawrence	Jim	
2334	Lawrence	Ted	
1967	Lawson	Julie	
1479	Leard	Lane	
2253	Leather	Rose Marie	
1708	Lee	Chih-Jie	
1814	Lee	Eron	
2124	Lee	Michael	
2453	Lee	Oliver	
2277	Lefler	Scott	
1693	Leigh	Carolyn	
1777	Lewis	Diane	
2464	Lewis	Barnaby	Gila River Indian Community
1748	Liers	David	
1749	Liers	David	
2064	Ligammari	Marci	
1625	Lilje	Ann	
1815	Linderkamp	Eugene	
2351	Littleman	Tina	
1645	Lloyd	Barbara	

ID	Last Name	First Name	Company
1629	Long	Annette	
1831	Loveland	Gail	
2239	Lowe	Rob	
2259	Lowes	Russell	Sierra Club Rincon Group
2190	Lucchini	Paul	
2176	Lukensmeyer	Pat	
1861	Lumley	Harry	
2207	Lunt	Richard	Greenlee County
1844	Luster	Georgia	
1864	Lytle	Heidi	
1911	MacDonald	Jennifer	
2436	MacFarland	Jennie	
2040	Machina	Lisa	
1930	Madden	Joanmarie	
2125	Maggied	Michael	
2084	Magruder	Marshall	
2169	Mahdavi	Omid	
2088	Maher	Mary Ann	
1973	Malcolm	Karen	
2034	Maley	Linda	
2288	Maley	Sherri	
1924	Malusa	Jim	University of Arizona
1878	Manning	Jacqueline	
1713	Marcus	Christina	
2387	Marcus	Ziporah Merle	
2009	Marie	Krystalya	
1953	Marini	Jon	
1850	Martin	Glen	
2215	Martin	Ralph	
2226	Martinez	Raymond	
2352	Martinez	Teresa Ana	Continental Divide Trail Coalition
1728	Martínez	Campos	
2177	Mathews	Pat	
1692	Maxon	Carolyn Jo	
1540	Mays	Robert	
1663	McAllester	Bonner	
2126	Mcblane	Michael	
1650	Mccandless	Beth Hall	
1963	Mcconnell	Judith	
1477	McCord	Cecilie Rosacker	Rio Grande Ag Land Trust

ID	Last Name	First Name	Company
1661	Mccormick	Bob	
1676	Mccormick	C Gene	
2054	McDonald	Lorraine	
1679	McDonald	Cameron	Cardon Hiatt Bowden
1537	McElvain	Guy	
1727	Mcglone	Colleen	
2045	McGrath	Laura	
1706	Mcgregor	Cheryl	
1646	Mcguire	Barbara	
2255	Mckenzie	Ross	
1534	McKimmie	Tim	
2292	McLaughlin	Sigrid	
1630	McMahon	Annie	
1750	Mcnabb	David	
1760	Mcnally	Debbie	
1828	Mcneill	Franklin	
2266	McSpadden	Sandi	
1604	Meader	Norm “Mick”	Cascabel Working Group
2160	Meader	Norm	Cascabel Working Group
2162	Meader	Norm	Cascabel Working Group
2163	Meader	Norm	Cascabel Working Group
2165	Meader	Norm	Cascabel Working Group
2390	Meader	Norm	Cascabel Working Group
2391	Meader	Norm	Cascabel Working Group
2392	Meader	Norm	Cascabel Working Group
2410	Meader	Norm	Cascabel Working Group
2412	Meader	Norm	Cascabel Working Group
1714	Meisenheimer	Christine	
1866	Mellen	Helen	
1867	Mellen	Eric	
1957	Mercado	Joshua	
1898	Miano	Janice	
1632	Mikols	April	
1751	Mileski	David	
1498	Miller	James	

