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VIA ELECTRONIC SUBMISSION ([adrian\\_garcia@nm.blm.gov](mailto:adrian_garcia@nm.blm.gov);  
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Mr. Adrian Garcia, BLM Project Manager  
SunZia Southwest Transmission Project  
Bureau of Land Management  
New Mexico State Office  
P.O. Box 27115  
Santa Fe, NM 87502-0115

**Re: Recommendations for the SunZia Southwest Transmission Project**

Dear Mr. Garcia:

The Center for Desert Archaeology (CDA) and the National Trust for Historic Preservation (National Trust) write to express our concerns and recommendations regarding the Bureau of Land Management's (BLM) intent to prepare an environmental impact statement (EIS) for SunZia Transmission, LLC's proposal to construct, operate, and maintain a 460-mile transmission line with two 500 kV lines across southern New Mexico and Arizona. While CDA and the National Trust support the generation and transmission of renewable energy, BLM must provide thoughtful evaluation of the siting of such transmission facilities pursuant to the requirements of both the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). In fact, meaningful consideration of the potential direct, indirect, and cumulative impacts on historic and cultural resources and alternatives to avoid those impacts seems especially important for this proposal because BLM has already acknowledged that the project has the potential to affect "...visual resources, National Historic Trails and related viewsheds; Native American traditional cultural properties and sacred places." 74 Fed. Reg. 25,764 (May 29, 2009). More generally, our organizations are concerned about the lack of an overarching, coordinated plan for transmission development in the Southwest, and about potential adverse effects to historic trails and unparalleled landscapes of human history located within the proposed project area.

As a preliminary matter, CDA and the National Trust strongly urge BLM to initiate the Section 106 process immediately because the proposed SunZia project has the potential to adversely affect historic properties. See 36 C.F.R. § 800.1(c). Thorough and timely consultation with Native American tribes, state historic preservation officers (SHPOs), historic trail managers and non-governmental friends organizations,

local communities and other interested parties must be a central component of the Section 106 process. Although BLM may coordinate the requirements of Section 106 with the NEPA process, *id.* § 800.8, the agency must provide advance notice to the Advisory Council on Historic Preservation (ACHP) and the SHPOs and meet explicit standards for coordination, which are spelled out in the Section 106 regulations, *id.* § 800.8(c)(1)(i)-(v). CDA and the National Trust respectfully request to participate as consulting parties in the Section 106 process pursuant to *id.* §§ 800.2(c)(5), 800.3(f).

Please include Rebecca Schwendler, Andy Laurenzi, Ti Hays, Brian Turner and Leah Brown in your distribution list for public notices of any meetings, and for the circulation of any documents for comment. All correspondence should be sent to:

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### **Interests of CDA and the National Trust**

The Center for Desert Archaeology (CDA) is a non-profit organization based in Tucson, Arizona, dedicated to preserving the places of our shared past. Our geographic focus is the American Southwest and Mexican Northwest and we have more than a thousand members in the U.S. and internationally. We are also a Local Partner of the National Trust.

The National Trust for Historic Preservation (National Trust) is a private charitable, educational, non-profit corporation chartered by Congress in 1949 to protect and defend America's historic resources, to further the historic preservation policy of the United States, and to facilitate public participation in the preservation of our nation's heritage. See 16 U.S.C. §§ 461, 468. With the strong support of 235,000 members nationwide, the National Trust works to bring people together to protect, enhance and enjoy the places that matter to them. By saving the places where great moments from history – and the important moments of everyday life – took place, the National Trust for Historic Preservation helps revitalize neighborhoods and communities, spark economic development, promote environmental sustainability and protect public lands. The National Trust, which is headquartered in Washington, D.C., has nine regional and field offices, 29 historic sites and partner organizations in all 50 states.

