



June 25, 2012

Sent via Electronic Mail to:  
Bureau of Land Management  
C/O Adrian Garcia, BLM Project Manager,  
[NMSunZiaProject@blm.gov](mailto:NMSunZiaProject@blm.gov)

Sent via U.S. Mail to:  
SunZia Southwest Transmission Project  
C/O EPG, Inc.  
4141 North 32nd Street, Suite 102  
Phoenix, AZ 85018

**Re: SunZia Southwest Transmission Project's ("SunZia") Second Comment Letter on the SunZia Draft Environmental Impact Statement ("DEIS") issued on May 25, 2012, regarding Route Group 3.**

Dear Mr. Garcia:

On June 13, 2012, SunZia submitted its first comment letter, in which it explained why it believes that in the Final EIS Subroute 4B should be selected as the preferred alternative in Route Group 4, as it has fewer environmental impacts than does Subroute 4C2c, which was identified as the BLM's Preferred Alternative in Route Group 4 in the DEIS. The purpose of this second comment letter is to outline SunZia's concerns associated with the BLM's Preferred Alternative in Route Group 3, **Subroute 3A**. SunZia believes Subroute 3A is a more environmentally sound selection compared to Subroute 3A1, as it presents fewer environmental impacts and is a shorter, more efficient subroute .<sup>1</sup>

The SunZia DEIS states that the BLM Preferred Alternative was selected to:

- *"minimize impacts to sensitive resources*
- *minimize impacts at river crossings*

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<sup>1</sup> It is important to note that this second comment is being offered solely for the purpose of explaining why SunZia believes that the SunZia DEIS ultimately supports the selection of Subroute 3A instead of Subroute 3A1 as the BLM Preferred Alternative. SunZia anticipates sending additional comment(s) during the 90-day review period covering other substantive issues.

- *minimize impacts to residential and commercial uses, and*
- *minimize impacts to military operations within the restricted airspace north of the WSMR”*

[See SunZia DEIS at § 2.5.4.].

SunZia believes Subroute 3A better meets the BLM’s criteria for selection of the preferred alternative outlined at SunZia DEIS at § 2.5.4 because such a selection would minimize impacts to sensitive resources, including water.

Summarily, in light of SunZia’s first and second comment letters, SunZia recommends the BLM select as the Preferred Alternative in the Final EIS the following subroutes: Subroute 4B in the place of Subroute 4C2c in Route Group 4 and Subroute 3A instead of 3A1 in Route Group 3. This configuration would present fewer environmental impacts, especially with respect to impacts on water resources, than would the BLM’s currently selected subroutes comprising its Preferred Alternative in the DEIS.

**I. The BLM should select Subroute 3A as the Preferred Alternative in Route Group 3, as it has fewer environmental impacts than the BLM Preferred Alternative identified in the DEIS, Subroute 3A1.**

SunZia provides the following rationale to outline why it continues to believe that Subroute 3A presents fewer potential impacts to the environment and thus is more acceptable than Subroute 3A1. First of all, Subroute 3A1 is 140.3 miles long, while Subroute 3A is 123.4 miles long. This means that Subroute 3A1 has 16.9 more miles of impacts on the environment than Subroute 3A. Moreover, Subroute 3A1’s increased length likely requires additional ancillary facilities, such as roads for construction and maintenance, transmission structures, concrete batch plants, etc., than Subroute 3A, and would thus have a larger amount of ground-disturbing activities than Subroute 3A. For example, Subroute 3A1 has 134 more acres of temporary ground disturbance and 129 more acres of permanent ground disturbance than Subroute 3A. See SunZia DEIS at Appendix H. Accordingly, the selection of Subroute 3A1 presents a significant increase in project cost, approximately \$2.7 million dollars more per mile, than Subroute 3A.

Appendix H to the DEIS further illustrates the increased footprint, and thus larger total area of impacts, associated with Subroute 3A1. In many instances the impacts from Subroute 3A and 3A1 would be similar, save for the fact that Subroute 3A1 is nearly 14% larger and thus generally has at least 14% more area of impacts on a particular resource. Additionally, Subroute 3A1 has more mileage of greater impacts than Subroute 3A with respect to Water Resources, Biological Resources (including Vegetation, and Threatened and Endangered Species with respect to the Lordsburg Playa), and Sensitive Viewers. See SunZia DEIS at Appendix H.

