

APPENDIX K
IRONWOOD FOREST NATIONAL MONUMENT
UTILITY CORRIDOR ANALYSIS

President Clinton designated the Ironwood Forest National Monument (IFNM) by Presidential Proclamation 7320 on June 9, 2000, under the authority of the Antiquities Act of 1906. The monument comprises approximately 128,398 acres of public lands administered by the Bureau of Land Management (BLM), and is generally located 30 miles northwest of Tucson, Arizona. The Proclamation identifies objects of scientific interest for protection.

The IFNM Resource Management Plan (RMP) will provide direction for protecting monument objects and for managing the monument to implement the purposes of the Proclamation. In addition, the Secretary's Order (Order) 3308 seeks to further the purposes of the *Omnibus Public Land Management Act of 2009* (Act), which established the National Landscape Conservation System (NLCS) under the jurisdiction of the Bureau of Land Management (BLM) in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations, and the President's initiative on America's Great Outdoors. This Order recognizes that conservation of this nation's rich natural and cultural heritage is an equally important land management objective, and an integral part of the BLM's multiple-use mission. Conservation is a long-term investment that provides quality of life and economic benefits for current and future generations.

This analysis provides information on the compatibility of designating utility corridors crossing the IFNM with protecting the monument objects identified in the Proclamation, as well as the objectives outlined in the Order.

METHOD OF ANALYSIS

The analysis process is comprised of the following steps:

1. Identification the Monument Objects
2. Description of Utility Corridors on the IFNM and Constraints on Utility Corridor Use in Surrounding Areas
3. Potential Effects to Monument Objects
4. Comments on Utility Corridors Received during Review of Draft RMP
5. Results of Compatibility Analysis

Section 1: Identification of Monument Objects

The IFNM was designated to protect objects of scientific interest within the monument, including the drought-adapted vegetation of the Sonoran Desert, geological resources such as Ragged Top Mountain, and abundant archeological resources. The purpose of the IFNM is to preserve, protect, and manage the biological, cultural and geological resources, and other objects of this area for future generations, and to further our knowledge and understanding of these resources through scientific research and interpretation. These objects are referred to as "monument objects," "objects of the monument," or "objects" in this document.

The text from Presidential Proclamation 7320 identifies the monument objects and lists what those objects are. The table below identifies the specific indicators and thresholds for protection of monument objects, and references the resource management category in which each of the objects are addressed in

this plan. The resource management goals and objectives for each of these resource management categories are identified in Chapter 2 of the IFNM Proposed RMP (see Tables 2-2, 2-4, 2-5, 2-6, 2-8, and 2-10). These goals further define BLM’s actions to protect the objects, including opportunities to enhance or restore objects of the monument (IFNM Proposed RMP, p.1-5).

Table K-1: Protection of Objects within the IFNM

Text from Presidential Proclamation 7320	Monument Object	Object Indicators and Protection Thresholds	Resource Management Category
<p>The landscape of the Ironwood Forest National Monument is swathed with the rich, drought-adapted vegetation of the Sonoran Desert. The monument contains objects of scientific interest throughout its desert environment. Stands of ironwood, palo verde, and saguaro blanket the monument floor beneath the rugged mountain ranges, including the Silver Bell Mountains. Ragged Top Mountain is a biological and geological crown jewel amid the depositional plains in the monument.</p>	<p>Drought-adapted vegetation</p>	<ul style="list-style-type: none"> ▪ Maintain viable natural populations of ironwood, palo verde, saguaros, and other drought-adapted vegetation within the monument. ▪ Prevent avoidable loss of unique vegetation communities on Ragged Top and other rugged mountain ranges. 	<p>Vegetation Special Status Species (refer to Tables 2-4 and 2-6 for resource condition goals and objectives and management actions)</p>
	<p>Rugged mountain ranges</p>	<ul style="list-style-type: none"> ▪ Maintain natural characteristics, processes, and scenic and wildlife values of geologic resources. 	<p>Geology and Caves (refer to Table 2-2 for resource condition goals and objectives and management actions)</p>
<p>The monument presents a quintessential view of the Sonoran Desert with ancient legume and cactus forests. The geologic and topographic variability of the monument contributes to the area’s high biological diversity.</p>	<p>View of the Sonoran Desert</p>	<ul style="list-style-type: none"> ▪ Maintain visual quality of landscapes from important viewing areas. 	<p>Visual Resources (refer to Table 2-10 for resource condition goals and objectives and management actions)</p>
<p>Ironwoods, which can live in excess of 800 years, generate a chain of influences on associated understory plants, affecting their dispersal, germination, establishment, and rates of growth. Ironwood is the dominant nurse plant in this region, and the Silver Bell Mountains support the highest density of ironwood trees recorded in the Sonoran Desert. Ironwood trees provide, among other things, roosting sites for hawks and owls, forage for desert bighorn sheep, protection for saguaro against freezing, burrows for tortoises, flowers for native bees, dense canopy for nesting of white-winged doves and other birds, and protection against sunburn for night blooming cereus.</p>	<p>Ironwood trees</p>	<ul style="list-style-type: none"> ▪ Maintain viable natural populations of ironwood; prevent increased mortality of ironwood stands. 	<p>Vegetation (refer to Table 2-4 for resource condition goals and objectives and management actions)</p>