1. **Clearly Define the Purpose and Need for the Proposal and Provide for a Reasonable Range of Alternatives**

CDA and the National Trust strongly support the development of renewable energy and its efficient delivery to end users. However, we are concerned that the SunZia proposal has been developed in the absence of a defined comprehensive plan for integrating renewable energy in the Southwest. It seems that such a comprehensive plan would help to not only define the purpose and need for the proposed project, but also to establish directions for future renewable energy projects, as well as projects that employ traditional forms of energy generation and transmission. Furthermore, the development of renewable generation and transmission can, and should, utilize to the greatest extent possible existing transmission corridors and facilities before considering new corridors, which could potentially further impact sensitive resources. Such consideration would ensure that a wide range of alternatives are identified and evaluated in the context of both NEPA and NHPA. A comprehensive renewable energy development plan also would assist in identifying opportunities to co-locate transmission facilities and, thus, eliminate the need for new rights-of-way. These efforts would support NEPA alternatives that minimize impacts to significant natural, historic and cultural resources.

2. **Adequately Identify the Historic and Cultural Resources Potentially Impacted by the Proposed Project and Evaluate the Project's Direct, Indirect and Cumulative Impacts**

Pursuant to NEPA and NHPA, BLM must seek to identify significant historic and cultural resources within the area proposed for the SunZia project. Adequate identification of these resources is critical for evaluating the project's potential direct, indirect and cumulative impacts. In turn, this evaluation will help to direct BLM to choose or propose additional alternatives that best avoid and mitigate adverse effects to historic and cultural resources. CDA and the National Trust want to emphasize that impacts come not simply from physical construction, but rather also

can stem from the creation of new vehicular access routes that could increase the likelihood of looting and vandalism of many archaeological sites and inappropriate and destructive use of Native American sacred sites.

Below are descriptions of some of the specific resources and resource areas that BLM should carefully consider when identifying and evaluating the potential impacts associated with the proposed project:

### **Archaeological Sites in Arizona**

Many prehistoric and historic cultural resources are located along the path of and in close proximity to the proposed 1000-foot primary transmission line right-of-way and alternative rights-of-way. Direct impacts to these resources, such as from ground disturbing construction activities, should be evaluated in the EIS. Indirect impacts to resources are of equal concern and also require evaluation. They include erosion and/or increased sedimentation resulting from construction activities, as well as artifact collecting and vandalism resulting from increased public access. Below we describe some specific locations that contain significant and sensitive cultural resources that should be thoroughly considered in the SunZia project EIS.

The most sensitive locations for cultural resources within the proposed project area in Arizona occur in the foothills of the Pinaleno Mountains, upper Aravaipa Creek, the lower San Pedro River valley and the Picacho Mountains—all of which are crossed by proposed or alternate routes. This fact again highlights the importance of considering using existing transmission corridors to meet additional demand.

First, the segment of the proposed route from the future Willow substation to the existing 500kV line in eastern Pinal County that traverses the Safford Basin, Aravaipa Valley and lower San Pedro Valley is of particular concern. The San Pedro and Aravaipa drainages contain near-complete records of 12,000 years of past human activity, including both Native American and Euro-American. This scale of regional preservation provides an opportunity to interpret sites as part of a broad cultural and economic landscape rather than as isolated phenomena. The great time depth allows us to study changes in this human landscape over the full time span during which people have inhabited the New World. Such opportunities are no longer available in many Arizona valleys (e.g., Phoenix, Tucson, Safford) where agricultural and, subsequently, urban development destroyed much of the archaeological record before adequate documentation could take place.

Considering the non-renewable character of cultural resources, CDA has worked diligently over the last 27 years to help preserve this important cultural landscape for current and future stakeholders, including Native American groups, archaeologists, local residents and the interested public. While doing so, CDA and other researchers have identified over 500 archaeological sites in the lower San Pedro Valley. About one third of these sites contain architecture and probably human remains.