Specifically, below is a listing of impacts from Subroute 3A1, the BLM's Preferred Alternative in Route Group 3, which are either greater than, or are not associated with Subroute 3A:

- Subroute 3A1 would cross the Lordsburg Playa and impact sensitive plants and invertebrates, whereas Subroute 3A would avoid the Lordsburg Playa. *See* SunZia DEIS at Appendix H and § 4.6.5.
- Subroute 3A1 would have more impacts to water resources than Subroute 3A. *See* SunZia DEIS at Appendix H.
  - Subroute 3A1 would cross more mileage of perennial rivers, intermittent streams, and would cross more wells and water bodies than Subroute 3A. *See* SunZia DEIS at § 4.5.3.
  - “Subroute 3A1 has the highest mileage of residual impacts to water resources within Route Group 3. . .” *Id.*
- Subroute 3A1 has potential to impact a greater amount of known cultural resources. *See* SunZia DEIS at § 2.5.
- Subroute 3A1 has higher impacts to visual resources, and Subroute 3A is in compliance with the BLM's visual resource management objectives whereas Subroute 3A1 is not. *See* SunZia DEIS at § 2.5, § 4.9.3, and Appendix H.
  - Subroute 3A1 could have visual impacts in the San Simon area, whereas Subroute 3A would avoid residences associated with San Simon. *See* SunZia DEIS at § 2.5.
  - Subroute 3A1 would have higher visual resource impacts to wilderness characteristics of the Peloncillo Wilderness. *Id.*
- Subroute 3A1 has higher impacts to existing land uses. “Subroute 3A would cross 0.3 mile of BLM right-of-way avoidance area, Subroute 3A1 would cross 1.3 miles of BLM right-of-way avoidance areas in two locations. . .” *See* SunZia DEIS at § 2.5. Consequently, Subroute 3A1 is more inconsistent with existing resource management plans in the area.

Based on information found in the DEIS, as outlined above, Subroute 3A1 results in more severe impacts than Subroute 3A. The one unique component of affected environment for Subroute 3A is that it is aligned near the Hot Well Dunes Recreation Area – SRMA/Campground. *See* SunZia DEIS at § 4.10.5. Specifically, Subroute 3A could allow unauthorized use of the recreation area by facilitating access where none previously existed. *Id.* However, impacts to the Hot Well Dunes Recreation Area – SRMA/Campground could be

effectively mitigated, as outlined in the DEIS. Summarily, to address public access-related issues, impacts from road construction would be mitigated through measures developed and outlined in the Construction, Operations and Maintenance Plan, including compliance with federal, state, and local rules and regulations regarding construction activities, noxious weed management, and fugitive dust control. Such mitigation measures would allow the impacts of Subroute 3A to be more effectively mitigated than the impacts of Subroute 3A1, especially with respect to impacts on water resources and the Lordsburg Playa.

As justification for selecting Subroute 3A1, the DEIS focuses on the fact that it is in alignment with a pipeline, and thus is “*collocated*” with “*existing*” infrastructure for a larger percentage of the route than Subroute 3A. However, following an underground pipeline does not provide much advantage, as additional ground disturbance would occur above ground and in a new right-of-way without the benefit of traditional collocated facilities, such as existing transmission lines. Consequently, this is not a strong justification, especially in light of the otherwise avoidable increase in impacts to water resources and the Lordsburg Playa.

Summarily, in considering the greater amount of environmental impacts associated with the BLM’s Preferred Alternative of 3A1 coupled with its increased length and cost, on balance, should render Subroute 3A1 less desirable than Subroute 3A.

## **II. Summary and Recommendation**

SunZia recommends that the BLM select Subroute 3A as its Preferred Alternative in Route Group 3.

### **Subroute 3A is a superior alternative route because it:**

- Avoids impacts to the Lordsburg Playa
- Avoids additional impacts to water resources
- Has fewer impacts to visual resources
- Has potential to impact fewer known cultural resources
- Has impacts that are more effectively mitigated
- Has substantially less mileage, cost, and environmental impact
- Results in fewer acres of temporary and permanent ground disturbance

After you have had a chance to review and consider this letter, I would welcome an opportunity to discuss its recommendation. If you have any questions or suggestions, please do not hesitate to contact me.

Sincerely,



Tom Wray  
Project Manager  
SunZia Southwest Transmission Project