

## ***Tucson Electric Power Company***

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November 23, 2011

BLM, Phoenix District  
LS-SDNM RMP  
21605 N. 7th Ave.  
Phoenix, Arizona 85207

To whom it may concern:

**Subject: Comments for Lower Sonoran and Sonoran Desert National Monument Draft Resource Management Plan/Draft Environmental Impact Statement**

Tucson Electric Power provided comment previously on the Phoenix South Resource Management Plan and Sonoran Desert National Monument Resource Management Plan (March 21, 2003) and stands by those comments. TEP is providing comment at this time to reaffirm its position and comment on the Draft Resource Management Plan.

TEP is supportive of Alternatives A and B, as written.

Tucson Electric Power (TEP) has an existing 345kV transmission line and approval for a future parallel 345/500kV line through the Lower Sonoran Field Office and Sonoran Desert National Monument.

The existing line and planned future line are key interconnections for southeast Arizona to the regional electric grid. They play a critical role in bringing power from regional generation facilities to southeast Arizona. With the current focus on renewable energy and the associated BLM efforts to site renewable resources on federal lands, these transmission lines will play a significant role in the transfer of renewable energy.

TEP has reservations related to Alternatives C, D, and the Preferred Alternative E. These alternatives do not recognize TEP's existing 345kV line and approval for a future 345/500kV line as a utility corridor through the Sonoran Desert National Monument (SDNM). In order for TEP to support these alternatives, they would need to recognize TEP's existing land use authorizations and allow for their renewal. These are state regulated transmission lines, authorized through the Arizona Corporation Commission (Line Siting Case #15). In addition, TEP has maintained and paid for a valid land use authorization (Grant 7274) from BLM since July 1975.

TEP's facilities were authorized and constructed well before the SDNM was established, and only after a thorough environmental impact study and public process had been conducted. It is understood that the management objectives of the SDNM are to protect the biological, scientific, and historic resources and objects located within the monument, however these objectives cannot be met to the detriment of all else, including the availability and affordability of energy resources.

While the Draft RMP/EIS briefly discusses the socioeconomic and environmental impacts that would occur to adjacent lands and the costs that would be incurred by utilities and their ratepayers if Alternatives C, D, or E are implemented, it does not quantify these impacts, which would be significant.

In short, a utility corridor has already been created through what is now known as the Sonoran Desert National Monument. Considerable financial investment has been made and environmental impacts have been addressed. Recognizing TEP's transmission line easements as a utility corridor will minimize any future impacts to the very resources this plan is trying to protect.

Finally, TEP would like to make one clarifying comment:

The utility corridor illustrated and described between Ajo and Why is not associated with Tucson Electric Power.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Breslin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Shannon Breslin  
Manager, Land Management

Enclosure: Tucson Electric Power Comment Letter, dated March 21, 2003

cc: Ed Beck, Erik Bakken, Marc Jerden, Cheryl Hall, Cory Pintor, Clark Bryner

March 21, 2003

Karen Kelleher, Project Manager  
Phoenix South/SDNM Planning  
21605 N. 7<sup>th</sup> Ave.  
Phoenix, Arizona 85207

Dear Ms. Kelleher:

Subject: Comments for Phoenix South Resource Management Plan and  
Sonoran Desert National Monument Resource Management Plan

The following are scoping comments for Tucson Electric Power Company for both the Phoenix South and the Sonoran Desert National Monument Resource Management Plans

The existing and planned extra high voltage (EHV) electric transmission line system serving the Tucson area of Southern Arizona was generally put in place in the late 1960s, 1970s, and 1980s. The reliability brought by this EHV electric system is no accident. The planning and construction of these lines required many comprehensive studies that included local, state, and federal approvals. However, the ability of Tucson Electric Power (TEP) to continue to construct, operate, and maintain the existing and proposed electric facilities in the established right of ways of this system are potentially in jeopardy. Without consultation with electric utilities in general, and TEP in particular, segments of these necessary EHV facilities have been designated a part of the Sonoran Desert National Monument. The result has been the creation of potential restrictions to existing electric energy distribution and/or to plans for the Southern Arizona system enhancements that may cost hundreds of millions of dollars to change.

Attached is a chronology of local, state and federal actions from the late 1960s through 1980 relating to the development of the EHV electric system for Southern Arizona highlighting the TEP service area in particular. It is a complex system that is connected with, and interrelated to, the EHV grid of the Western United States. It is also responsive to the growing need for system interconnections across the Arizona-Mexico international border.

Consequently, any management plan components for the Sonoran Desert National Monument or Phoenix South that restricts the ability of TEP to construct, operate, and maintain these necessary electric facilities must also provide sufficient funds to develop acceptable alternatives for those restrictions.

This would also include monies necessary for all activities identified in the chronology of events that would lead to the adoption of a change to the EHV Electric system plan and

any necessary construction cost increases.

Specifically, we respectfully request that the Sonoran Desert Management Plan include a full identification of the social and economic impacts on all of the approved regional EHV electric system components located in Sections 4 and 12, Township 7 South, Range 2 East; Sections 7, 17, 18, 21, 22, 23, 25, and 26, Township 7 South, Range 3 East; and Sections 30, and 31, Township 7 South, Range 4 East. These locations are shown on attached Exhibit A.

Exhibit B shows the location of the corridor approved in 1980 (Case 50) by the State of Arizona Power Plant and Transmission Line Siting Committee and Arizona Corporation Commission (ACC), in Sections 15, 22, and 27 of Township 14 South, Range 10 East.

As you will see from our attachments, the existing transmission system components and the plans for future system enhancements paralleling those components were pre-approved well before the contemplation of the monument designation for the area (See ACC Case 15 and Case 50). TEP, therefore recommends that the final Phoenix South/SDNM Resource Management Plans include retention of both the existing system components and the plans for system enhancements that were previously approved by the United States Department of Interior (BLM) and the Arizona Corporation Commission.

More recently TEP has been working as a participant with the Central Arizona Transmission Study (CATS) Committee to coordinate plans for future EHV transmission lines. As an alternative to their Palo Verde to Saguaro 500 kV transmission line, TEP is considering a Pinal West to Saguaro 500 kV line. In addition TEP is also planning both Southeast Valley to Winchester and Saguaro to Winchester 500 kV transmission lines to meet future growth in Southern Arizona. Winchester Substation located in Section 28 Township 14 South, Range 21 East in northeast Cochise County, has been approved by the State of Arizona Power Plant and Transmission Line Siting Committee and is scheduled to be in service in the spring of 2004.

It is imperative that the Phoenix South Resource Management Plan also include these more recently planned lines as they are a necessary part of the future electric service to areas adjacent to the Phoenix South Project boundary. Thank you.

Sincerely,

Lee S. Aitken  
Director, Land Management & Requirements

cc: E. Beck, E. Bakken