Text from Presidential Proclamation 7320	Monument Object	Object Indicators and Protection Thresholds	Resource Management Category
<p>The ironwood-bursage habitat in the Silver Bell Mountains is associated with more than 674 species, including 64 mammalian and 57 bird species. Within the Sonoran Desert, Ragged Top Mountain contains the greatest richness of species. The monument is home to species federally listed as threatened or endangered, including the Nichols turk’s head cactus and the lesser long-nosed bat, and contains historic and potential habitat for the cactus ferruginous pygmy-owl. The desert bighorn sheep in the monument may be the last viable population indigenous to the Tucson basin.</p>	<p>Habitat for threatened, endangered, and rare wildlife and vegetative species</p>	<ul style="list-style-type: none"> ▪ Maintain a natural range of variation in vegetation communities to support rare species. ▪ Prevent avoidable loss of special status species. 	<p>Vegetation Wildlife and Wildlife Habitat Special Status Species (refer to Tables 2-4, 2-5, and 2-6 for resource condition goals and objectives and management actions)</p>
<p>In addition to the biological and geological resources, the area holds abundant rock art sites and other archeological objects of scientific interest. Humans have inhabited the area for more than 5,000 years. More than 200 sites from the prehistoric Hohokam period (600 A.D. to 1450 A.D.) have been recorded in the area. Two areas within the monument have been listed on the National Register of Historic Places, the Los Robles Archeological District and the Cocoraque Butte Archeological District. The archeological artifacts include rhyolite and brown chert chipped stone, plain and decorated ceramics, and worked shell from the Gulf of California. The area also contains the remnants of the Mission Santa Ana, the last mission constructed in Pimeria Alta.</p>	<p>Archeological objects of scientific interest</p>	<ul style="list-style-type: none"> ▪ Reduce threats and resolve conflicts from natural or human-caused deterioration of rock art and other prehistoric sites, Archeological Districts on the National Register of Historic Places, artifacts, and remnants of Mission Santa Ana. 	<p>Cultural Resources (refer to Table 2-8 for resource condition goals and objectives and management actions)</p>

Presidential Proclamation 7320 provides guidance for managing the monument for “the purposes of protecting the objects identified.” In addition to the protection thresholds identified above, protection of the monument objects is defined as maintaining the objects over time, such that any human-caused change or impact on the known biological, geological, and archaeological monument object(s) would be undetectable or measurable only in small and localized areas and the integrity of the object(s) would be conserved for future generations.

Section 2: Description of Utility Corridors on the IFNM and Constraints on Utility Corridor Use in Surrounding Areas

Brief History of Utility Corridor in the Monument Area:

Under the Phoenix RMP of 1988, three utility corridors were established in the Silverbell Resource Conservation Area (RCA) located in the southern end of the now designated monument area. According to the Phoenix RMP analysis, the corridors were established in the now monument area “because the scattered land pattern outside of the RCA severely limits the usefulness of such designations” (Phoenix RMP, 1988, p. 84). The RCAs were established as blocks of land for the public purpose of consolidating surface/subsurface ownership in order to improve management efficiency and to reduce cost. The seven RCAs in the Phoenix RMP contain public lands with high resource value and would be intensely managed public lands (Phoenix Draft RMP, 1987, p. xii & 5). Each of the three corridors in the Silverbell RCA was one mile in width. Map 2-11 shows the routes of each corridor within the now IFNM (Attachment 1). These corridors identify priority routes for major utility systems. Generally, the corridors were routed along existing utility systems. Routes for the corridors within the now IFNM were identified only within the Silverbell RCA because public lands outside the RCA were and still are so scattered that the designation of useful corridors is impractical. Currently, the land area associated with the IFNM is being managed under the Phoenix RMP and the National Landscape Conservation System (NLCS) interim guidance.

Section 368 of the National Energy Policy Act of 2005

As the BLM began the IFNM Draft RMP in 2003, the proposal to keep utility corridors within the monument was analyzed as three of four alternatives. As the monument lies between the two most populated cities in Arizona and in order to remain consistent with the National Energy Policy Act of 2005, the BLM proposed allocation of two corridors (Attachment 2) in the IFNM Draft RMP, page 2-69 Alternative C, in order to maintain a reasonable range of alternatives as required by the National Environmental Policy Act (NEPA). During the time of the development of the IFNM Draft RMP, the paradigm was focused on providing opportunities for potential energy development for future use. Section 368 of the National Energy Policy Act of 2005 “prescribes guidelines governing energy right-of-way corridors on Federal land.” Section 368 states in part:

- (c) Ongoing Responsibilities – The Secretaries, in consultation with the Federal Energy Regulatory Commission, affected utility industries, and other interested parties, shall establish procedures under their respective authorities that--
 - 1) Ensure that additional corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land are promptly identified and designated as necessary; and
 - 2) Expedite applications to construct or modify oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities within such corridors, taking into account prior analyses and environmental reviews undertaken during the designation of such corridors.
- (d) CONSIDERATIONS – In carrying out this section, the Secretaries shall take into account the need for upgraded and new electricity transmission and distribution facilities to:
 - 1) improve reliability;
 - 2) relieve congestion; and
 - 3) enhance the capability of the national grid to deliver electricity.

- (e) SPECIFICATIONS OF CORRIDOR – A corridor designated under this section shall, at a minimum, specify the centerline, width, and compatible uses of the corridor.

In essence, the BLM would manage and provide utility corridors to support energy industry needs, both alternative and traditional, and community growth in consideration of other resource values. Two utility companies expressed their support in comments received during the public review period before and after the release of the IFNM Draft RMP to provide the proposed utility corridors. In Section 368 of the National Energy Policy Act of 2005, corridors are sited to avoid, to the maximum extent possible, significant known resource and environmental conflicts.

