

From: [Meredith Griffin](#)
To: [Peggy Fry](#)
Subject: FW: Proposed Sun Valley to Morgan 500/230kV Transmission Line Project and Bradshaw-Harquahala Resource Management Plan Amendment, Maricopa County, Arizona
Date: Monday, February 11, 2013 9:41:12 AM
Attachments: [US Bureau of Land Management Letter 2-5-2013..pdf](#)

From: Incardine, Joseph [mailto:jincardi@blm.gov]
Sent: Friday, February 08, 2013 8:26 PM
To: Greg Brown; Schelle Davis; Ellen Carr; Meredith Griffin
Subject: Fwd: Proposed Sun Valley to Morgan 500/230kV Transmission Line Project and Bradshaw-Harquahala Resource Management Plan Amendment, Maricopa County, Arizona

----- Forwarded message -----

From: **Lynn Mattson** <lynn.mattson@sabalfin.com>
Date: Fri, Feb 8, 2013 at 4:39 PM
Subject: Proposed Sun Valley to Morgan 500/230kV Transmission Line Project and Bradshaw-Harquahala Resource Management Plan Amendment, Maricopa County, Arizona
To: "kdepukat@blm.gov" <kdepukat@blm.gov>, "jincardi@blm.gov" <jincardi@blm.gov>
Cc: Rick Brown <rick.brown@sabalfin.com>, Tim Connors <tim.connors@sabalfin.com>

Everyone

Please find attached the letter for: **Proposed Sun Valley to Morgan 500/230kV Transmission Line Project and Bradshaw-Harquahala Resource Management Plan Amendment, Maricopa County, Arizona**

Thank you,

Lynn Mattson

SABAL FINANCIAL GROUP, L.P.
4675 MACARTHUR COURT, SUITE 1550
NEWPORT BEACH, CA 92660
Direct: 949-517-0829
Fax: (888) 947-3232
lynn.mattson@sabalfin.com
WWW.SABALFIN.COM

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Joe Incardine
National Project Manager
Stationed in Salt Lake City
Off: 801-539-4118
Cell: 801-560-7135

February 5th 2013

Mr. Joe Incardine
U.S. Bureau of Land Management
Phoenix District Office,
Hassayampa Field Office
21605 North 7th Ave.,
Phoenix, Arizona, 85207-2929

Re: Proposed Sun Valley to Morgan 500/230kV Transmission Line Project and Bradshaw-Harquahala Resource Management Plan Amendment, Maricopa County, Arizona

Dear Mr. Incardine,

Lake Pleasant Heights appreciates the opportunity to submit our public comment on the Bureau of Land Management (BLM) Draft Environmental Impact Statement (DEIS) for the proposed Sun Valley to Morgan 500/230kV Transmission Line Project (Transmission Line) in Maricopa County, Arizona, and the Proposed Bradshaw-Harquahala Resource Management Plan Amendment (BRMPA). As a private land owner in Peoria, we appreciate the Arizona Corporation Commission (ACC) line siting efforts that certified the Proposed Action alignment in March of 2009. The ACC and the extensive Line Siting and Corporation Commission public process recognized the importance of avoiding planned developments on private land that had completed a public rezoning via a legislative process and had obtained government approvals.

The owners and developers of Peoria master-planned communities have continued each year to make significant investments to bring their projects to market. The Phoenix housing market is very active, home values are climbing, and the Peoria sub-market is highly desirable. In the foreseeable future, Lake Pleasant Heights and Saddleback Heights will join Vistancia and will become contiguous neighborhoods; connected by streets, parks, schools. We appreciate BLM's work analyzing impacts and concurring with the ACC decision to issue a Certificate of Environmental Compatibility for this transmission line. We support the approval of the Proposed Action as the Agency Preferred Alternative, and oppose Alternative 2, Alternative 3 and the Sub Alternative, which place the transmission line in closer proximity to existing and soon-to-be-built and occupied homes.

Lake Pleasant Heights is a specific area master planned development on approximately 3,268 acres located in Peoria, Arizona, which has been outlined in the City of Peoria General Plan. The Proposed action as the Agency Preferred Alternative is the only route consistent with local governmental plans including the City of Peoria, and is the expectation of the Federal Land Policy and Management Act (FLPMA) such that land use plans of the BLM "... Shall be consistent with State and local plans to the maximum extent"¹

In several instances, the DEIS characterizes Alternative 2 and Alternative 3 south of SR74 in Peoria which goes through private master planned communities as similar to the Preferred Alternative which places the line north of SR74 on BLM land in Peoria and Maricopa County. The DEIS incorrectly characterizing zoned and legally vested land in varying stages of pre-development process as vacant, undeveloped, grazing land. Before a home is constructed within a planned community, there are many phases in the development process, not all viable development activity is visually apparent. There is insufficient or incorrect analysis in Alternative 2 and Alternative 3 in the resource areas of Land, Transportation, Recreation, Visual Resource and Socioeconomics.

