

July 12, 2011

To:

Adrian Garcia, Project Manager, SunZia Southwest Transmission Project
Bureau of Land Management
301 Dinosaur Trail
Santa Fe, New Mexico 87508

Information Quality Complaint Processing
U.S. Bureau of Land Management
1849 C. Street, NW
Washington, D.C. 20240

By:

Winkelman Natural Resource Conservation District
P.O. Box 68
Mammoth, AZ 85618

Redington Natural Resource Conservation District
P.O. Box 585
San Manuel, AZ 85631

REQUEST FOR CORRECTION OF INFORMATION CONTAINED IN SCOPING DOCUMENTS FOR THE SUN ZIA SOUTHWEST TRANSMISSION PROJECT

1) Request and Petitioners

This Petition (Request for Correction) is a formal request for the correction of information disseminated by the Department of Interior Bureau of Land Management (BLM) in scoping documents for the SunZia Southwest Transmission Project. This Request for Correction is made on behalf of the Petitioners, Winkelman Natural Resource Conservation District and Redington Natural Resource Conservation District, and is submitted under:

- Public Law 106-554- Section 515,
- Office of Management and Budget (OMB) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies, and
- BLM's Information Quality Guidelines.

Both Petitioners are Natural Resource Conservation Districts, local units of government of the State of Arizona, that are adversely affected by the dissemination of the information in question.

2) Petitioners' Contact Information

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3) Description of Information to Correct

This request pertains to the BLM's written statements of purpose and need for the SunZia Southwest Transmission Project, as disseminated to members of the public who either attended scoping meetings or requested inclusion on the BLM's mailing list. These documents constitute the entire packet of handouts received from the BLM during the scoping period by a typical member of the public expressing interest in the proposed project. No disclaimers were made by the BLM in any of these documents about the source or reliability of the information provided. The specific documents and statements of concern follow:

- A) U.S. Department of the Interior Bureau of Land Management
Public Scoping Notice for the Preparation of an Environmental Impact Statement for the SunZia Southwest Transmission Project, May 29, 2009
BLM document 2800 (93200) NM-114438
Second paragraph, fourth sentence, regarding statement of purpose
- B) BLM website page for the proposed SunZia project:
www.blm.gov/nm/st/en/prog/more/lands_realty/sunzia_southwest_transmission.html
As published during the entire scoping period (May, 2009 through September 2010)
Fifth paragraph, both sentences, regarding statement of purpose
- C) BLM Newsletter #1 for the referenced project, May 2009
Page 2, under "Purpose and Need", first, third, fourth, and fifth sentences
- D) BLM Release of July, 2009 (Extension of Comment Period), New Mexico State Office
Last sentence in the second paragraph (statement of purpose)
- E) BLM Newsletter #2 for the referenced project, October 2009
Page 1, under "Background", third sentence
- F) BLM Newsletter #3 for the referenced project, April 2010
Page 1, under "Project Background", third sentence

4) Explanation of Noncompliance with OMB and BLM Information Quality Guidelines and Recommendations for Corrective Action

Influential content.

The information described in this section is *influential*, as defined in the BLM's Information Quality Guidelines, because it is, quoting these Guidelines, "highly controversial information that is used to advance the BLM's priorities." In this case, the speculative nature of the information presented and the significant effect this information could have on the public's willingness to accept impacts to the landscape along the proposed route indicate that this information is "highly controversial". Regarding the advancement of a BLM priority, the BLM has a Federal mandate under the Energy Policy Act of 2005 to approve at least 10,000 MW of non-hydropower renewable energy on public lands by 2015. Thus, the information in question is consistent with the Guideline definition of the term *influential*. Influential information requires an added level of scrutiny under OMB and BLM guidelines, and is afforded this scrutiny in the correction and disclosure requests that follow.

Statement claiming predominance of renewable energy resources.

Documents A, B, C, and D in the above list include the statement that the purpose of the proposed SunZia project "...is to transport electricity generated from power generation resources, including primarily renewable resources, to western markets and load centers". The qualifier "including primarily renewable resources" is speculative, and therefore is contrary to OMB and BLM criteria for objectivity, according to their respective published guidelines. The BLM and the project sponsors do not have control over whether the energy on the proposed line will include primarily renewable resources. As a result, the Petitioners request that the phrase "including primarily renewable resources" be dropped from this statement of purpose. The Petitioners also request that the BLM disclose in writing that due to Federal policies on granting access to transmission lines and to economic factors, it is difficult to predict the ultimate makeup of generation sources on the proposed line(s). The Petitioners recognize that the proposed project would offer access to potential renewable energy resources, but request that any statement describing potential resources include both renewable and non-renewable forms.