ID	Last Name	First Name	Company
1707	Miller	Cheryl	
1894	Miller	Janet	
2319	Miller	Susan	
2419	Miller	Katie	
2448	Miller	William	Ft. Collins Audubon Society
2109	Mills	Melayne	
2326	Mills	Susen	
2112	Milnes	Melonie	
2110	Miloy	Melissa	
2127	Missell	Michael	
2210	Mitchell	Phillip	
1476	Mitchell	Matthew	Rio Grande Ag Land Trust
2278	Mittelsteadt	Scott	
1906	Miyasaka	Jeanne	
2220	Moe	Randy	
2093	Monell	Mary	
2344	Monforte	Thomas	
1806	Montgomery	Erica	
2035	Mooney	Linda	
1886	Moran	James	
1636	Morford	Arthur	
2237	Morford	Richard	
2141	Morgan	Mike	
2462	Morgan	Molly McKasson	
1633	Morgano	April	
1510	Morris	Scott	
1820	Morris	Everett	
1945	Morriss	John	
1717	Morrissey	Christine	
2290	Movahed	Sia	
1811	Mucci	Ernest	
1977	Mudge	Kathie	
2101	Mueller	Matt	
2201	Mullen	Peter	
2466	Murphy	Anson	Anson & Assoc., LLC
2073	Murray	Marilee	
2181	Murrell	Patricia	
1670	Myers	Biran	
1794	Navarro	Eleanor	
2104	Nealon	Maureen	

ID	Last Name	First Name	Company
2291	Neblina	Sierra	
1912	Neeley	Jenny	Sky Island Alliance
1615	Nelson	Alexandra	
1669	Nelson	Brett	
2056	Nesbitt	Lynda	
2241	Neuzil	Robert	
1919	Newhagen	Jill	
2293	Newman	Susan	
2418	Newman	Susan	
1876	Newman-Osmon	Jacomina	
1518	Newton	Douglas	
2202	Newton	Peter	
1591	Nicholopoulos	Joy	US Fish and Wildlife Service
2430	Noffsinger	Douglas	
1887	Nordlund	James	
1526	Notestine	James	
1888	Notestine	James	
1946	Nowlin	John	
2446	Nunn	Joe Bill	SW NM Grazing Association
2285	Obrien	Shelley	
1873	O'Connor	J	
2257	Odell	Ruby	
2377	Olsen	Wendy	
1752	Omick	David	
2161	Omick	David	Cascabel Working Group
2298	Oneill	Steph	
2182	Orlinski	Patricia	
2445	Orum	Tom	
2147	Osborne	Molly	
2000	Osgood	Kim	
2389	O'Shea	Helen	NRDC - Natural Resources Defense Council
1547	Otter	Elna	
1802	Otter	Elna	
1801	Otter	Elna	Al Gore’s Climate Reality Training in California
1933	Otto	Joe	
2320	Oviatt	Susan	
2128	Owen	Michael	

ID	Last Name	First Name	Company
1507	Padilla	James R.	
1581	Page	Joe	
1934	Page	Joe	
1546	Palmer	Jim	Graham County Board of Supervisors
1868	Parra	Henry	Public Lands Advisory Board for the Luna County Commission
1530	Parry	Ronald	Rice University
1763	Partington	Deborah	
1859	Patience	Hansi	
1515	Patterson	Daniel	Public Employees for Environmental Responsibility PEER.org
1603	Paulsgrove	Edward	USACE Albuquerque District
2463	Peacey	Vicky	Resolution Copper Mining
1890	Peddy	Jan	
2251	Pedersen	Ronald	
2194	Perley	Peggy	National Radio Astronomy Observatory
2144	Perry	Miles	
2337	Peterson	Teresa	
2066	Petterson	Margaret	
2369	Phelps	Victor	
1484	Phillips	Shelby	
1769	Piazza	Denise	
1840	Piedmonte	George	
1901	Pina	Jarni	
1576	Pinti	Barbara	
2370	Pinto	Victor	
2286	Pistorius	Shelley	
1855	Pitkapaasi	Greta	
2005	Pokorny	Kitty	Friends of the Bosque del Apache NWR Wildlife Refuge
1837	Polis	Gene	
2067	Popp	Margi	
1665	Poulos	Bonnie	
2433	Poulos	Bonnie	
2381	Powell	Wiley	
2227	Powers	Rebecca	
2367	Pratt	Vern	

