



July 30, 2012

Sent via Electronic Mail to:
Bureau of Land Management
C/O Adrian Garcia, BLM Project Manager,
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 Third Comment on the SunZia Draft EIS, regarding SunZia's Suggested Alternative.

Dear Mr. Garcia:

The SunZia Southwest Transmission Project ("SunZia" or the "Project") submitted its first and second comments, on June 13 and 25 respectively. These comments explained why SunZia believes that in the Final EIS Subroutes 3A and 4B should be selected as the Preferred Alternative in Route Groups 3 & 4. The purpose of this third comment is to identify SunZia's concerns associated with a portion of the BLM's Preferred Alternative in Route Group 1, Subroute 1A1. For the reasons outlined herein, SunZia believes that a better, more technically feasible Preferred Alternative would utilize a majority of Route 1A1, but in lieu of Segment A260 would use Segment A270 to avoid two additional and otherwise unnecessary crossings of I-25.¹

Additionally, this third comment provides a summary of SunZia's "Suggested Alternative" that it believes should be designated as the BLM's Preferred Alternative in the Final EIS. The Suggested Alternative is comprised of a modified version of Subroute 1A1 that replaces Segment A260 with Segment A270, Subroute 3A and Subroute 4B. SunZia believes that its Suggested Alternative better meets the BLM's criteria for selection of the Preferred

¹ It is important to note that this third comment is being offered only for the purpose of explaining why SunZia believes the SunZia Draft EIS ultimately supports the selection of Segment A270 instead of Segment A260 in the context of Subroute 1A1, and providing summary of why SunZia believes its Suggested Alternative is superior to the BLM's Preferred Alternative in the Draft EIS. SunZia may send additional comment(s) during the 90-day review period covering other substantive issues.

Alternative as outlined in the SunZia Draft EIS at § 2.5.4, because such a selection would minimize impacts to sensitive resources, disturb less acreage, and is technically more feasible.

I. Subroute 1A1 should be modified by replacing Segment A260 with A270, as such an adjustment would make Subroute 1A1 technically more feasible.

With respect to Subroute 1A1, SunZia, by and large, supports the selection of the same, with the exception of Segment A260. Segment A260 unnecessarily requires two additional crossings of I-25, within approximately 20 miles of one another, resulting in three crossings of I-25. Alternatively, utilization of Segment A270 in lieu of Segment A260 and would require one crossing of I-25. Segment A270 would require two less encroachment permits from the New Mexico Department of Transportation (“NM DOT”) and would reduce the crossings of the I-25 access control area to a single crossing north of Socorro, New Mexico.

Based upon the experience of those working on behalf of SunZia, it is strongly believed that the NM DOT would be reticent to approve three encroachment permits for a single project within an approximate 65-mile span of interstate, as would be required for Subroute 1A1 to be feasible with the use of Segment A260. Alternatively, it is strongly believed NM DOT would be much more amenable and thus likely to approve one encroachment permit, as contemplated by the use of Segment A270 in the context of Subroute 1A1. Therefore, based on concerns related to the ability to permit Segment A260, the use of Segment A270 in the place of Segment A260 likely makes Subroute 1A1 technically more feasible. Accordingly, SunZia believes that the Final EIS should identify a Preferred Alternative that utilizes a modified version of Subroute 1A1, *whereby Segment A260 is replaced by the utilization of Segment A270.*

II. The Suggested Alternative is environmentally superior to the BLM’s Preferred Alternative in the Draft EIS, and should thus be considered for selection as the BLM’s Preferred Alternative in the Final EIS.

The Applicant has already submitted substantive comments on the BLM’s selection of Subroutes 3A1 and 4C2c as part of the Preferred Alternative in the Draft EIS. This comment provides a summary of why the Suggested Alternative is an overall superior alternative to the BLM’s Preferred Alternative in the Draft EIS.

First of all, the Preferred Alternative is 48.7 miles, or about 10% longer than the Suggested Alternative. Using information found in the Draft EIS, this increased length means that the Preferred Alternative would require over 300 additional structures, at least one more concrete batching plant, and at least one more fiber optic regeneration station, than does the Suggested Alternative. Consequently, we estimate that the Preferred Alternative could increase the Project’s cost by over a \$100 million.

Secondly, in addition to this avoidable cost increase, the Preferred Alternative causes a significant increase in environmental impacts in the form of ground disturbance when compared to the Suggested Alternative. The Preferred Alternative would lead to at least 357 more acres of

temporary ground disturbance and 219 more acres of permanent ground disturbance than the Suggested Alternative. While there can be a good basis to add length to a project, such as avoiding an impact to a particularly sensitive resource, no such justification is provided in the Draft EIS supporting this increased length.

Rather, the primary justification provided in the Draft EIS for the selection of Preferred Alternative is that it utilizes a route with the most potential to collocate the transmission line with existing infrastructure. However, upon further review of the Draft EIS Appendix H, the Preferred Alternative qualitatively appears to have comparably severe environmental impacts or, as is the case with water resources, more severe environmental impacts than the Suggested Alternative. Consequently, the Preferred Alternative does not seem to offer any qualitative environmental advantages, and instead adds quantitative impacts, i.e. it has a greater amount of mileage and acreage of impacts to resources because it is longer. Therefore, adding 10% to the length of the Project to provide for more collocation of infrastructure does not present an environmentally sound strategy compared to the Suggested Alternative, which by comparison to the Preferred Alternative, presents quantitatively fewer impacts for all resources and qualitatively less severe impacts to some resources, particularly water resources.

III. Summary and Recommendation

SunZia recommends that in the Final EIS, the BLM select a modified Subroute 1A1, in which Segment A270 is used in the place of Segment A260 as its Preferred Alternative in Route Group 1. Utilization of Segment A270 is superior because it avoids two additional crossing of I-25, and is thus likely more feasible.

In summary, SunZia also recommends that the BLM select the Suggested Alternative (consisting of Subroutes 1A1 utilizing Segment A270 in lieu of A260, and Subroutes 3A and 4B) as its Preferred Alternative in the Final EIS. The Suggested Alternative is a superior alternative because, among other things, it:

- Is more consistent with existing land-uses.
- Has fewer visual impacts.
- Has fewer impacts to sensitive biological resources.
- Has fewer impacts to known cultural resources.
- Has less severe impacts on water resources.
- Is more consistent with military missions of the Department of Defense.
- Is substantially less mileage, cost and ground disturbance.
- Better satisfies objections raised by the public and elected officials.

- Can be more effectively mitigated.

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