



August 22, 2012

Adrian Garcia, Project Manager
Bureau of Land Management
SunZia Southwest Transmission Line Project
P.O Box 27115
Santa Fe, NM 87502-0115
Submitted via electronic mail to NMSunZiaProject@blm.gov

Re: Comments on the Draft Environmental Impact Statement and Resource Management Plan Amendments for the SunZia Southwest Transmission Project

Dear Mr. Garcia:

The Center for Biological Diversity appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP) Amendments for the SunZia Southwest Transmission Project. The Center is a national non-profit conservation organization headquartered in Tucson, AZ, with more than 375,000 members and supporters, more than 10,000 of whom reside in Arizona and New Mexico. The Center is dedicated to the protection of threatened and endangered species and their habitats. Our members have a keen interest in the SunZia project and its impacts on the species and places we work to protect.

The Center has signed onto comments submitted by the Grand Canyon Chapter of the Sierra Club. As a member organization of the Coalition for Sonoran Desert Protection, we also support comments submitted by the Coalition, as well as those submitted by Cascabel Working Group, Defenders of Wildlife, Tucson Audubon Society, and Friends of Aravaipa.

In particular, we would like to highlight comments directed toward the purpose and need of this project and the process of analysis as it has been conducted to date. We believe that the consistent misrepresentation of this project as being primarily for renewable energy is damaging to the integrity of the process and the public's participation in it. Not only is there no guarantee that any of the power conducted through the lines will be renewable, it seems far more likely that it will primarily serve the natural gas interests of SunZia's investors.

Also, the BLM has utterly failed to encourage and accept public involvement at a level appropriate and necessary for such a controversial project. No true public hearings were conducted, even in the face of numerous written and oral requests from the public for such opportunities to comment. Moreover, for a huge, sprawling project that spans two states and impacts hundreds of sensitive areas and species of high conservation value and import, including several threatened and endangered species, the standard 90-comment period is

clearly inadequate to allow for proper analysis and comment on the DEIS by members of the public. Yet, despite numerous calls for an extension of the comment time period, the BLM refused, and even refused to make a decision on an extension until just before the comment deadline. We fear that this failure to uphold the spirit and intent of the National Environmental Policy Act has fatally compromised the integrity of this process.

For these reasons and others, the BLM should halt progress on this project immediately and reopen the public comment period. Considering the flawed process, the misleading purpose and need statements, and the many unacceptable impacts to important natural resources across two states, we reiterate that the “No Action” alternative is the only reasonable selection at this time.

Thank you again for considering our comments.

Sincerely,

Randy Serraglio
Southwest Conservation Advocate
Center for Biological Diversity