Statement characterizing the focus of the proposed project

Documents E and F in the above list include the statement, "The project is focused on delivering renewable energy resources to the western United States by providing an expected 3,000 megawatts or more of new transmission capacity." BLM guidelines for objectivity require that influential information be "...presented in an accurate, clear, complete, and unbiased manner". The origin and the anchor generation resources of this project do not support the statement that the proposed project is focused on delivering renewable energy (see Attachment A for documentation on the history and proposed uses). The first two years of this project's five-year history were focused principally on non-renewable energy resources. The history documented in Attachment A provides only speculation on what will be the focus of energy resources for this particular transmission project. The original main "trunk" of delivering high-reliability non-

renewable resources remains, and the extent of development of less reliable renewable resources is speculative, as few, if any, renewable energy generation facilities have been permitted or built along the route of the proposed line. In order for the statement on the focus of the project to be presented in an unbiased manner, the Petitioners request that the word "*renewable*" be removed, since the proportional mix of renewable and non-renewable energy resources has not been determined.

By focusing on *potential* renewable energy resources to the exclusion of *imminently pending* non-renewable resources, the BLM is misleading the public about the focus and purpose of this project. The Petitioners request written disclosure that the majority owner of the SunZia project is also the owner of the planned and permitted gas-fired 1000 MW Bowie power plant, and to disclose any other permitted or existing projects within the project area that are postponing construction or expansion until transmission capacity is created. Not disclosing this information is contrary to the BLM's Information Quality Guideline on transparency. The fact that the Bowie plant will require transmission capacity before it can be fully developed indicates that the majority owner may have as much interest in providing transmission capacity to stranded non-renewable resources as in providing this capacity to stranded renewable resources.

Statement related to the creation of transmission access.

Documents B and C include the statement, "*The SunZia project would enable the development of renewable energy resources including wind, solar, and geothermal generation by creating access to the interstate power grid in the Southwest.*" In order for this statement to be unbiased and objective, it must state that the project would enable the development of both non-renewable and renewable energy resources, and if specific forms of renewable energy are specified, then specific forms on non-renewable energy must also be specified. Unbiased presentation of information would indicate that it is not the BLM's role to sell a project to the public on the basis of one feature that is in the BLM's interest to promote. As noted above, renewable resources are not the only "stranded" generation sources along the proposed line(s). The Petitioners request that this statement and any others related to transmission access include all forms of energy that may be developed and transported along the proposed lines, either through general category (non-renewable and renewable), or by specific type within a category.

Additionally, the Petitioners request that the BLM disclose that the project sponsors are not obliged to build the entirety of an approved designated route, thus potentially affecting transmission access. This disclosure could come in the form of a statement that clarifies the limited role of the BLM in overseeing the environmental study, and stating that it is the project sponsor's role to determine if, when, and to what extent the project is ultimately developed, based upon economic and regulatory factors.

Statement related to Renewable Energy Standards.

Document C contains the statement that the proposed project "...would enable several states to meet their Renewable Energy Standards [RES]", and a table listing Arizona, California, New Mexico, and Nevada is referenced. No evidence is provided that "several" of these states would

be unable to meet these standards without the proposed project, and the amount and makeup of the renewable energy resources that the proposed transmission project would actually transport is unknown. Arizona has transmission plans and more than sufficient local resources to meet its modest RES, even if the proposed project does not move forward. New Mexico can meet its RES with transmission lines that do not cross its borders and is moving toward that goal with other in-state projects. The most one can objectively state is that the proposed project has the potential to aid several states in meeting their RES. In order to meet standards of objectivity, the Petitioners request that this statement eliminate inference of necessity for meeting Renewable Energy Standards.