In accordance with the National Energy Policy Act of 2005, the BLM executed and implemented the Approved Resource Management Plan Amendments/Record of Decision for Designation of Energy Corridors on Federal Land in the 11 Western States of January 2009 (11 Western States ROD), in the IFNM Draft RMP. The 11 Western States ROD designates corridors and directs the BLM to designate energy corridors by amending existing management plans or in new proposed plans that will improve reliability and enhance the national electric grid (11 Western States ROD, 2009, pg. 2). Criteria for siting corridors to be addressed in 11 western states EIS are listed on page 14 of the ROD (Jan 2009). Among these, the initial step in the siting process was to identify an enhanced regional electric grid for the West. Corridors that did not support connectivity within the grid were not considered in the analysis. Corridors could only be on Federal land, excluding Tribal, state and private lands from the analysis. Thus the corridors crossing the IFNM did not rise to the level of consideration in the EIS.

Congress also directed the Agencies to ensure that additional corridors on Federal Land are promptly identified and designated, as necessary (Section 368). The ROD (11 Western States ROD, 2009, pg. 17) states that the BLM will accommodate the need for future energy corridors through its normal land use planning process.

Though the 11 Western States ROD did not specifically identify a potential corridor within the IFNM area, the BLM could elect to add a utility corridor in accordance with the concept of designating energy corridors in new proposed plans.

Surrounding Area Constraints

The restricted land uses in the surroundings areas also influenced the BLM's consideration of designating utility corridors in the IFNM Draft RMP. Current Avra Valley land ownership restricts utility developments connecting the north and south ends of the Avra Valley. The land ownership consists of Saguaro National Park, mostly designated wilderness area; Tucson Mountain Park (Pima County) which is being used as mitigation lands for the Pima County Multi-species Conservation Plan; the Tucson Wildlife Mitigation Corridor owned by the Bureau of Reclamation (BOR, 1990) (Attachment 3), and the Tohono O'odham Nation (the Nation), Garcia strip.

Sonoran Desert Conservation Plan

The Avra Valley region serves as mitigation under the US Fish and Wildlife Service Section 10 permit under the Endangered Species Act to address Threatened & Endangered Species for the Sonoran Desert Conservation Plan (SDCP) (Attachment 4). The SDCP has been developed in Pima County, Arizona to guide regional planning efforts that provide a balance between the conservation and protection of cultural and natural resource heritage. The area covered in the SDCP is 5.9 million acres in the Tucson metropolitan area. The conservation planning effort addresses the problems of declining natural resources and the loss of cultural identity in one of the fastest growing parts of the country.

Bureau of Reclamation Wildlife Mitigation Corridor

Pima County manages the BOR Wildlife Mitigation Corridor with Cooperative Agreement for Use of Project Lands for Wildlife and Plant Conservation and Management Tucson Mitigation Corridor Central Arizona Project (BOR Cooperative Agreement) to prohibit any future developments within the area other than existing wildlife habitat improvements or future wildlife improvements, management or developments (BOR (1990), *BOR Cooperative Agreement*). The management actions listed above were drawn from the BOR Central Arizona Project Environmental Impact Statement and The Fish and Wildlife Coordination Act of 1958 report.

Tohono O'odham Nation

The Nation, a neighboring jurisdiction, does not have a land use plan for areas near the IFNM. Planning decisions for land within the Nation typically are made on a case-by-case basis and involve community, district, and tribal leaders and elected officials in a decision making process that parallels that of the Federal Government. Land is primarily administered by the Tohono O'odham Tribal Council and political subdivisions of the Nation, called districts.

SunZia Project

SunZia Transmission, LLC plans to construct and operate up to two 500 kilovolt (kV) interstate transmission lines originating at a new substation in New Mexico and terminating at Coolidge, Arizona.

In April 2010, one route west of Tucson, near IFNM, was reviewed during the public scoping period. Comments on the so-called "Route F121 (Map from SunZia)," which runs through the eastern end of the Nation and the western edge of the BOR Mitigation Corridor, were made public in September 2010, in the "*Addendum to SunZia Southwest Transmission Project Scoping Report, April 2010.*" Comments received from the Nation and the BOR oppose Route F121 (Attachment 5 & 6).

Section 3: Potential Effects to Monument Objects in IFNM Draft RMP

Vegetation Community: Vegetation within the IFNM generally is classified within two upland plant communities. The palo verde cacti-mixed scrub community is dominated by foothill palo verde with scattered cacti, mostly saguaro, and contains other associated species such as mesquite and ironwood (i.e., the ancient legume and cactus forest, which is an object of the monument). The creosote bush-white bursage community is dominated by these species, with scattered triangle-leaf bursage, mesquite, and prickly pear cactus.

Corridor 1 Area: Vegetation consists of foothill palo verde with scattered cacti, mostly saguaro, and contains other associated species such as mesquite and ironwood (i.e., the ancient legume and cactus forest, which is an object of the monument).

Corridor 2 Area: Vegetation is dominated by creosote bush and white bursage, with scattered triangle-leaf bursage, mesquite, and prickly pear cactus. No vegetative objects of the monument exist in this corridor. Areas on either side of the corridor are more diverse in vegetation and provide shelter in travel corridors for wildlife. The area three miles to the east on the Nation is a riparian corridor along the Brawley Wash that is a major north-south movement corridor for wildlife identified in the SDCP (Attachment 4).

