

Cascabel Working Group
6520 N. Cascabel Road
Benson, AZ 85602

Submitted electronically and by U.S. Mail December 27, 2014

Mr. Adrian Garcia, SunZia Project Manager
Bureau of Land Management
New Mexico State Office
P.O. Box 27115
Santa Fe, NM 87502-0115

Dear Adrian:

I submitted a comment letter to you on December 17, 2014 on the Environmental Assessment (EA) for the burial of SunZia lines across the Northern Call-Up Area for the White Sands Missile Range and would like to submit additional comments for the Cascabel Working Group. Further review of the EA raises several additional issues.

- 1. Lack of release of the MIT study.** Not releasing the Lincoln Laboratory's analysis of SunZia's impacts on the Call-up Area makes it impossible to know what the residual impacts to military operations are in the additional 30 miles of the area that SunZia crosses. At least some impacts should occur. Knowing what they were would help inform reviewer comments. In light of the enormous increase in technical complexity, cost, and, to some extent, time to complete the project under the Mitigation Proposal, moving the lines, even though the environmental analysis would require substantial time, yet seems more prudent and cost effective. This would save the project proponent many tens of millions of dollars, greatly reduce technical complexity, and keep the Call-Up Area pristine for testing.
- 2. The feasibility of the project.** On page 2-18 the EA states the following: "Another alternative was considered to construct and operate underground transmission facilities across the entire length of the Call-up Area but was eliminated from further consideration. Similar to the reasons above, *burial of the this portion of the Project is considered technically infeasible due to potential reliability concerns, operational risks, environmental impacts, and high construction cost.*"

If this statement is true, it applies to a significant degree to the Mitigation Proposal itself. The Proposal increases potential reliability concerns, operational risks, environmental impacts and construction costs, all of which make the project significantly less feasible. Rerouting the lines outside the Call-up Area would increase reliability, reduce operational risks, and dramatically reduce costs. Burying the lines over the 5.5 miles distance of the Mitigation Proposal increases the cost for that segment from approximately \$10 million to \$300 million or more. This increase is very damaging to the project and increases its infeasibility. The greatly added technical complexity, cost, and potential increase in construction time resulting from burying the lines brings into question whether this proposal is feasible or rational in itself.

3. **Spoils from trenches.** When the trenches for the burial of the lines are filled with concrete for the duct banks, many tens of thousands of cubic yards of rock and soil will be left over when the trenches are refilled. The fluidized slurry backfill and underlying concrete base surrounding the ducts will be 6.5 feet thick in itself. Only one foot of top soil is to be placed over the fluidized backfill. No provisions are given for how this large extra volume of rock and soil will be disposed of and stabilized.
4. **Restoration of trenched areas.** No provisions are given for restoring trenched areas. The FEIS does not discuss the types of impacts to vegetation associated with large-scale trenching. Specific restoration measures should be given for this type of ground disturbance.
5. **Impact on burrowing animals.** On page 3-24 the EA states the following: “The results of the Mitigation Proposal assessment indicate that when compared to the findings for the BLM Preferred Alternative in the Final EIS, the Mitigation Proposal would not result in new or substantially different impacts to biological resources.”

The difference in impact on burrowing animals and ground-nesting birds between constructing two overhead lines and excavating four parallel trenches each a minimum of 3.0’ wide and 6.5’ deep would be enormous. Which animals would be disturbed by this action? What is their likely density in the area, how rare is each species, and how large of a population may be affected by this action?

6. **Road use by concrete and cable trucks.** While the EA mentions the use of roads by concrete and cable trucks, the number of trips required by these trucks is not given and is an important measure of impact. If cement trucks can carry 8 cubic yards, it will require approximately 5,000 truck loads just to provide the concrete that surrounds the duct banks. The concrete for the overlying fluidized slurry backfill, which will be almost equivalent in volume, is not considered in this. This is a huge burden on local and state roads. It would seem advisable to categorize the roads that will be used and the potential impact on them.

If the cable is provided in 1500-foot rolls that are delivered one cable per truck, it will require 310 deliveries of cable, with each truck weighing approximately 75,000 pounds. Again, this usage has a considerable impact on state and local roads. Have state and local officials been notified of the potential impact of the concrete and cable trucks, both in terms of the number of trips and their weight?

7. **Required concrete production facilities.** What will be required to scale up ready-mix production in Socorro and Mountainair to provide the concrete? Can these facilities provide the capacity needed in the timeframe required? How much expansion will these plants have to undergo to support the project? In addition, no manufacturing facilities for 500-kilovolt underground cable exist in North America, and the cable will have to be transported long distances from seaports if it is manufactured overseas. The two-year time to manufacture, deliver, and install the cable seems much too short given the total lack of experience with the manufacture and burial of this size of line in the U.S.
8. **Dust mitigation.** While the EA states that the standard dust mitigation measures discussed in the EIS will be used, the impact of the trenching and this magnitude of traffic over county

roads and newly constructed roads will be vastly greater than the impact associated with constructing overhead lines. With the trenching and traffic involved, the difference in impact along this segment of the project is likely to be more than an order of magnitude greater. The EA should attempt to quantify this increase.

Concluding Statement

Given the magnitude of the environmental impacts associated with trenching and burial of the lines, the Finding of No New Significant Impact (FONNSI) does not appear justified. Environmental impacts will increase sharply with burial of the lines. Burying them is the equivalent of burying four major pipelines adjacent to one another. The width of the trenched area will be approximately 60 feet (15 feet between trenches, with trenches a minimum of 3 feet wide) in conjunction with 30 feet of disturbed area for the adjacent road. Vegetation will be stripped from most of this area, with tens of thousands of cubic yards of waste rock and soil left over after trenching that must be disposed of. Dust generation will potentially be orders of magnitude greater. Thousands of truck loads of concrete must be driven to the burial locations along with approximately 300 loads of cable. This is a huge additional impact upon roads. In addition, burying the lines greatly affects the economics and feasibility of the project. Thus the impact of the Mitigation Proposal is far reaching compared with the original plan for this area. This argues against a Finding of No New Significant Impact.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Norm 'Mick' Meader".

Norm "Mick" Meader
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