Statement related to power reliability

Document C contains the statement, *"The SunZia Project would also increase power reliability across the southwestern United States, allowing communities in southern Arizona and southern New Mexico to economically access energy generated from renewable resources, while providing power to help meet growing demand in the western United States and enhance domestic energy security."*

The core of this statement, "The SunZia Project would increase power reliability across the southwestern United States while providing power to help meet growing demand in the western United States and enhance domestic energy security", would have been the most objective and historically substantiated statement of purpose found in the BLM's scoping documents had it not included the phrase that attempts to characterize the project as being more focused on renewable energy than on non-renewable energy. The issue of power reliability is much more related to providing transmission alternatives in the western grid and providing reliable energy resources than to promoting economical access to renewable energy. By stretching to make a connection between power reliability and economical access to renewable energy, the BLM strays from its role as a neutral party by appearing intent on inserting the words "renewable energy" into almost every statement of purpose.

Beyond this bias, the claim that the project would allow communities in southern Arizona to economically access energy generated from renewable resources is also problematic. There is no evidence that importing low-reliability renewable energy over long distances is more economical than utilizing higher-reliability local sources of renewable energy, particularly if the supply of these distant energy resources is not synchronized with demand, as is the case with the potential wind resources of central New Mexico.

For all of the above reasons, the Petitioners request that the BLM eliminate the phrase *"allowing communities in southern Arizona and southern New Mexico to economically access energy generated from renewable resources"* from its statement related to power reliability.

Systematic bias in the BLM's scoping documents.

The previous requested corrections all relate to specific statements that the Petitioners find were not presented objectively. Taken together, these statements indicate a systematic bias by the BLM in presenting the statement of purpose for this project. Further evidence of systematic bias

follows: In all six BLM documents described in Section 3 of this petition, no reference was made to non-renewable energy resources or to the term "fossil fuel". Natural gas generation, considered in SunZia's historical documents to be the most reliable and predominant anchor source of energy for their project, was never mentioned in these BLM documents. In contrast, these same documents contain a total of 20 references to the term "renewable energy" and to the various forms of renewable energy, not including the pictures of wind generators that were used as an artistic backdrop in some of these BLM documents. The Petitioners request written disclosure that the proposed project would transport non-renewable energy resources, such as those generated from gas and coal.

Due to systematic bias in the scoping documents given to the public, the proposed project's statements of purpose were not presented to the public in an accurate, clear, complete, and unbiased manner, as required by the BLM's Information Quality Guidelines. The results of this presentation were consequential. Comments submitted by groups and individuals during the scoping period were clearly influenced by the emphasis on renewable energy to the exclusion of non-renewable energy. Hundreds of comments lauded the BLM's stated purpose of the project. Media coverage was also influenced. Attachment B contains two newspaper articles that demonstrate how this presentation influenced media coverage of the proposed project's purpose in the local region of the Petitioners, specifically related to the unsubstantiated claim that the transmission project would deliver primarily renewable energy.

Utility is vital to information quality. The exclusive emphasis on renewable energy does not adhere to the BLM's Information Quality Guidelines related to utility, because the information did not provide the public with a realistic basis for assessing the project's purpose and necessity. The public was not provided a sufficiently useful and unbiased statement of purpose during the scoping period, and this presentation had clear consequences on media coverage and public perception. The BLM strayed from its role as a neutral party and ventured into the role of project proponent.

As a result, the Petitioners request that the scoping period for the proposed project be reopened for a period of at least 45 days, with associated publicity materials to include the four specific requested disclosures and specific requested corrections made to each statement referenced in this petition, all compiled into a revised written statement of purpose and need for the proposed project. This statement would be developed, substantiated, and reviewed for objectivity, transparency, and utility by the BLM, in accordance with its Information Quality Guidelines. This statement would be published and disseminated, before the beginning of the 45-day comment period, to the same media outlets and to the same public and stakeholder distribution lists used for the prior comment period. In order to avoid any further delay, the Petitioners offer to work with the BLM in drafting a revised statement of purpose that incorporates the requested disclosures and corrections into a balanced and objective presentation. If the BLM acts on this request in a timely manner, it would be able to complete this correction well before the current expected release date of the draft Environmental Impact Statement. The Conservation Districts are requesting expedited review of this Petition, because it has come to their attention that one of their members made a request for correction regarding the same issue on September 28, 2010. This request was never provided with a response, contrary to the BLM's Information Quality Guidelines.

Purpose of scoping period.