ID	Last Name	First Name	Company
2449	Pratt	Frank	AZ House of Representatives
2306	Prchal	Steven	
2129	Prete	Michael	
2148	Prieto	Monica	
2069	Pugliese	Maria	
2416	Puglisi	Austin	
2417	Puglisi	Austin	
1767	Purdi	Dee	
2130	Quinlan	Michael	
1993	Quinn	Kelly	
1979	Quirk	Kathleen	
2217	Rafidi	Randall	
2203	Ragan	Peter	
1595	Rambler	Terry	San Carlos Apache Tribe
2355	Ramos	Tom	
1753	Ravenscraft	David	
1847	Read	Gina	
1730	Rector	Crystal	
2244	Reed	Robin	
1789	Reed-Inman	Dorothy	
2003	Reinhart	Kimberly	
1555	Renius	Kay	
1947	Reuland	John	
2004	Rhoads	Kirk	
2036	Rhyan	Linda	
2321	Ricci	Susan	
2008	Richter	Kristine	
2041	Ricker	Lisa	
1737	Rider	Dara	
1936	Rieck	Joel	
2131	Rifkind	Michael	
2371	Riggs	Vincent	
2265	Rings	Sally	
1766	Rios	Pete	Pinal County
1756	Rishel	Dawn	
2025	Rivera	Rhonda	Friends of the Bosque del Apache NWR
1900	Robert Beaudette	Janis & Robert	
1913	Roberts	Jenny	
1517	Robinson	Julia	

ID	Last Name	First Name	Company
1712	Robnett	Christie	
1905	Rodine	Jean	
2192	Rodis	Paula	
2311	Rodriguez	Sue	
1968	Roffler	June	
2242	Roffler	Robert	
1698	Rogers	Charlene	
1970	Rogers	Justin	
1770	Romesburg	Denise	
2399	Rosacker	Cecilia	Rio Grande Ag Land Trust
2308	Rose	Stormy	
1497	Roseboom	Marlene	
2166	Ross	Norman	
2178	Ross	Pat	
2243	Rosselli	Robert	
2345	Rossiter	Thomas	
1915	Roth	Jerome	
1593	Roybal	Julie	New Mexico Environment Dept
2232	Royer	Rich	
2228	Ruiz	Rene	
2211	Ruiz Cacho	Pilar	
2171	Rupprecht	Pamela	
2213	Russ	Rachel	
2378	Russell	Wendy	
2365	Ryan	Valerie	
1731	S	Cynthia	
1926	Sacksen	Joachim	Willow Springs Cattle Co., Inc. - Anam, Inc.
2432	Sadow	Todd	Epic Rides
1907	Saint-Amour	Jeanne	
1583	Sais	John	
2386	Sakhi	Zanda	
2460	Salcido	Art	Grainger - Branch 604
1788	Salerno	Doreen	
1982	Salm	Kathryn	
1723	Salmoni	Claudia	
1687	Salvati	Carol	
2441	Sanchez	Roland (Dr. and Mrs.)	Donaldson Ranch
2335	Sanders	Ted	
2058	Sandoval	Lysandro	

