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MEMORANDUM

To: Mr. Adrian Garcia, Project Manager, Bureau of Land Management, SunZia
Transmission Line Project, P.O. Box 27115, Santa Fe, New Mexico 87502-0115

From: Carol Lynn Erwin
Area Manager

Subject: SunZia Transmission Line Scoping Comments

We appreciate the opportunity to provide comments on the scoping phase of the SunZia Transmission Line Project Environmental Impact Statement even though the comment period ended on November 27, 2009. The Bureau of Reclamation recognizes and supports the need for renewable energy sources. However, we encourage the Southwest Area Transmission planning group to consider potential impacts to the unique ecological resources that occur within the vicinity of your proposed project. Reclamation has purchased several properties along the San Pedro River to mitigate our impacts associated with our projects. We have also constructed fish barriers on Aravaipa Creek and, in the fall of 2010, will construct a fish barrier in Hot Springs Canyon pursuant to Endangered Species Act Biological Opinions. We would like to ensure you are aware of these sites and express our concerns with respect to some of the proposed alignments.

San Pedro River Corridor

Reclamation has invested approximately \$6.8 million on the acquisition and/or protection and management of approximately 2,580 acres of land along the San Pedro River as mitigation for Central Arizona Project (CAP)-related impacts. These properties (listed below) are located (Figure 1) between Benson and Dudleyville along the San Pedro River in Arizona:

<u>NAME</u>	<u>LOCATION</u>	<u>OWNERSHIP</u>	<u>ACREAGE</u>
San Pedro River Preserve	Dudleyville	Conservation Easement	860
Cook's Lake	North of Mammoth	Fee Title	150

<u>NAME</u>	<u>LOCATION</u>	<u>OWNERSHIP</u>	<u>ACREAGE</u>
Spirit Hollow	South of San Manuel	Conservation Easement	100
Spirit Hollow Annex	South of San Manuel	Fee Title	50
3 Links Farm	North of Benson	Conservation Easement	1,420

The aforementioned properties are to be preserved and managed in perpetuity for the following purposes:

1. Protection of the federally endangered Southwestern Willow Flycatcher (*Empidonax traillii extimus*) as required by the 1996 Biological Opinion on the modified Roosevelt Dam; or,
2. Protection of riparian habitat as required by separate Clean Water Act, Section 404 permits.

The San Pedro River, one the largest undammed rivers remaining in the Southwest, supports high-quality riparian habitat with a large biodiversity of plants and animals. The San Pedro River is internationally renowned as a migratory corridor for neotropical birds. Portions of the lower San Pedro River are designated critical habitat for two federally listed species: endangered Southwestern Willow Flycatcher and threatened Spikedace (*Meda fulgida*). The lower San Pedro River supports one of the largest and most stable populations of Southwestern Willow Flycatchers range wide. In addition, the large expanses of riparian vegetation provide habitat for the Yellow-billed Cuckoo (*Coccyzus americanus*), a candidate species for Federal listing.

Since the late 1980s, The Nature Conservancy, Salt River Project, Pima County Regional Flood Control District, the Bureau of Land Management, and Reclamation have purchased (fee title) or placed conservation easements on property along the San Pedro River with the intent of providing long-term protection for the riparian resources along the lower San Pedro River. Installation of two 500 kV transmission lines (with up to a 1,000-foot-wide corridor) has the potential to negatively impact the diverse assemblage of biological resources these agencies/organizations have sought to protect.

Avra Valley Corridor

The proposed transmission line alignment through the Avra Valley would bisect the CAP Tucson Mitigation Corridor (TMC), a 2,514-acre preserve, that connects the Schuk Toak District of the Tohono O'odham Nation with Tucson Mountain Park (Figure 1). The TMC was established as a preserve for wildlife and plants and to serve as a wildlife corridor for large mammals between the Tucson Mountains to the east and the Roskrige Mountains to the west.

The agreement for management of the TMC between Reclamation and Pima County Natural Resources Parks and Recreation Department stipulates that future development within the TMC will be prohibited except for wildlife habitat improvements. Reclamation previously objected to use of the TMC for construction of a buried water pipeline, the Arizona Department of Transportation I-10 Bypass Alternative, as well as two high-profile proposals by the Department of Energy to utilize the TMC for an electrical transmission corridor.

Site-Specific Concerns

1. Construction and maintenance of access roads along the transmission line corridor.

We are concerned with both the direct and indirect effects associated with access road construction. A proliferation of access roads can fragment wildlife habitat placing additional stress on local wildlife populations. Access roads could become attractive nuisances, leading to increases in unauthorized roads which further degrade habitat values for wildlife.

2. Transmission tower footprints.

The San Pedro River has been recognized by many conservation organizations as having natural heritage values of global significance. The river supports cottonwood/willow riparian forests, several rare cienegas, sacaton grasslands, and the largest remaining mesquite bosque in Arizona. The size and placement of transmission towers can affect these unique habitats. Transmission lines should span the riparian zone avoiding impacts to the streambed and associated riparian vegetation. The transmission lines should also be of sufficient height to avoid clearing vegetation underneath the powerline.

3. Potential for the spread of invasive plants.

Removal of the existing ground cover can increase the potential spread of invasive plants. Linear features, such as utility corridors, can facilitate the spread of invasive plants over long distances. This impact can be minimized through prompt revegetation of the disturbed areas with native species.

Conclusions

The San Pedro River provides one of the best examples of an intact functioning ecosystem in the desert southwest. We believe that upon consideration of the potential impacts to the existing biological and hydrological resources, alternatives that closely parallel the San Pedro River should be eliminated. Alternatives that propose crossing the San Pedro River should be confined within existing utility rights-of-way.

In addition, the Avra Valley Corridor should also be removed from consideration due to the fact that the existing management plan precludes use of the TMC for any activity that impacts the viability of this site as a wildlife corridor.

We appreciate the opportunity to provide these comments. Should you have any questions regarding this matter, please contact Mr. Bruce Ellis, Chief, Environmental Resource Management Division, at 623-773-6250.

cc: Mr. Steve Spangle, Field Supervisor, Arizona Ecological Services Field Office,
U.S. Fish and Wildlife Service, 2321 West Royal Palm Road, Phoenix, Arizona 85021
Mr. David V. Modeer, General Manager, Central Arizona Water
Conservation District, P.O. Box 43020, Phoenix, Arizona 85080-2333
Mr. Larry D. Voyles, Director, Arizona Game and Fish Department,
5000 West Carefree Highway, Phoenix, Arizona 85086-5000
Mr. Rafael Payan, Director, Pima County Natural Resources, Parks and Recreation,
3500 West River Road, Tucson, Arizona 85741
Mr. Patrick Graham, State Director, The Nature Conservancy, The Plaza at Squaw Peak III,
7600 North 15th Street, Suite 100, Phoenix, Arizona 85020-4330
Ms. Ruth Valencia, Salt River Project, Mail Station PAB352, P.O. Box 52025,
Phoenix, Arizona 85072
Mr. Daniel Baker, Cascabel Hermitage Association, 6640 North Canyon Road,
Benson, Arizona 85602

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