Corridor 1



Corridor 2



Wildlife Habitat: The fauna of the IFNM include a diversity of game and nongame wildlife species, as well as migratory birds, typically found in the Sonoran Desert. Several species are restricted to certain locales while others occur widely in suitable habitats. The ironwood-bursage habitat in the Silver Bell Mountains is associated with more than 674 species, including 64 mammalian and 57 bird species (Preplan Analysis for IFNM, 2001). Additional species not specifically noted below also may occur within the IFNM.

Big game species known to occur in the planning area include desert bighorn sheep (an object of the monument), mule deer, and javelina. Small game species that occur in the planning area include desert cottontails, jackrabbits, and quail. Non-game species, including songbirds, raptors, reptiles and one amphibian, are also found within the IFNM.

Land use patterns on the IFNM influence wildlife habitat connectivity. Factors contributing to fragmentation of wildlife habitats within the IFNM include roads, residential development, mines, undocumented immigrant (UDI) traffic, and off-road driving. Wildlife corridors could connect habitats between the Silver Bell Mountains, West Silver Bell Mountains, and Sawtooth Mountains. The primary function of wildlife corridors is to connect fragmented habitat areas. All washes in the IFNM serve as corridors for wildlife. These corridors facilitate dispersal of individuals of species between patches of remaining habitat.

Special status species include the following categories: (1) species currently listed or considered for listing as threatened or endangered by U.S. Fish and Wildlife Service (USFWS); (2) species listed as sensitive by BLM; (3) species listed as Wildlife of Special Concern in Arizona by Arizona Game and Fish Department (AGFD); (4) Priority Vulnerable Species in Pima County; and (5) plants that have special protection under the Arizona Native Plant Law.

As identified by the BLM, USFWS, AGFD, and Pima County's Sonoran Desert Conservation Plan, 122 special status species occur in Pima and Pinal Counties. Of this total, four species with Federal status are known to occur in the planning area and are considered to be objects of the monument: lesser long-nosed bat, Tucson shovel-nosed snake, Sonoran desert tortoise, and Nichol Turk's Head cactus. The other special status species that is not federally listed and has the potential to occur in the IFNM is the cactus ferruginous pygmy owl (Arizona Game and Fish Department, Heritage Data Management System, November 24, 2010).

Corridor 1 Area: Wildlife consists of small game species, such as desert cottontails, jackrabbits and quail. The big game species include mule deer, javelina, desert bighorn sheep, and non-game species include songbirds, raptors, and reptiles. The monument objects in Corridor 1 include desert bighorn sheep and special status species.

Corridor 2 Area: Wildlife consists of desert cottontails, jackrabbits, quail, songbirds, raptors, and reptiles. No monument objects related to wildlife are in Corridor 2; although, washes stemming from the Brawley Wash on the Nation to the east and washes in the IFNM to the west of Corridor 2 serve as corridors for wildlife. These wildlife corridors facilitate dispersal of individuals of species between patches of remaining habitat.

Scenic Resources: Visual resources on the IFNM lands are an important part of the landscape viewed from public travel routes and populated areas and are considered a monument object, including the Avra and Santa Cruz valleys, I-10, Tucson, Marana, Oro Valley, Casa Grande, and other nearby communities. The landscape in the IFNM exhibits outstanding examples of the Basin and Range, Sonoran Desert Section (which is an object of the monument), with visual resources in largely natural appearing condition. The scenic quality has many outstanding landform, vegetation and special features that attract

sightseeing activities and define the surrounding area's landscape settings. Visual sensitivity is high, and viewing distance is in the foreground and middle-ground from important viewing areas within and outside the monument. Its rugged, steep-sloped mountains (which are objects of the monument) form the background and skyline, defining the flat valleys where agricultural, rural and urban development exists. Due to landform, vegetation and visibility characteristics, IFNM lands are vulnerable to visual impacts from activities that involve vegetation clearing, earthwork disturbance, and placement of structures, which can cause strong visual contrasts noticeable in foreground to background views.

Corridor 1 Area: In the IFNM Draft RMP Alternative C, the VRM for Corridor 1 was Class III. Effects on the visual and scenic resources would degrade the VRM to Class IV if another above or underground utility was allowed.

Corridor 2 Area: In the IFNM Draft RMP Alternative C, the VRM for Corridor 2 was Class IV. Effects on the visual and scenic resources would remain a Class IV if another above or underground utility was allowed.

Cultural Resources: The primary motivation for protecting and preserving cultural resources is to enhance public and professional interpretation and appreciation of our cultural heritage. Public interpretation within the IFNM has been limited primarily to occasional guided tours of Hohokam petroglyph sites (which are objects of the monument described in the Proclamation). Future opportunities for public interpretation include heritage publications, other media products, interpretive signs and kiosks, and visitor centers.

Archaeological sites reflecting both prehistoric and historic-era occupation of the region are so abundant that only a small percentage of the sites have been recorded. Twenty-one documented surveys have, in the aggregate, inventoried approximately 21,194 acres (33.1 square miles) for cultural resources within the IFNM. The surveys encompass about 13 percent of the public land and about 9 percent of the nonpublic lands within the IFNM boundary. A total of 279 archaeological and historical sites have been recorded on BLM land within the IFNM, 175 of which have been recommended eligible for the National Register of Historic Places. Survey data suggest there could be approximately 2,300 sites on the BLM surface estate within the IFNM.