As stated in the BLM flyer (Attachment C) presented to attendees of the scoping meetings , “*The Council of Environmental Quality (CEQ) regulations require scoping meetings to be conducted in support of the EIS [Environmental Impact Statement] process pursuant to the National Environmental Policy Act of 1969 (NEPA). Scoping is the process by which the BLM is soliciting input on the issues, impacts, and potential alternatives that will be addressed in the SunZia Southwest Project EIS, as well as the extent to which those issues and impacts will be analyzed.*” With the statement of purpose presented by the BLM and with key information not included in scoping period documents, the public was not provided with the accurate information necessary to objectively discuss and evaluate the purpose and necessity of the proposed project. The statements of purpose presented by the BLM convinced most of the public and media outlets that this proposed transmission project was uniquely designed to provide access for renewable energy resources. The history of the proposed project does not fully support this perception.

In order for the public to assess the tradeoffs inherent in a major infrastructure proposal, route alternatives and potential impacts must be considered within an objectively presented context of purpose and need. The consequences of presenting influential information about the proposed project’s purpose in a systematically biased manner over a long period of time have been significant. These consequences must be addressed commensurately, and in a manner that allows the public to exercise its right to provide input prior to the release of the draft EIS based upon fully disclosed and objective information related to both the “shovel ready” and potential generation sources along the proposed transmission lines. Then, through written and transcribed oral comments submitted during the additional comment period, the BLM can determine the extent to which various issues will be addressed in the Environmental Impact Statement, as intended by CEQ regulations. The New Mexico office of the BLM was notified in great detail last September by at least two members of the public that their statements of purpose were not accurate, and a request for correction was made at that time. The Petitioners request expedited corrective action in order to fulfill the intent of CEQ regulations related to the scoping process.

Respectfully submitted,



William Dunn, Winkelman NRCD



Andrew Smallhouse, Redington NRCD

Attachments:

- Attachment A (Documentation of the History and Proposed Uses of the SunZia Transmission Project)
- Attachment B (Newspaper Coverage in the Petitioners' Region During the Scoping Period)
- Attachment C (BLM Description of the Scoping Process and CEQ Regulations)

Attachment A

Documentation of the History and Proposed Uses of the SunZia Transmission Project

I. Initial Characterization of the SunZia Project

The first outline of the SunZia Project was provided in the minutes of the October 18, 2006, meeting of the Southwest Area Transmission Regional Planning Group (SWAT)¹ and an accompanying presentation by Mark Etherton², consultant to the Southwestern Power Group (SWPG). The meeting minutes characterize the SunZia Project as the following:

- *Two 500 kV lines out of Bowie [SWPG's permitted Bowie power plant], one going east, one going west.*
- *Will create transmission path from southern New Mexico to southern Arizona.*
- *Southwest Power Group interested in 50% ownership.*

Etherton's associated presentation characterized the SunZia Project in the following way:

- *Bowie (SWPG II) interested in assisting with development of new 500kV line in/out Bowie*
- *Southern New Mexico to Southern Arizona with segments in-service as early as 2011*
- *Participation Project with other interconnections as requested by Participants (e.g. Luna, Winchester, etc.)*

II. Presentation to the Western Electricity Coordinating Council

The SunZia Project is more fully characterized in a SunZia presentation to the Western Electricity Coordinating Council (WECC) on May 15, 2007³. The project description is as follows:

Currently, SWPG (and interests received to date) anticipates that SunZia will consist of the following major facilities:

- *Construction of approximately 150 miles of 500kV line from the proposed 600MW IGCC Bowie Power Station near Bowie, Arizona, to the proposed Pinal South substation, located near Coolidge, Arizona. A probable intermediate interconnection point (and transformation) between these two terminations is the existing Winchester substation, located near Benson, Arizona, approximately 50 miles west from the proposed Bowie Power Station. Winchester and Pinal South are part of the original Central Arizona Transmission System ("CATS") EHV long range plan and has been developed for a future 500 kV interconnection.*
- *Construction of approximately 185 miles of 500kV line from the proposed Bowie Power Station to the existing Newman substation [connection for the five-unit, 700- to 800-MW natural gas Newman Power Station] near El Paso, Texas. A probable intermediate interconnection point (and transformation) between these two terminations is the existing Luna substation [connection for the 570-MW Luna Energy Facility], located near Deming, New Mexico, approximately 100 miles east from the proposed Bowie Power Station.*

Attachment A (continued)

Additional comments in this presentation include the following:

