

3443 E. Lee Street  
Tucson, AZ 85716 (personal address)  
August 1, 2013

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

Dear Mr. Garcia and Mr. Juen:

I am writing to express deep concern about how the Environmental Planning Group (EPG) and the Bureau of Land Management have responded to public commentary on the SunZia Draft Environmental Impact Statement. The National Environmental Policy Act (NEPA) places great emphasis on the importance and integrity of public involvement, which has been badly compromised by how this was handled. It is the EIS contractor's responsibility to work with the public to incorporate comments in the best way possible, most importantly any that may be substantive. Impartiality and openness to information are essential. EPG has failed to achieve this.

Many organizations and individuals, myself included, put enormous time and thought into the comments that they submitted. In almost every case, EPG has dismissed even the most substantive comments, often with incomplete, tangential, condescending, or unrelated arguments. To justify this sweeping dismissal of public input, EPG must argue that essentially no one's comments were valid or worthy. This is not realistic or possible. EPG's treatment of public commentary reflects an overwhelming disregard for the true purpose of the process.

EPG personnel appear much too focused on merely fulfilling NEPA's administrative requirement to respond somehow and expediting the BLM's issuance of a Record of Decision. They have not acted to ensure that the EIS includes the most complete information possible, especially regarding the project's potential use and possible alternatives for achieving its objectives. Those personnel responding to comments have not taken the time to correct and strengthen the EIS as it should be.

I understand the enormity of the task this company faces in overseeing this responsibility. The sheer volume of public comment makes responding in a timely way very difficult. However, this volume of comment demonstrates how deficient the EIS is and the work yet required to meet NEPA's standards. While many reviewer comments can be addressed with relatively straightforward explanations, others cannot be and require additional research and revision of the EIS. In most cases EPG has not done this.

While routing this project may seem a foregone conclusion to many, this does not mean that public commentary is of no consequence and that one can justify dismissing it with expedient

arguments. Incorporating substantive information improves and refines the assessment of the project's impacts and uses, giving the decision maker the soundest possible basis for his or her decision. Not including that commentary results in a deficient EIS that does not meet the intent or standards of NEPA.

I want to emphasize again that EPG's dismissal of public commentary is too sweeping, biased, and complete to fulfill NEPA's purpose for public engagement. Their approach is far too unbalanced. EPG personnel have too readily assumed that they already know what needs to be known, and the BLM itself has not objected to this or sought to correct it. I protest this violation of the public process in the strongest possible terms and ask that the BLM review and reconsider how EPG has managed its responsibilities.

Sincerely,

A handwritten signature in black ink that reads "Norm 'Mick' Meader". The signature is written in a cursive, slightly slanted style.

Norm "Mick" Meader  
Chair, Cascabel Working Group  
(520) 323-0092  
[nmeader@cox.net](mailto:nmeader@cox.net)

cc: Mr. Neil Kornze, Director, Bureau of Land Management  
Mr. Ray Suazo, Arizona State BLM Director  
Ms. Sally Jewell, Secretary, Department of the Interior  
Ms. Nancy Sutley, Chair, Council on Environmental Equality  
Mr. Jason Gerdes, Environmental Protection Agency, Region 9  
Mr. Mickey Siegel, Principal, Environmental Planning Group