To date, no officially designated places within the IFNM have been identified as having traditional cultural significance, but knowledge about traditional use areas has been obtained by the BLM through Tribal consultation efforts. Tribes with traditional cultural affiliations within the region are known to have concerns about treatment of human remains, funerary objects, sacred objects, and objects of cultural patrimony that are sometimes present within archaeological sites. Information gathered through tribal consultation efforts has revealed that members of the Four Southern Tribes, which The Nation borders the IFNM, also do consider some places within the IFNM that were used traditionally, such as stands of saguaro where fruit was collected, as having cultural significance.

Corridor 1 Area: The corridor touches the edge of the Los Robles Archaeological District, which is on the National Register of Historic Places. Additional future development in the Corridor 1 area could affect important cultural sites.

Corridor 2 Area: No known significant cultural objects of the monument would be affected if additional utility developments occur in the future. No significant sites are within two miles of Corridor 2.

Section 4: Comments on Utility Corridors Received During Review of Draft RMP

During the public review period of the IFNM PRMP, the BLM received several written and verbal comments from utility companies, as well as other members of the public for and against having utility corridors within the IFNM.

Comments included having no corridors, providing corridors that would provide for future electrical reliability for the state, assuring corridors avoid sensitive areas, providing one mile corridors, assuring ROW renewals and expanding on the existing authorized width to accommodate future needs.

The BLM reviewed all comments received and aimed to incorporate a balanced response to comments in the IFNM Proposed RMP.

Section 5: Results of Compatibility Analysis

Rationale for Corridor Designation in IFNM Draft RMP:

After analyzing impacts to monument objects in the proposed utility corridors, the BLM proposed to accommodate utility corridor use in the IFNM Draft RMP. The two proposed corridors in the IFNM Draft RMP Alternative C currently have three active ROWs. In Corridor 1, El Paso gas lines currently have two parallel ROWs totaling approximately 100 feet wide from the centerline within the existing corridor that is 1 mile wide. The gas lines are 13 miles in length through the IFNM, transcending over BLM (8 miles), State, and private lands. The corridor contains a pipeline access road. In Corridor 2, Southwest Transmission Cooperative has one 50-foot ROW from the centerline within the existing corridor that is 1 mile wide. Current facilities in Corridor 2 contain a 115 kV line and access road. The 115 kV line is three miles long, two miles on BLM land and one mile on State land. One applicable term of the ROW is that the maintenance road stays within the existing footprint. However, this current ROW expires in October 2011.

Under the IFNM Draft RMP, the corridor footprint was greatly reduced. Corridor 1 (underground use only) decreased from one mile to 200 feet wide and Corridor 2 (infrastructure above or below ground) from one mile to 300 feet wide, reducing Corridor 1 by 96% and Corridor 2 by 94%. The purpose of the size reduction in utility corridor width from the Phoenix RMP to the IFNM Draft RMP was to protect the objects of the monument and visual and scenic resources as described in the IFNM Proclamation, while still being consistent with the National Energy Policy Act of 2005.

Rationale for Corridor Designation Changes from IFNM Draft RMP to Proposed RMP:

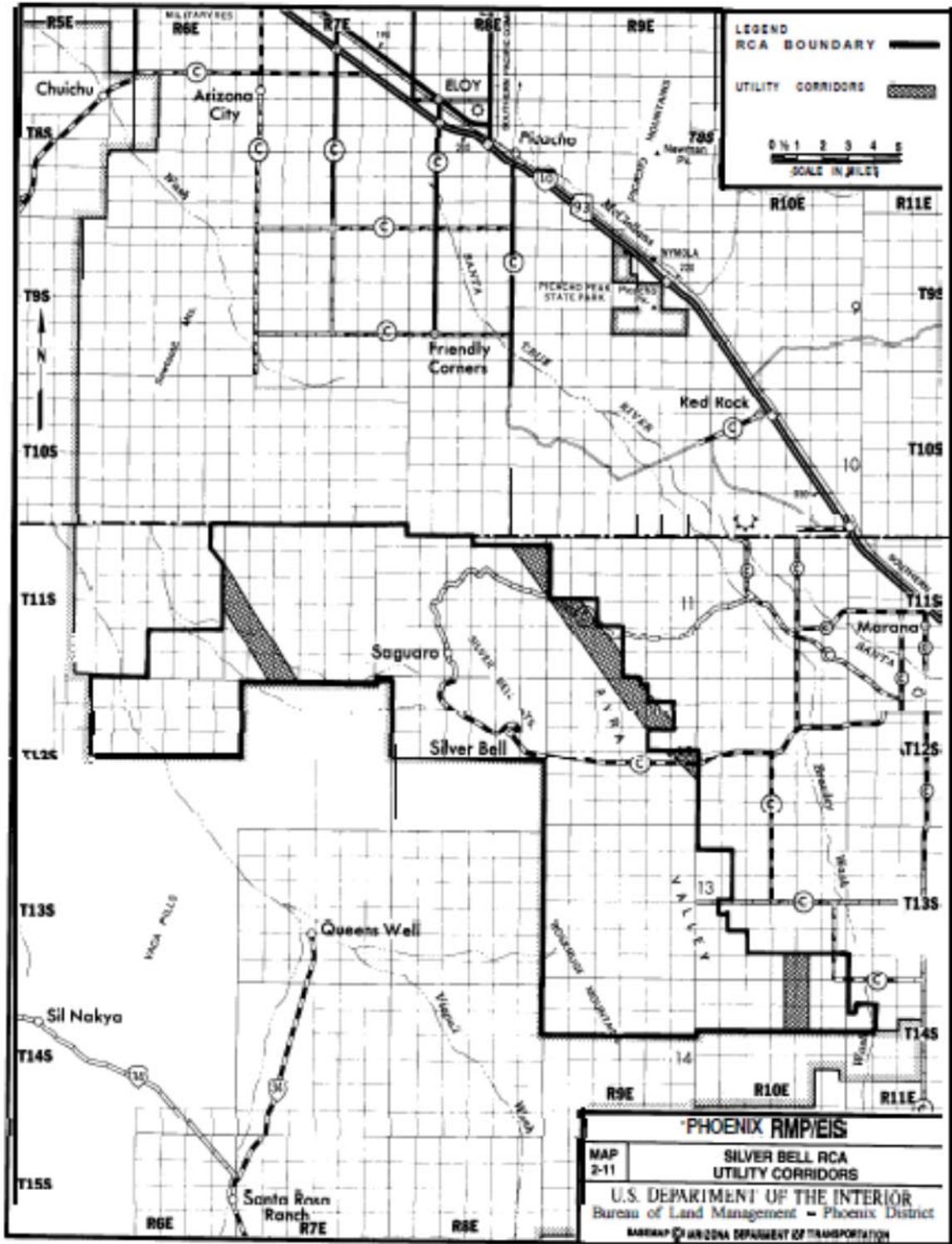
The change in utility corridor designation from the IFNM Draft RMP Page 2-69 Alternative C to the IFNM Proposed RMP Page 2-69 Alternative B is that no utility corridors would be designated as shown on Map 2-16 (Attachment 7). Comment review and the BLM's objective to protect monument objects as specified in the Proclamation and Secretarial Order 3308 of November 15, 2010, provide a basis for this modification.