- *SunZia is initially envisioned to provide an additional interconnection opportunity for the proposed Bowie Power Station (proposed as a 600MW IGCC). SunZia can provide a delivery path to multiple markets versus a single interconnection location; both in southern New Mexico (and El Paso, Texas) and to southern Arizona.*
- *Thus far, the interest in SunZia has been from 1,500-3,000MW for delivery of the renewable and thermal [coal and natural gas] resources throughout the SunZia proposed study area, as well as some potential local load serving opportunities.*

Note that at this time SunZia terminated about 150 miles south of the principal wind-generating area of central New Mexico, the closest high-quality wind resources now being considered for development. With this project scenario, use of SunZia by developers of New Mexico wind would require that they construct about 150 miles of their own transmission line to interconnect with SunZia. Development of the renewable resources – solar and geothermal – along the actual route is much more hypothetical because these would require federal subsidies.

III. Presentation to the Southwestern Renewable Energy Conference

On August 1, 2007 Mark Etherton, consultant to SunZia, gave a presentation to the Southwest Renewable Energy Conference on the SunZia Project⁴ in which he noted *Capacity Interest*, that is, who would be interested in purchasing transmission capacity and how much, an essential consideration in justifying the economic viability of a project. The Southwestern Power Group's Bowie power plant was listed first with an interest of 600 MW, the full rating of the plant using coal gasification technology.

The other potential interests listed included 6-10 non-specific entities interested in a total of 1500-3000 MW of capacity. Because at this stage the SunZia Project terminated about 150 miles from the principal wind-generating area slated for development, these entities presumably included at least some of the natural gas plants in southwestern New Mexico that would be adjacent to the line. These plants include the 80-MW Lordsburg generating station, the 160-MW Pyramid generating station (near Lordsburg), the 570-MW Luna Energy Facility at Deming, and the 235-MW generating station at Afton. The following proposed SunZia substations would provide interconnections for these plants: (1) *Midpoint substation* – Afton generating station and Luna Energy Facility, (2) *Lordsburg substation* – Lordsburg and Pyramid generating stations, and (3) *Willow substation* – Bowie power plant.

IV. Relationship to the High Plains Express Project

In the summer of 2008 the SunZia Project was restructured and extended to the wind-generating area of central New Mexico, taking over the full southern leg of the High Plains Express Project (HPX), which had proposed to build two separate 500-kV lines to Phoenix from the area. In its *Stage 1 Feasibility Study*⁵ HPX makes this statement (page 17): “*For this study, the SunZia*

Attachment A (continued)

project was considered to be an integral segment of the HPX Project. Therefore, a separate SunZia project was not modeled.” In that study HPX examined both daily and seasonal variations in wind energy output and the physical and economic problems related to this variability.

HPX determined that a system carrying entirely renewable energy was not economically or physically feasible, making this statement (page 6): “*A „balanced“ scenario consisting of near equal amounts of fossil and renewable energy [generating capacity?] performed the best under a range of circumstances*”. Because of the much lower dependability factor for wind, the majority of the energy in the system would likely be generated by fossil fuels. A system dedicated to renewable energy would use on average only about one-third of the system’s transmission capacity, which is not economic. A 75% average usage is optimal. HPX is assuming that most of the new fossil-fuel generating capacity connected to the system to achieve this will be natural gas.

At the end of its report, HPX listed questions and answers regarding the project. The following question specifically addresses this mix of energy sources in the system:

Q1. What is the planned generation resource mix for HPX?

- *HPX is planned to enable renewable and other economic resource [that is, coal and natural gas] development.*
- *Dispatchable resources [conventional fossil fuel; hydro is possible but highly unlikely] are needed to maximize transmission utilization to firm renewables [compensate for their great short-term variability in output].*
- *Studies indicate that economics (B/C ratios [benefit/cost ratios]) are most favorable with renewable/fossil resource mix [50/50 mix].*
- *Fossil-only and Renewable-only scenarios were the least favorable.* (page 39)

In addition, an associated HPX PowerPoint presentation⁶ makes the following statements:

- *Renewable resources will have to be blended and supported with “dispatchable” [nonrenewable] resources.*
- *HPX is a “fuel neutral” initiative, as its customers will dictate the fuel mix.*
- *Renewables are expected to be a significant part of the HPX resource mix, particularly wind and solar.*

Note in the last item that renewables are expected to be a *significant* part of the mix, not the *primary* part of the mix.