ID	Last Name	First Name	Company
2152	Santori	Nancy	
1772	Sassarini	Dennis	
2083	Sauer	Marlene	
2304	Savitch	Steve	
2305	Saway	Steve	
2142	Schacht	Mike	
1695	Scheffman	Cassandra	
1565	Scheidt	Gary	
2037	Schermer	Linda	
1969	Schmidt	Justin & Li	
1931	Schmidt	Joanne	Rio Images, FBDA
2012	Schmierer	Kyle	
1995	Schmitt	Kent	
1587	Schock	Bill	Arizona Natural Resource Conservation Districts State Association
2252	Schott	Rosann	
1832	Schuessler	Gail	
2132	Schuessler	Michael	
2133	Schumm	Michael	
1637	Schutt	Ashley	
1626	Schwab	Ann	
2437	Schwartz	Ivy	
1561	Schwarz	Oliver	
2468	Schwarz	Oliver	
2284	Scott	Sharon	
1586	Scott	George	Southeast Arizona Economic Development Group
1948	Seamon	John	
1588	Searle	Richard	Cochise County Board of Supervisors
1754	Secor	David	
2258	Seekatz	Russ	
2221	Serraglio	Randy	Center for Biological Diversity
2302	Shadow Wolf	Sterling	
1818	Shapiro	Eve	
1778	Shaw	Diane	
1807	Shearer	Erik	
1493	Sheldon	Donald C.	Windmill Ranch
1798	Sherwood	Elizabeth	
1688	Shinsky	Carol	

ID	Last Name	First Name	Company
1959	Short	Joyce	
2338	Shuster	Terrence	
1755	Simon	Dave	Sierra Club
1673	Singer	Brooks	
1560	Sjogren	Jon	
1562	Sjogren	Jon	
1671	Skow	Brian	
2443	Slaff	Steve	
1834	Smathers	Gary	
1638	Smith	Audrey	
1656	Smith	Beverly	
1657	Smith	Beverly	
1871	Smith	Hugh	
1920	Smith	Jill	
2098	Smith	Marysue	
2111	Smith	Melissa	
2245	Smith	Rodney	
2143	Snow	Mildred	
2279	Sobczak	Scott	
2225	Sol	Ray	
2053	Sollers	Lori	VC Ranch
1495	Solomon	Olivia & Alan	
2043	Spargo	Lise	Friends of the Bosque del Apache NWR
1571	Sparks	Barbara	
1758	Sparks	Deanie	
1759	Sparrow	Deb	
1899	Spencer	Janine	
2405	Spivey	J. Jay	Luna County
1566	Spragett	Eric & Cedra	
2339	Spurr	Terri	
2134	Stabile	Michael	
1976	Stainken	Katherine	Solar Energy Industries Association
1734	Stanbridge	Dale	
2346	Stander	Thomas	
2336	Stanger	Telly	Willcox Regional Economic Development Alliance
1909	Stanton	Jeff	
2297	Stanton	Bill	
1616	Stapleton	Alicia	
1786	Steele	Donna Lee	

ID	Last Name	First Name	Company
1914	Stefanow	Jenny	
1921	Stephens	Jill	
1781	Steuter	Don	
2145	Stevens	Mitch	
2280	Stevenson	Sebastian	
2097	Stewart	Marykay	
2153	Stewart	Nancy	
2271	Stock	Sara	
2307	Stockdale	Karyn	Audubon New Mexico
1960	Stoffers	Joyce	
2089	Strassell	Mary Fran	
2172	Stuart	Pamela	
2094	Suagee-Beauduy	Mary	
2314	Supplee	Vashti	Audubon Arizona
1701	Swanson	Charles	
2157	Sylver	Nenah	
1726	Taglieri	Colette	
2385	Taney	Winnie	
1910	Tanner	Jeff	
1841	Tapia	George	
1998	Tarbox	Kevin	Willow Springs Properties - Lennar
1549	Taunt	Linda	ADEQ, Water Quality Division
2373	Taylor	Walter	
2340	Tedesco-Kerrick	Terry	
1569	Tepper	Carol	
2082	Thaler	Mark	
1858	Thandi	Hannah	
1702	Thatcher	Charles	
2322	Thing	Susan	
1504	Thomas	Ronald J.	
2309	Thomas	Stuart	
2312	Thomas	Sue	
2357	Thomas	Toni	
1489	Thompson	Nikolas M.	
1491	Thompson	Angelina	
1812	Thompson	Ernest	
1490	Thompson Jr	Ralph	
2383	Thornton	William	
1658	Tiemann	Beverly	
1895	Tillotson	Janet	