The purpose of the suggested change to the IFNM Draft RMP corridors was to further protect the monument objects that would be impacted should future additional utility development occur. Under Alternative B, allocating the IFNM as an exclusion area without identifying any utility corridors would result in considering land use authorizations for rights-of-way only when required by law. This would exclude the potential for new rights-of-way for electric generating facilities (including renewable), transmission lines, pipelines, and other utilities. The IFNM Proposed RMP decision is designed to allow for further analysis should a proposal be submitted. Therefore, the changes are based on the need to

balance the National Energy Policy Act of 2005 (PL 109-58) and Secretarial order 3308: Management of the National Landscape Conservation System, while complying with NEPA (PL 91-190 as amended) to analyze a full range of alternatives and to appropriately consider and respond to input from the public sector.

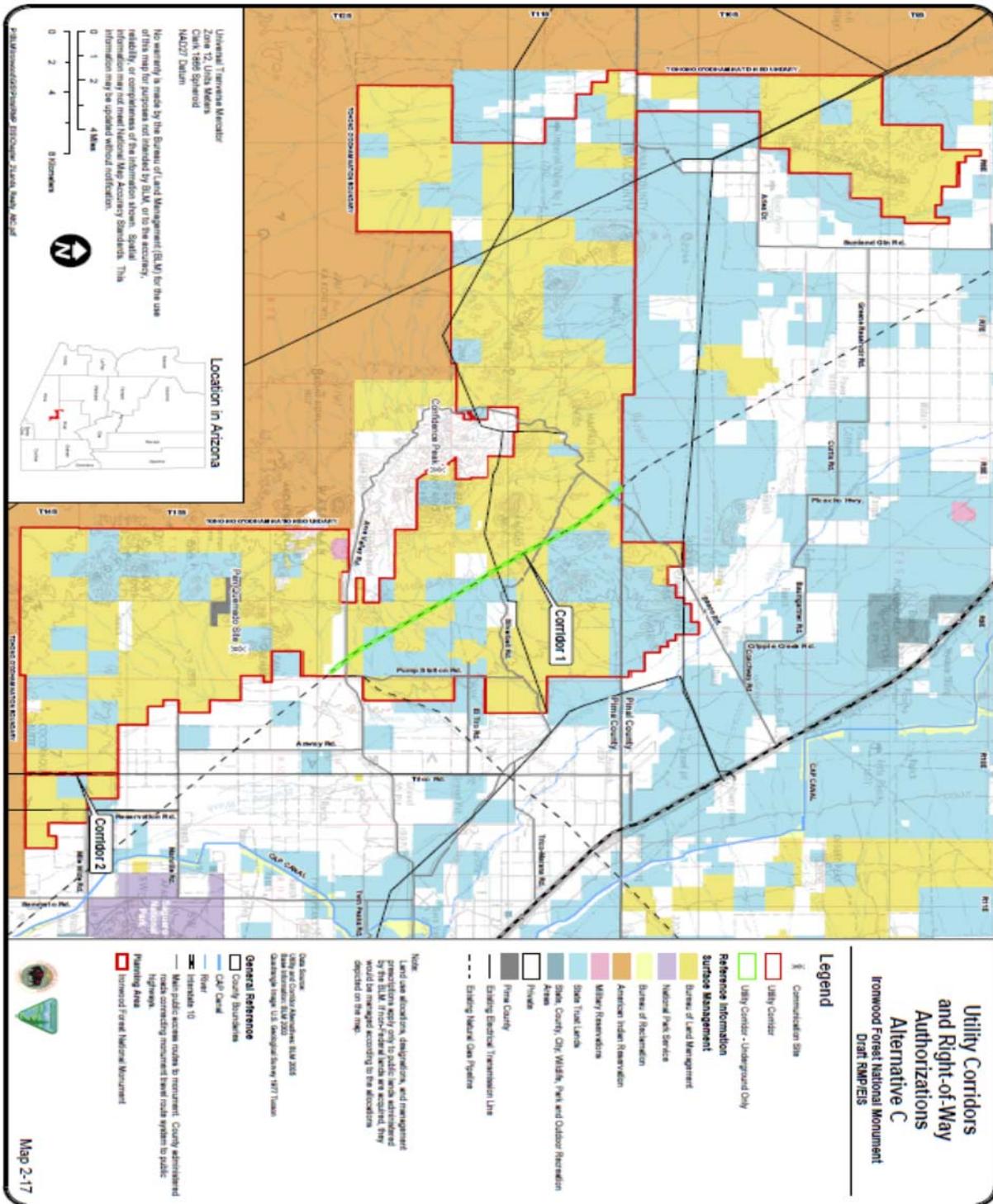
Attachment 1

Utility Corridor Designations Phoenix RMP Map 2-11

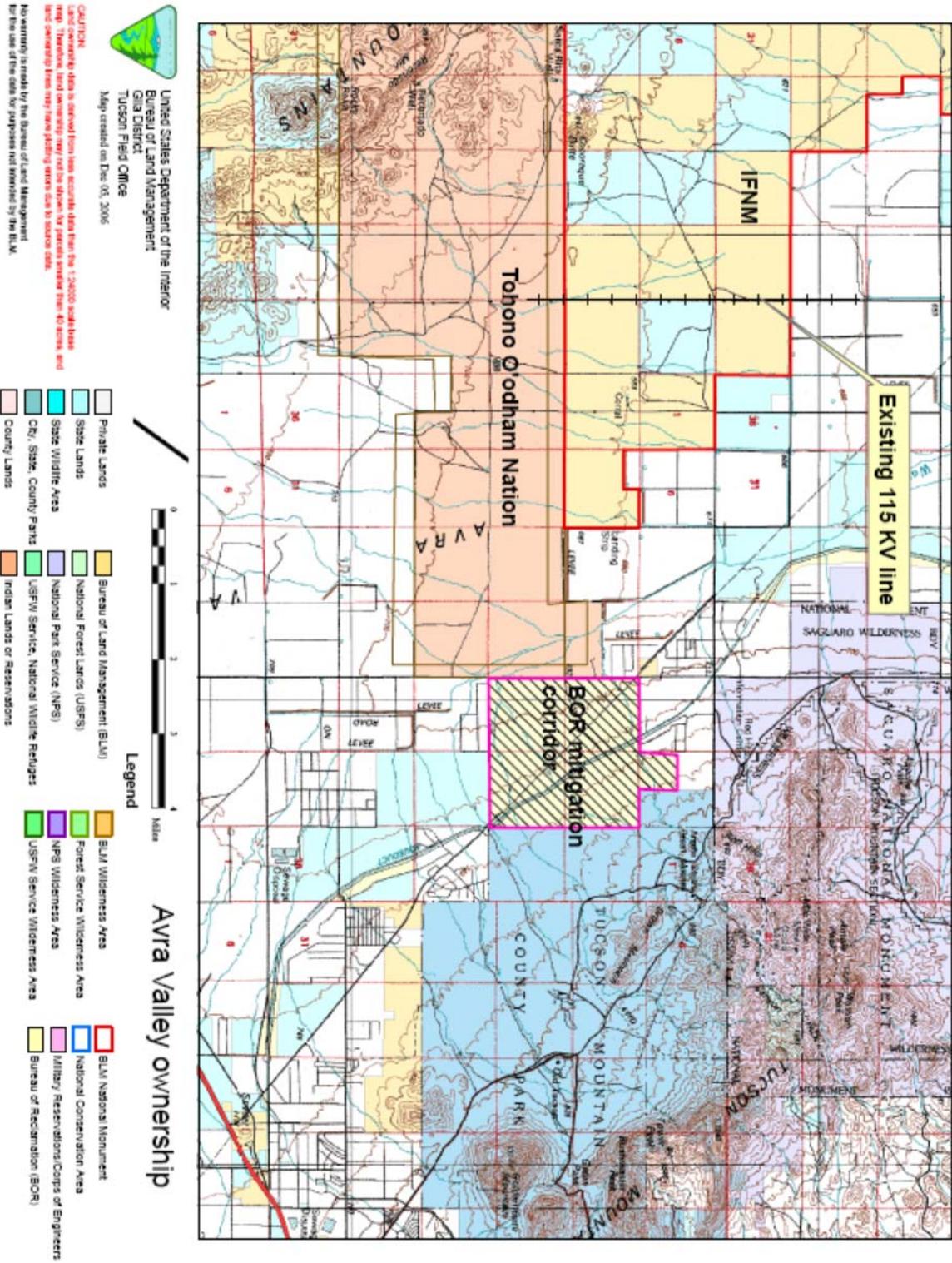


Attachment 2

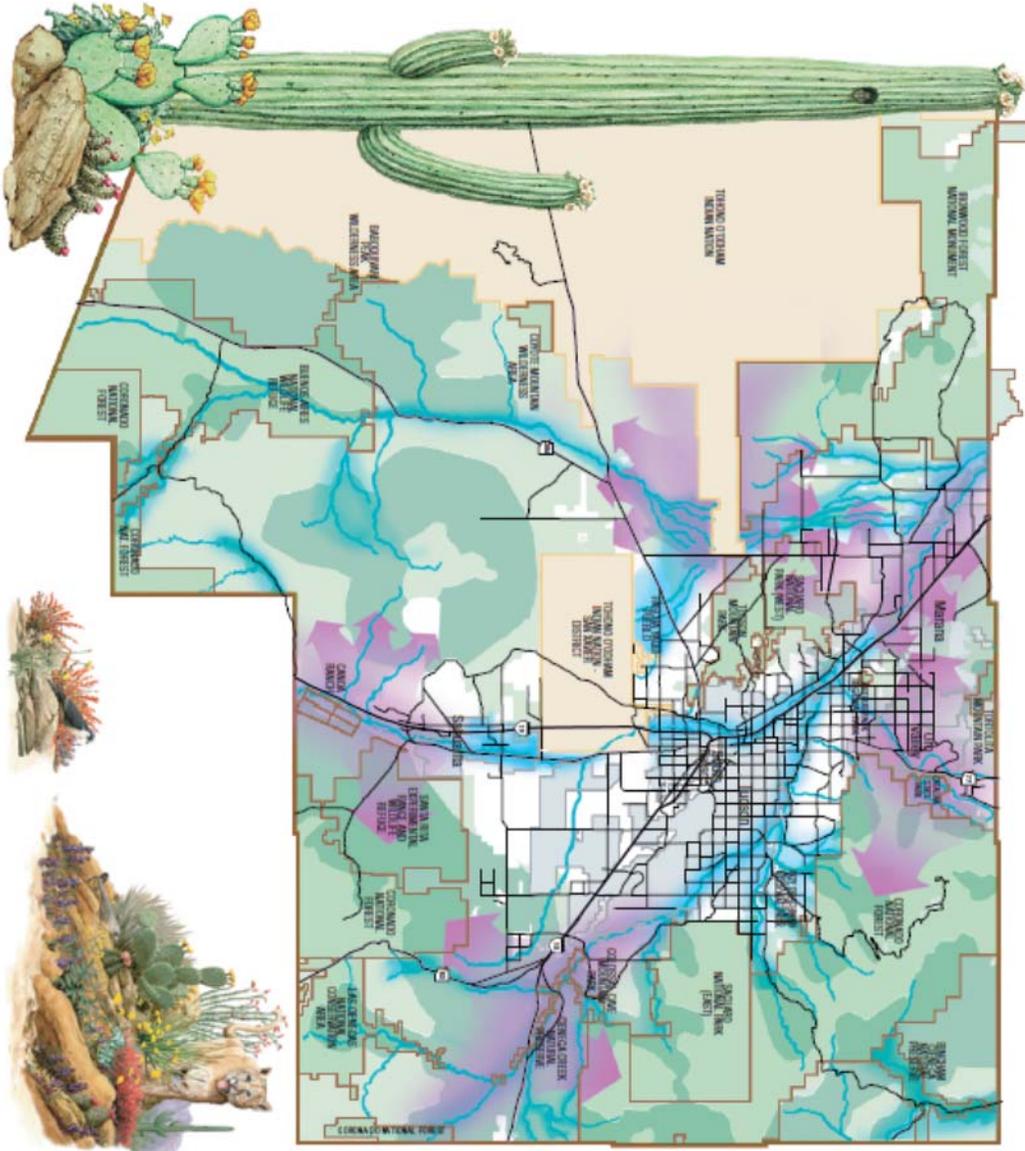
Maps 2-17 – Utility Corridors and Rights-of-Way Authorizations Alternative C IFNM Draft RMP



Attachment 3



Attachment 4



**SONORAN DESERT
CONSERVATION PLAN**

**BIOLOGICAL CORRIDORS
AND CRITICAL HABITAT**

The work on the biological corridors and critical habitat element of the Sonoran Desert Conservation Plan revealed that biological corridors and critical habitat are essential for the long-term sustainability of all the elements it critical in formulating a viable land management plan that ensures continuing biodiversity for Pima County.

LEGEND

-  Important Riparian Areas
-  Biological Core Areas
-  Multiple Use Areas
-  Wildlife Corridors