Furthermore, at least 40 sites were villages inhabited by 100 to 250 people for a century or more and they are marked today by rich archaeological deposits that include thousands of ancient houses and scores of public structures such as ballcourts and platform mounds, as well as large burial areas. To date, a great deal of effort and money have been invested in preserving the cultural resources in this valley, such as through land acquisitions and the establishment of conservation easements by multiple agencies and institutions. The lower San Pedro valley also has received considerable attention from many conservation interests over the last 20 years due to the significance of the riparian and aquatic habitats and the pristine nature of the landscape. These natural riches have great time depth and help account for the equally rich cultural landscape of the San Pedro Valley.

When evaluating options for energy transmission, the potential for causing adverse effects to this last intact landscape in Arizona requires serious consideration. Every effort should be made to utilize the existing 345kV corridor through the area before considering a new corridor that would further impact this region. The preferred and alternative routes deviate from the existing 345kV line without adequate justification. As we state previously, use of the existing corridor would greatly minimize, if not completely avoid, impacts to cultural resources, particularly in the lower San Pedro River valley. Furthermore, the location and manner in which routes cross the river are especially critical for minimizing impacts to cultural resources. Crossings designed to avoid any ground disturbance within the riparian corridor of the river will facilitate protection of prehistoric cultural resources that typically are found within a mile-wide corridor centered on the river. CDA's intensive research into cultural resources along the lower San Pedro River has yielded excellent spatial data on the locations, condition and significance of archaeological sites there. CDA respectfully offers to use this data to assist BLM in identifying corridor crossings that have the lowest potential for disruption of prehistoric sites in the lower San Pedro River valley.

Second, the proposed and alternative routes that traverse the foothills of the Pinaleno Mountains have the potential to impact important but relatively understudied prehistoric sites associated with the Hohokam, Mogollon and Mimbres cultures. While many of the prehistoric sites located in the foothills of the Pinalenos and along the Gila and San Simon Rivers have been seriously vandalized, they still retain evidence that is vital for understanding the migrations of ancestral Puebloan people into southern Arizona. Potential impacts to these sources of indispensable information require careful consideration. Anna Neuzil's research in the Safford Basin<sup>1</sup> is the most comprehensive treatment of the prehistory of the area so we recommend mining her publication for more details about the importance of the area's cultural resources for understanding Arizona prehistory. In addition to the research value of these prehistoric sites, Hopi and Zuni people claim ancestral ties to the area and have noted that the habitation sites, petroglyphs and agricultural fields are significant to them.

<sup>1</sup>Neuzil, Anna A. 2008 *In the Aftermath of Migration - Renegotiating Ancient Identity in Southeastern Arizona. Anthropological Papers No. 73*, University of Arizona Press, Tucson. Third, several alternative routes are depicted in the vicinity of the Picacho Mountains. This area has been subject to a number of investigations over the years that have documented a rich heritage of Archaic, Hohokam and Historic period archaeological sites and rock art localities. Most notable are the Classic period Hohokam archaeological complexes associated with platform mounds at Brady Wash, McClelland Wash (a National Register of Historic Places [NRHP]-listed Archaeological District) and the Tom Mix Mound area. The McClelland District site is especially noteworthy, given its extensive area of Classic period habitation and its proximity to several nearby pre-Classic villages and agricultural and resource procurement areas. This archaeological complex is located immediately north of the CAP aqueduct and appears to be located within the proposed alternative right-of-way. Rock art panels with overlapping Archaic and Hohokam elements, identified by the Arizona SHPO as eligible for the NRHP, also are present in the Picacho Mountains and surrounding areas.

### **Historic Trails in New Mexico and Arizona**

At least six historic trails—not all of which are shown on SunZia’s project maps—may be directly or indirectly adversely affected by the SunZia transmission project: the Camino Real de Tierra Adentro National Historic Trail and the Janos Copper Road in New Mexico; the Juan Bautista de Anza National Historic Trail in Arizona; and the Mormon Battalion Trail/Cook’s Wagon Road, the Butterfield Trail and the Gila Trail in both states. In the EIS, BLM should identify any “high potential route segments” and “high potential historic sites” that are located within the project area, and should develop alternatives to the proposed action that place the transmission lines preferably within existing transmission corridors or, alternatively, as far from the trails as possible to avoid or minimize visual impacts to trail viewsheds.

