



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Las Cruces District Office  
1800 Marquess Street  
Las Cruces, New Mexico 88005  
[www.blm.gov/nm](http://www.blm.gov/nm)



In Reply Refer To:

NMNM 124104  
2800 (L0310)

JUL 18 2012

CERTIFIED -- RETURN RECEIPT REQUESTED  
7005 1820 0003 3590 9723

Mr. Tom Wray  
Project Manager  
SunZia Southwest Transmission Project  
3610 N. 44<sup>th</sup> Street, Suite 250  
Phoenix, AZ 85018

Dear Mr. Wray:

The Las Cruces District Office has received your letter, dated June 1, 2012, regarding the SunZia Southwest Transmission Project's (SunZia Project) scoping comments and request for correction and clarification of information presented during the Southline Transmission Project (Southline Project) scoping process.

We appreciate your continued concern and the attention you have given to the proposed Southline Project. You requested that certain information pertaining to the SunZia Project, which is currently within the Southline Project's Administrative Record, be clarified. You also requested an extension of the scoping period in order to allow for consideration of any such information which could afford the opportunity for better informed and meaningful comments on the Southline Project. Furthermore, your letter indicates a belief that this incorrect information pertaining to the SunZia Project has created a misleading comparison of the two projects. Your letter suggests that these inaccurate representations have the potential to be harmful to the SunZia Project given the coincident timing of the Southline Project's scoping meetings to the release of the SunZia Draft Environmental Impact Statement (EIS).

The BLM stated in our presentation during the scoping meetings that, (1) both transmission line projects are independent projects that have filed Right-of-way applications with the BLM, (2) each project has individual purposes and needs and met separate and specific objectives identified by the proponents, and (3) the BLM was giving full consideration to both projects. The BLM does not have, nor was it the intent of BLM to convey any preference toward either project. However, we understand your concerns and have stopped using the slide in our discussions about the two respective projects.

The data/information for which you requested specific corrections and/or clarification are:

1. Two statements on Slide 15 of the BLM PowerPoint presentation from the Southline Scoping meetings:
  - a. Bidirectional use of power; and
  - b. Shorter and less costly.
2. Clarification regarding inconsistent information regarding transfer capacity (the size) of the Southline Project.
3. Clarification of the discrepancy in the transfer capacity between the new build and the upgrade segment of the Southline Project.
4. Clarification of the purpose of the interconnection with existing distribution substations affiliated with the upgrade segment of the Southline Project, and the associated distribution substation expansions.

Regarding Item 1, your statement that alternating current (AC) transmission lines are bidirectional because the power on an AC line is able to flow in both directions and that since SunZia has at least one AC line, it could be used in a bidirectional manner (power flowing either east to west or west to east) is accurate. The project description from the SunZia Administrative Draft EIS, which we used to create this slide, does not mention the bidirectional use of the power on the SunZia transmission line. We note that your SunZia Project website does indeed say it is a bidirectional power line. After our error was brought to our attention at the Las Cruces public scoping meeting, the BLM stated in subsequent scoping meetings that both transmission line projects could be used in a bidirectional manner. As aforementioned, we have removed this slide from the PowerPoint presentation on the Southline BLM website and we will include a clarification to our use of the term bidirectional in our next scheduled newsletter, which will be sent out following the close of the Southline scoping period.

The second point of Item 1 relates to our statement that Southline is shorter and less costly. You state that this is an “*apples-to-oranges*” comparison as the SunZia Project is longer because it is providing access to wind resources not accessible by Southline, and that the cost does not account for the different voltages and project capacities. It was not the BLM’s intent to make a comparison of construction costs per installed kilowatt. The BLM compared the two projects by utilizing Slide 16, which is a map of the two project study areas illustrating that the SunZia Project is a larger project creating infrastructure to access and facilitate wind resources in central New Mexico as compared to the Southline Project which is a shorter project creating infrastructure to access and facilitate the solar resources in southern New Mexico. Nonetheless, the BLM recognizes that some people may misconstrue the intent behind the comparison. The BLM will be treating this issue as a comment to be addressed in the EIS for the Southline project.

Regarding Item 2, you reference discrepancies between what was published in the Notice of Intent (NOI) to prepare the EIS versus what was presented in the scoping information materials regarding transfer capacity for the project. Specifically, the NOI indicated 1,500 MW of transfer capacity between Afton and Apache Substations, and up to 1,000 MW transfer capacity between

Apache and Saguaro Substations, while the project Plan of Development indicated initial capacity of 1,000 MW with ultimate 2,000 MW between Afton and Apache Substations, and initial capacity of 1,000 MW with ultimate capacity of 1,500 MW between Apache and Saguaro Substations. The BLM agrees that transfer capacity is an important factor to understand as it does affect the overall voltage level and size of the project and subsequent disturbance associated with the project. As you are no doubt aware, project details evolve over time for a project of this scope. The transfer capacity details changed between the time when the BLM drafted the NOI and when Southline filed a revision to their Plan of Development. This transfer capacity issue will be discussed and clarified in the Draft EIS.

Items 3 and 4 are related to the discrepancy in the transfer capacity between the new build segment and the upgrade segment, and the purpose of the interconnections with existing distribution substations affiliated with the upgrade segment of the project. These are both good observations and comments that will be considered and addressed in the Draft EIS.

You were previously notified that the scoping period for the Southline Project was extended until July 5, 2012. I hope you find this responsive to your questions and concerns. If you have any questions, please contact me at the above address, or by phone at (575) 525-4499.

Sincerely,



Bill Childress  
District Manager

cc:

Mark Wieringa, Western Area Power Administration  
Western Natural Resources Office - A7400  
P.O. Box 281213  
Lakewood, CO 80228-8213

WO (560, C. Wells)