ID	Last Name	First Name	Company
1536	Timmerman	Alan	
1622	Torres	Angel	
2204	Tredici	Peter	
2299	Tree	Steph	
1662	Trump	Bob	
1874	Tuber	Jack & Joy	
1496	Tuck	Diane	
2440	Tucker	Brett	
1880	Turner	Jake	
2087	Turner	Martin	
2149	Uditsky	Myrna	
1908	Urban	Jeannine	
1612	Urbany	Alan	
2429	Urias	Gilbert	
2467	Urias	Gilbert	
1624	Valdez	Anita	
1509	Van Denbos	Joan	
2229	Van Veersen	Marilyn	
1805	Vance	Eric	
1799	Venable	Elizabeth	
2384	Venuti	William	
1628	Vesowate	Anne	
2070	Vicens	Maria	
2395	Vivian	Vicki	City of Benson
2457	Vogel	Lisa	
2024	Vradenburg	Leigh Ann	Friends of the Bosque del Apache NWR
2042	Wager	Lisa	
1842	Wagner	George	
2262	Wagner	Ryan	
2401	Wagner	Betty	Aravaipa Property Owners Association
2313	Waid	Sue	
1902	Walker	Jason	
1787	Walkuski	Donna	
1494	Wallace	Michael	
2341	Wallace	Thea	
1647	Walrafen	Barbara	
2428	Ward	Martin	
1929	Warfield	Joan	
1703	Warner	Charles	
1640	Warren	Barb	

ID	Last Name	First Name	Company
2376	Warren	Greg	Continental Divide National Scenic Trail
1511	Warren	Dr. Barbara	PSR, Arizona
2206	Warshall	Peter	Peter Warshall and Associates
1918	Weaver	Jessica	
2021	Weaver	Lawrence	
2154	Weaver	Nanette	
1570	Webb	Elizabeth	
2330	Webb	Tamara	
2427	Webb	Elizabeth	
1697	Wegley	Chad	San Carlos Irrigation and Drainage District
1469	Wehnau	Karen	
1792	Weigel	Edna	
2095	Wellington	Mary	
2113	Weng	Michael and Iris	
2356	Wenzel	Tom	
1696	Wernz	Celeste	
2379	Wesley	Wells	
1605	Wessels	John	US DOI NPS
1843	West	George	
1535	Westenhaver	Anne	
1891	Whitaker	Jane	
1551	White	Robert	
1889	White	Jamil	
2096	White	Mary	
2324	White	Susan	
2325	White	Susan	
2380	White	Laura	USDA Forest Service, SW Region
1965	Whitehouse	Judy	
1639	Whitney	Audrey	
2135	Wichman	Michael	
1971	Wiggins	Karen Ann	
1764	Wilcox	Deborah	
1738	Wilhelm	Dave	
2323	Willis	Susan	
1804	Willson	Emily	
1821	Willy	F Joseph Willy	
2026	Wilson	Leland Wilson	

ID	Last Name	First Name	Company
1620	Wimp	Amy	
1949	Windes	John	AZGFD
2023	Winslow	Lee	
1950	Wise	John	
2359	Woods	Tracy	
1559	Wray	Tom	SunZia Southwest
1563	Wray	Tom	SunZia Southwest
1607	Wray	Tom	SunZia Southwest
2393	Wray	Tom	SunZia Southwest
2458	Wray	Tom	SunZia Southwest
2465	Wunder	Matthew	NMDGF
2459	Wunder	Matthew	NMGF
1827	Wyse	Frank	
2183	Yager	Patricia	

ID	Last Name	First Name	Company
1573	Yang	Daniel	RPV Partners, LLC
2361	Yazzie	Una	
1784	Yeager	Donald	
2195	Yeargain-Williams	Peggy	
1951	Yerger	John	
1732	Yolland	Cynthia	
2049	Zagula	Loraine	
2435	Zagula	Loraine	
2136	Zawoyski	Michael	
2261	Zemek	Ruth	
1761	Zickefoose	Debi	
1940	Zinn	John & Sandy	
1848	Zirtzman	Gina	

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