

January 28, 2013

[REDACTED]
Sun Valley to Morgan Project, Attn: Joe Incardine/Kathleen Depina
BLM Phoenix District Office, Hassayampa Field Office
21605 North 7th Avenue, Phoenix, Arizona 85027-2929

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PHOENIX DISTRICT OFFICE
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RE: Comments on the Bureau of Land Management's Draft Environmental Impact Statement for the Proposed Arizona Public Service's Sun Valley to Morgan 500/230kV Transmission Line Project, and the BLM's Proposed Amendment to the Bradshaw - Harquahala Resources Management Plan.

My name is [REDACTED], a SRP Customer who is pro APS justice and pro APS Customers' justices in the SV-M matters before the BLM.

EIS processes are not new to me as have commented on 8 federal-agency projects over two decades including BLM's in the Arizona Strip, and around the Grand Canyon National Park plus the BLM/DOE Interstate Transmission Corridors Project.

Having relocated November 1976 to Harquahala Valley, Az. for business reasons, within 7-9 months latter agriculture and associated businesses, residents and others were confronted 1977 by the Palo Verde (Nuclear Generation Plant) to the (Southern California Edison's) Devers (Substation) I 500kV Transmission Line Project. Our valley group was pro PVNGS, understanding of SCE's transmission need, needed PV-D line route adjustment and received our request by the Arizona Power Plant and Transmission Line Committee which was finalized during 1978 by the Arizona Corporation Commission.

Although had to leave HV because of my oldest brother's medical circumstances, was not far away in Scottsdale, Az., the location of new employment, interests in state and federal projects were in mind as read about numerous matters over decades. Participant in EIS projects started in the 1990s and at hearings during the 2000s, was an individual intervener against PV-D II before both the APP&TLSC and the ACC and subsequently was a public commenter at two Siting Committee hearings for different solar-powered plants.

Claiming little regarding energy-producing related projects and EIS processes, am participating in SV-M because of Mr. Joe Incardine's influence and encouragement that will be detailed some later in this public comment.

DIGRESSING, AT THIS MOMENT I WOULD LIKE TO THANK THE BLM VERY MUCH FOR THE HARD-COPY VOLUMES MAILED ME ON THE SV-M DEIS AS AM AMONG THE NATION'S 30% WITHOUT A PC AT HOME.

ADDITIONALLY, THE BLM HAS PRODUCED THE TWO VOLUMES HIGHLY ACCURATELY, AND SHOULD HAVE DONE SO EASILY SINCE COMPLETING THEIR 10-YEAR RMP WORK.

However, for this SV-M project BLM's NOI process is very, very inferior considering the ACC SV-M decision including controversies regarding the NE 9-10 miles of proposed line-segment route on BLM-managed Public Lands and regarding the extremely, very large portion of Maricopa County's 4.500,000+ population being nonrecipients on associated

matters. All populations associated with federal projects, moreso than the entire U.S. Public population, are different sizes, and BLM's lack of recognitions in this case is just horrible. Using APS to advertise SV-M Public Scoping Meetings is a huge disgrace because they're agency announcements. BLM doing own work would have resulted justly/better for the Maricopa County Public.

The SV-M project has been known for years because of the growths in the urban county area. The APP&TLSC proceedings blindsided APS and their preferred/three-alternate routes were hijacked into a line route that included crossing 9-10 miles of BLM-managed Public Lands. The hijacking was the work of extremist politicians who are very active toward achieving their goals and not cooperating with Public goals.

For example, the same extremist politicians were able to place Proposition 120 on the November 2012 Arizona State General Election Ballot. BLM staffers at the N. 7th Ave. Office, Phoenix are local residents and Arizona Voters. They should recall Prop.120 well because if passed would have asserted "Arizona State sovereignty over U.S. Public Lands", ... exclusive authority and jurisdiction over air, waters, minerals, wildlife and other natural resources within Arizona's borders to gain complete control of the lands while undermining federal laws. Fortunately, Arizonans having forethoughts voted Prop.120 overwhelmingly down saving confusions, both local and federal employments.

These extremist politicians have been attacking everywhere over the last 5-6 years including state agencies like the ACC et al. Their first success was at the APP&TLSC, and subsequently at the ACC hearing on SV-M. Thus, the ACC forwarded to the BLM (so to speak) "a political routing" for SV-M. Now the "political portion of SV-M on BLM-managed Public Lands north of SR74" is an entrapment for the federal agency.

APS had objected to the ACC decision because they do not want to build a high-voltage line over a 10-lane wide freeway (foot-noted in the DEIS) that is a future replacement for SR74. Additionally, the ACC action has caused a construction delay of SV-M, and each delay causes construction costs' increases. Since the BLM had to complete the B-H RMP before accepting APS's forced application for an EIS, that additional delay also adds to increased APS construction costs.

