

Comment on Draft EIS for Proposed SunZia Southwest Transmission Project

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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.**

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

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

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

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.”

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.

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.

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