¹ SWAT Meeting Minutes, 10.18.06, Las Vegas, page 3. Available from http://www.westconnect.com/filestorage/swat_mtg_min_101806.pdf. Accessed June 24, 2011.

Attachment A (continued)

² Mark Etherton, “SunZia Southwest Transmission Project,” SWAT Steering Committee, October 18, 2006, slide 8. Available from http://www.westconnect.com/filestorage/swat_sun_zia_status_101806.pdf. Accessed June 24, 2011.

³ SunZia, “WECC Regional Planning Project Report on the Proposed SunZia Southwest Transmission Project,” May 15, 2007. Available from http://www.wecc.biz/committees/StandingCommittees/PCC/TSS/Shared%20Documents/Projects%20Undergoing%20Regional%20Planning%20Rating%20Review/SunZia%20Southwest%20Transmission%20Project/SunZiaRPPR_Final_051507.pdf. Accessed June 24, 2011.

⁴ Mark Etherton, “Presentation to the Southwest Renewable Energy Conference on the Proposed SunZia Southwest Transmission Project,” August 1, 2007, slide 19. Available from <http://www.swrec.org/2009/conf2007/docs/presentations/PP%20Etherton%20Mark.pdf>. Accessed June 24, 2011.

⁵ “High Plains Express Transmission Project Feasibility Study Report,” June 2, 2008. Available from http://www.highplainsexpress.com/site/static/feasibilityStudyPDFs/HPX_First_Stage_Feasibility_Report.pdf. Accessed June 24, 2011.

⁶ “High Plains Express, A roadmap for transmission development to benefit consumers in Wyoming, Colorado, New Mexico and Arizona,” slide 5, June 2, 2008. Available from http://www.rmao.com/wtpp/HPX/HighPlainsExpress%20First%20Stage%20Feasiblity%20Powerpoint%2006_08.pdf. Accessed June 24, 2011.

Attachment B

(Newspaper Coverage in the Petitioners' Region During the Scoping Period)

BLM asks input on 460-mile power line

By Dale Quinn

ARIZONA DAILY STAR

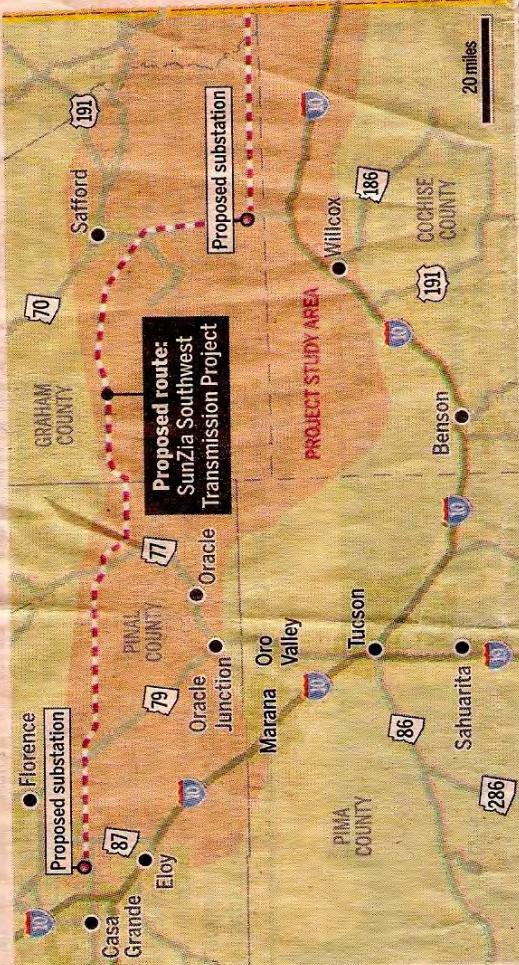
The Bureau of Land Management is seeking public input about a 460-mile transmission line planned to stretch across Southern Arizona and New Mexico that could provide energy for up to 500,000 homes.

The SunZia Southwest Transmission Project will primarily transport power from alternative sources such as wind and solar to meet growing energy demand in the western United States, said project manager Adrian Garcia.

So far no energy companies are set to receive the power.

The proposed corridor for the project begins at the site of a new substation in central New Mexico, then dips south and extends west through Arizona, near Safford and north of San Manuel to Pinal County. "What we're trying to do is develop a site that has the least amount of impact," Garcia said.