Why did not BLM deny APS's EIS application, and send the politics back to the ACC? The 12/13/2013 Arizona Republic Newspaper edition, Pages B1/B3, revealed that BLM was pressured to do the EIS by "U.S. Rep. Trent Franks, a West Valley Republican" known for his ultra politics. Thus, APS has a 3rd delay causing construction costs to increase more.

Has the BLM "cracked" under the political extremism? The very poor BLM performance in the NOI process affirms they have. Can BLM right itself? The final EIS will inform.

During May 2011, I visited the BLM Office, 21605 N. 7th Ave., Phoenix on a different matter to which I received positive service. While still at the office's front counter, the BLM staffer asked me about SV-M and presenting scoping comments. Unsure and slow to respond, the staffer placed me in contact with Mr. Joe Incardine, who explained the

need for additional scoping comments June 8, 2011 at the BLM Training Center, Phoenix. Unable to attend one of the three scoping meetings during April because of business that same week, I had not updated myself on SV-M; sufficient research would be a problem. With Incardine's encouragement, I left the BLM office that day having agreed, and his follow-up email was received later May 2011.

About 35-40 individuals sat in the BLM-TC auditorium the evening of June 8, 2011 and placards with 18-20 speakers were in front of us. Each scoping presenter had five minutes to comment, and I do not recall names. Two were from the same Vistancia development 6 miles or more south of SR74; the lady was pro "the political SV-M route N. of 74", and the man against. An APS employee spoke as well as a rep of the Az. St. Land Dept. whose presentation was stated more than once that he nor his agency had been contacted by anybody on SV-M and the Trust Lands. The manager of the Lake Pleasant Regional Park spoke as well as a gentle man from the Sierra Club. After all the scoping had finished, with meeting time remaining the question went out for any person in the audience to speak. The last speaker provided his name (-?-) but no organization nor business came to the auditorium front deliberately before me stating there will be a freeway where SR74 is; his presentation appeared like a "threat" to me with "fixed eyes".

My scoping presentation regarded the 55+ years BLM and Maricopa County residents and government had, and LPRP became a reality and had continued to grow as county taxpayers/volunteers' efforts so that over 1.5-million users enjoyed it in 2010. I also stated SR74 was important to folks' experiences at the park, and also to surrounding and buffering BLM-managed Public Lands were westward for recreations and educations. In the SV-M DEIS, BLM fails to explain why in 2013 they used 2006 stats on LPRP users ?? That is deceptive and/or uninformed due to lack of BLM research for the DEIS!!

After receiving the DEIS two volumes via U.S. Mail, I was forwardly looking to reading the enclosed details et al when life's openings permitted. In Vol.1 a page is unnumbered and titled "Abstract". While reading the Abstract paragraphs, discouragement was felt because BLM had "the cart before the horses" - ? When can the reader of EIS options understand because BLM had not presented the entire two volumes yet? Whether read from hard copies or on a PC, does BLM expect anyone to read the entire DEIS after not providing the Public the DEIS details before the options?

The answer is "probably no!", but then a person reaches the Public Scoping Meetings Section and Table 1.7-1 on Page 1-17. The Scoping Meeting of June 8, 2011 is not included at all. We were at the BLM Training Center the eve of June 8, 2011 and folks made their 5-minute scoping comments, and departed at the end".

Arriving on P.1-18, the last paragraph reveals "on June 8, 2011, an Economic Strategies Workshop was also conducted". What??!! In Table 1.8-2 we find the words "would benefit developers"! That is BLM's bias or politics when they should be neutral!!

Last week I had a telephone conversation with the BLM's Ms. Kathleen Depukat who alleged the ESW was the same meeting as the scoping comments were. Really? In

review of Mr. Incardine's words to me, he stated the scoping individuals would be "invited", meaning the June 8, 2011 meeting was never announced to nor intended for the Public. Hiding events is dirty politics. At the "scoping meeting" ever presentation was oral. For an EWC, the duties are verbal, written and charted, and that combination did not occur as there were no "round tables" for small groups to strategize.

Was the June 8, 2011 "to set the Public participants up" for the benefit of developers and politicians? - BLM dirty-political trickery? I was able to contact folks of the June 8th meeting, and neither has an email for a economic strategies workshop that day. Thus the BLM has now taken the roles of the "extremist politicians" in these DEIS matters. Or the allegation by phone is a cover-up lie!

Also on P.1-18 is a scoping comments table with one-to-two words per category except for those "unclassifiable", AKA "nonsubstantive". The whole table is nonsubstantive because the DEIS commenter has no categories' statements nor details to read, and the commenter should not assume anything about what's in the table.