The National Environmental Policy Act (NEPA) requires the DEIS to analyze the impacts of each alternative on past, present and reasonably foreseeable future actions or development. While the DEIS notes Lake Pleasant

¹ FLPMA, P.L. 94-579, §202(c) (9)

Heights as a Reasonably Foreseeable Development within Appendix 4B², the DEIS does not analyze the impacts of Alternative 2 and Alternative 3 to future residents of Lake Pleasant Heights, that could occupy homes prior to APS initiating construction of the line.

The DEIS should consider future roads as foreseeable developments. Much of this has been excluded from the impact analysis and should be noted. In addition to the height and width associated with the ADOT and MAG future planning for SR74³ to 6-10 lanes, regional arterials and streets are also planned south of SR74 within the Study Area identified in the DEIS. These future roads will connect master planned communities, create major intersections for commercial development and employment centers and will connect with SR74 from the south, at major interchanges. A map showing the location of these planned roads relative to Alternative 2 and Alternative 3 and the change in traffic patterns and dispersal of trips for these planned street and regional connection roads have been omitted in the DEIS analysis.

The devaluing of land due to transmission lines has been incompletely evaluated. There are two studies provided by the NAHB which were submitted to BLM, but was not included showing Tucson, Arizona; which should be considered a very relevant comparison, with market data resulting in a negative impact of over 25%⁴. This study should be included as additional literature in Appendix 3A. DEIS making home price comparisons of 2005 and 2009 is either current or accurate for the Phoenix metro market. Consistent improving trends in housing is not recognized.

Socioeconomic resource impacts will occur through the limitations to master planned community ability to develop. The decreased home values, prolonged timeline of sales and increased carrying costs to develop will have a much more drastic impact, which in some cases may force some property tax revenue, sales tax revenue, construction tax revenue, impacts fees, and other city, state and federal income sources to never come to fruition. On page 4-105, the report states that "the net effect on property tax revenue under Alternative 2 would be beneficial, major and long term. These benefits would accrue to taxing entities and the beneficiaries of those taxes." The increased tax base from the future developments will create a drastic difference between what property tax has been represented as grazing land in Alternative 2 and 3 as compared to the more accurate analysis of primary and secondary property taxes and sales taxes generated from suburban community densities.

Homes similar to this area, would, on average, annually contribute approximately \$500 to the County, \$200 to the State Equalization tax, \$100 to the City of Peoria, \$1600 to the Peoria Unified School District, \$450 to the Community College District, \$200 to public services including fire, health care, flood control, and \$1400 in bond tax. These taxation revenues would be threatened from both Alternative 2 and Alternative 3, as both effect hundreds to thousands of dwelling units; both by delaying them coming onto the market or having lower assessed valuations. For each home devalued and/or not built, roughly \$2000 would be stripped from the educational budget or a total of approximately \$4000 per home in general property tax. Using these figures (provided), we believe the analysis of taxation and socioeconomic resources are incorrectly represented.

There is a direct correlation between adding residential rooftops and the development of commercial, retail operations. The DEIS does not portray or analyze the basic economics of residential entitlement, predevelopment, development, marketing and home sales. These activities stimulate a local economy, pay for government, provide public community recreation, provide jobs, and should be accounted for within the socioeconomic impact. An analysis of Peoria's or any Phoenix metro city's source of revenue to their general fund, will illustrate the importance of private investment and commercial and residential development to the economy. While the DEIS is significantly detailed about the economic contributions of off highway vehicle recreation and grazing allotments; the economic contributions created by construction of community infrastructure associated with master planned communities and homes, as well as employment and revenues associated with the sale of goods and services during home construction and occupancy have been ignored in the DEIS socioeconomic analysis.

The DEIS states that the impacts to visual resources in Alternative 2 and Alternative 3 would result in a contrast that would be weak and the long term impact would be negligible. These conclusions are not based on a proper analysis

² Lake Pleasant Heights is included within the Past, Present, and Future Community Developments from the City of Peoria 2010 document within Appendix 4B of the Sun Valley to Morgan 500/230kV Transmission Line DEIS.

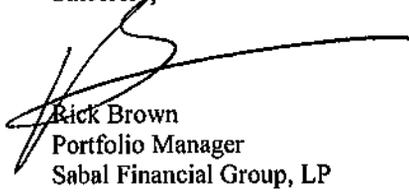
³ ADOT Regional Transportation Plan, which has been included within Appendix 4B of the DEIS.

⁴ *Included with this letter*

required through Key Observation Points guidelines, such that Key Observation Points (KOPs) should first identify residential viewers, including those in reasonably foreseeable developments.

We hope the BLM will conclude this DEIS with the decision to select the Proposed Action as the Agency Preferred Alternative.

Sincerely,



Rick Brown
Portfolio Manager
Sabal Financial Group, LP

RB/le