For example, proposed alternate SunZia transmission routes are shown to cross El Camino Real de Tierra Adentro in New Mexico in four separate places. While each crossing appears to occur in the same location as an existing transmission line, there may be cumulative effects on trail viewsheds from the multiple transmission lines. The effects of building additional new roads, such as increased construction traffic and public access to the trail and associated cultural resources, must also be taken into account during the evaluation of project alternatives.

The primary SunZia transmission line is proposed to cross a new section of the Butterfield historic trail less than 20 miles east of Lordsburg, New Mexico. Because no transmission line currently exists there, the trail and any other cultural resources around that location should be carefully evaluated for potential adverse physical and visual impacts. In that location, burying the transmission line may be appropriate as long as mechanical excavation does not disturb subsurface archaeological deposits.

## **Landscapes of Significance to Native American Groups**

An evaluation of potential physical, visual and social/psychological impacts to Native American traditional cultural properties (TCPs) and sacred landscapes also must be included in the EIS. Early and thorough consultation with Native American groups that may have connections to lands within and adjacent to the transmission line corridors is extremely important. Because TCPs and sacred landscapes are highly susceptible to visual impacts, such as from above-ground transmission lines, and because mitigating such impacts is very difficult, BLM should attempt to resolve tribal concerns by avoiding TCPs and sacred landscapes all together.

For example, the preferred route running west from the Safford area could significantly impact a landscape of significance to Native American groups. The route is proposed to run directly between two (Mount Turnbull/Santa Teresa Mountains and Mount Graham/Pinaleno Mountains) of the four mountains that are sacred to members of both the San Carlos and White Mountain Apache Tribes. In addition, modern-day Akimel O'odham, Tohono O'odham, Hopi and Zuni peoples consider themselves descendants of the Hohokam and Ancestral Puebloan peoples who inhabited the lower San Pedro, Pinaleno foothills and Safford Basin. Therefore, these modern groups view landscapes containing prehistoric Hohokam and Ancestral Puebloan archaeological sites as significant to their histories and cultures. Accordingly, the U.S. Forest Service has determined Mount Graham eligible for listing on the National Register of Historic Places as a traditional cultural property. CDA also can provide BLM with supplemental information about the relationship between the archaeological record of southern Arizona and the oral traditions of these tribes.

### **3. Seek to Identify Adequate Measures to Mitigate Impacts to Historic and Cultural Resources**

In the EIS, BLM should identify adequate measures to mitigate potential adverse impacts to historic and cultural resources. Such measures should include creative ways to resolve difficult impacts associated with the visual intrusion and disruption caused by high voltage powerlines and facilities. Measures could include, for example, burying lines and/or co-locating lines. Identifying effective mitigation measures will be a critical step in satisfying both NEPA and NHPA.

## **Conclusion**

BLM must prioritize protection of the area's outstanding historic and cultural resources, including significant concentrations of prehistoric and historic archaeological sites, historic trails and Native American traditional cultural properties and sacred landscapes. Accordingly, BLM should insist on thorough documentation of cultural resources within the proposed project's area of potential effect through consultation with tribes, SHPOs, local communities and other interested parties and through archaeological and historical surveys. Then, BLM should consult with the

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above parties to develop measures to avoid adverse effects of the transmission lines on significant historic and cultural resources. If impacts are unavoidable, BLM should develop strategies to minimize and mitigate impacts.

Please include CDA and the National Trust on all announcements, as well as all notifications associated with the Section 106 process. We appreciate the opportunity to provide these comments and we look forward to participating further in this process.

Sincerely,

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