Let's talk about "scenes/visuals" (as a category). We should read specifics of Ss/Vs. We have none in DEIS Table 1.8-1. Are there public statements or questions about transmission towers? No!! Do scoping commenters know about different transmission structures? Is the high-voltage electric line an objection? Did any scoping commenter present the abilities of developers to minimize views with any thing objectionable associated with a SV-M line? Which commenters spoke or wrote about monopoles, and would that be from a "pro" or "anti" stance? APS plans to use monopoles in constructing SV-M, and diameters of such poles are far less blocking than the erector-towers with T-bars at the top; thus, viewing monopoles from distances is "more pleasing to the eyes". Who asked about the color of the monopoles? Where are the answers in the DEIS to public-scoping comments and/or concerns on Ss/Vs?

Additionally, the Phoenix metro has multitudes of varied high-voltage lines bringing electric energies to an enlarged community area and to neighborhoods. Folks have seen them for decades, and adjusted to them. In the DEIS where are BLM's reference locations of such that anyone could travel to for viewing/reviewing established electric lines? Civic duties have been handled by metro folks over years as the growth spread; are two developers and some friends of a developer selfishly uncivic toward SV-M?

Diamond Ventures, against APS's SV-M routes, successfully made a land-swap deal with the BLM a few years ago; the U.S. Public lost severely in the transaction. Now Diamond has the prime land and is complaining about SV-M affecting land values? Nonsense!!

Regarding SR74, some of the Public has read Maricopa County's Article 2201-F, the criteria establishing preservation of natural cultures and landscapes plus scenic qualities along the highway. Has BLM? That is substantive, but it is not in the DEIS!

Let's get to the DEIS options first listed on page "Abstract". The Proposed Action is the same "political route" from the ACC as the BLM does not have its own original route

for the SV-M segment north of SR74. The BLM has provided no guarantees on any of its political routes in the DEIS, including the "Alternate-1" SV-M routing. BLM is not complying with their mission "to manage and to protect Public Lands" by promoting the construction of a "politically" industrial project that is not in best interests of the Public!!

Further, neither "P.A." nor "Alt.-1" protect the LPRP and adjacent Public Lands that provide buffering to the west of the park's main entrance and buffering that's very necessary to help the "desert tortoises" live free and undisturbed for the most times with sufficient tortoise-family lands providing nutritions. The tortoises should be protected from future multi-event years SV-M maintenance disturbances. Desert tortoises have suffered tragedies of harassments to killings elsewhere, and are candidates to be protected, and the BLM-managed Public Lands north of 74 can be a refuge for additional tortoise families. Even transferring desert tortoises from developers' lands to a Public Lands' refuge N. of 74 is worthy of reality!! Back to Lake Pleasant Park, as the metro continues northward toward SR74, the population will grow and more land will be needed for an expanded park with BLM's management of our Public Lands as users and activities at LPRP both increase. BLM's DEIS has not addressed additional park concerns.

The "Alt.-1" route is even more scarier than all stated above regarding the "P.A." route. The "corridor" of 1/2-mile wide is the huge problem. Details what will be inside the corridor are not in the DEIS - ??

We have noticed that the Maricopa Association of Governments has been a working partner with BLM since the Public Scoping Meetings on SV-M. Since MAG decides freeways for our metro, freeway evidences should be in the DEIS and not just footnotes for a 10-lane wide freeway to replace SR74. The true width of a 10-lane wide freeway will include lanes for shoulders, medians, bridges' structures, ramps et al; thus the total width could be 22-24 lanes wide. Thus, "Alt.-1" should never have been an option in this APS application, DEIS, for a SV-M transmission line. Having MAG's freeway on Public Lands N. or 74 is horrible, BLM!! MAG has no application to the BLM for anything.

The DEIS's "Alternate-2" and "Alternate-3" options are less expensive than the "P.A." or the "Alt.-1" routes. "Alt.-2" and "Alt.-3" are not on lands managed by the BLM, but are already inside the metro-community's lands like all of APS's original SV-M routes to the APP&TLSC and to the ACC. In this tragic economy APS, who planned SV-M routes more cost-effective, and APS's electric-ratepaying Customers need the lowest-costing SV-M.

Does BLM understand how many families and individuals are still struggling in the present economy, and many, many will still struggle in the unknown-future economies?

The DEIS "No Action Alternate" should be amended to include a ROW across the BLM-managed lands near the Sun Valley Substation and to include a ROW across the "key-figured" BLM land just south of SR74 to assist the ACC and APS select a final routing for SV-M. If those two BLM parcels require any RMPs, please, amend for the Final DEIS also.

On behalf of the Public, I respectfully urge the BLM to set aside any biases and politics in these SV-M matters, and allow an amended "No Action Alt." be renamed and become

the Final EIS decision for the APS and for their electricity-paying Customers. BLM-managed Public Lands north of SR74 will remain undisturbed, and agency personnel can return to managing and to protecting the Bradshaw-Harquahala lands in the best Public interests.

Sincerely yours,

Copies: numerous