The project is proposed to have two parallel lines with



6/04/09

OPEN HOUSES ALONG PROPOSED CORRIDOR

- N Main St., Eloy, June 23 at Oracle Community Center, 685 E. American Ave., Oracle.
- June 24 at Manor House Convention Center 415 E. Highway 70, Safford.
- June 29 at Valley Telephone Company Conference Room, 752 E. Maley St., Wilcox.

The BLM will host nine open house meetings in upcoming weeks in New Mexico and Arizona along the corridor being studied for the power line. Arizona meetings will be from 5 to 8 p.m. at these dates and sites:

- June 22 at Santa Cruz Valley Union High School cafeteria, 900

June 4, 2009

Attachment B

(Newspaper Coverage in the Petitioners' Region During the Scoping Period)

New routes proposed for SunZia high capacity power line

By Lana Jones

The Bureau of Land Management (BLM) hosted an open house in Tucson last week on new routes for a proposed high capacity electric transmission line in New Mexico and Arizona. The line is part of the SunZia Southwest Transmission Project proposed by SunZia Transmission LLC. It would transport electricity on 460 miles of 500 kilovolt lines through New Mexico and Arizona. The electricity transported would be primarily generated by renewable resources.

Many routes are under consideration for the lines. The routes run from central New Mexico first south, then west under the BLM's direction.



Adrian Garcia is the BLM project manager and contact for SunZia Environmental Impact Statement process. (Lana Jones photo)

he said. As a result of these meetings in 2009 to discover what issues the public wanted considered in the EIS and to solicit comments. "The meetings were held in communities across Arizona and New Mexico that might be affected by the project. Concerns over proposed routes running through the San Pedro Valley brought up during the 2009 meetings led to last week's open house.

Linwood Smith, biological services manager of EPG, said that the response to routing the transmission line through the San Pedro River Valley had been universally negative. "I've not talked to anybody who thought it was a good idea," he said. "Birders come here from all over the world, which could lead to more and more tourist dollars for our communities, but not if the birds are being killed by power lines and losing their habitat to development."

New routes through Pima County that would bypass the San Pedro will likely have their own problems. "Conflicts with these Tucson alternatives are really intense," said Smith.

The open house provided an opportunity for the public to learn about the new routes and to provide feedback. The comment period has also been extended to June 10, 2010.

Ian Calkins, spokesman for SunZia, said the BLM right-of-way permit was vitally important to the project. "Without that right of way permit from the BLM, we simply would not be able to proceed," he said.

SanZia is spending millions of dollars on permitting processes, for the BLM permit and others. "The BLM process is probably the one that takes the most amount of work to get because it's such an extensive environmental process," Calkins said.

SanZia's primary goal in going through all the work of permitting is to access renewable energy resources in New Mexico and Arizona. Calkins said that getting renewable energy from where it's created to where it's needed is the greatest challenge to using renewable resources today. "There are tremendous wind and solar resources in New Mexico and Arizona," he said. "The See SunZia, Page 10

Attachment C
(BLM Description of the Scoping Process and CEQ Regulations)

SunZia Southwest TRANSMISSION PROJECT

WELCOME Scoping Meeting Open House

Welcome to the public open house for the SunZia Southwest Transmission Project Environmental Impact Statement (EIS).

Purpose

This open house is to provide an opportunity for the public to review the proposal and project information, ask questions, and offer input. The format is designed to encourage one-on-one communications about the project. With this format, there will not be a presentation.

The Council of Environmental Quality (CEQ) regulations require scoping meetings to be conducted in support of the EIS process pursuant to the National Environmental Policy Act of 1969 (NEPA). Scoping is the process by which the BLM is soliciting input on the issues, impacts, and potential alternatives that will be addressed in the SunZia Southwest Transmission Project EIS, as well as the extent to which those issues and impacts will be analyzed.

Stations

Stations are set-up around the room to provide details about the project. Representatives from the project team are available to answer questions and listen to your comments.

Register Comments

Please submit your written comments either:

- Before you leave today
 - ✓ Using comment form, or
 - ✓ Speaking with attending court reporter
- Online at <http://www.blm.gov/nm/SunZia>, or
- By mail

Please submit written comments by June 10, 2010 even if you have spoken to a project team representative, as this will help us keep track of the input we receive.

Thank you for your interest in this project.