PIMA COUNTY BOARD OF SUPERVISORS
 Sharon Broson, Chair • District 3
 Ann Day • District 1
 Raymond Vasquez • District 2
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 Richard Egan • District 5

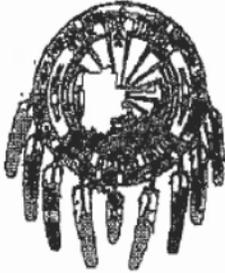
Chuck Heckelberg • Pima County Administrator

Visit the Sonoran Desert Conservation Plan Web site
www.pima.gov/sdcp

Sonoran Desert Conservation Plan
 130 West Congress, 10th floor
 Tucson, AZ 85701
 520.740.8162

Attachment 5

Tohono O'odham SunZia Comment Letter



**TOHONO O'ODHAM NATION
SCHUK TOAK DISTRICT**

P.O. Box 368
Sells, Arizona 85634
Telephone (520) 383-4660
Fax (520) 383-5575



**RESOLUTION OF THE SCHUK TOAK DISTRICT COUNCIL
(Opposing SunZia Southwest Transmission Line Project)**

Resolution No. ST-11-06-10-174

WHEREAS: the Schuk Toak District Council held a regular scheduled meeting on November 06, 2010 with a quorum present; and

WHEREAS: at a meeting held on July 10, 2010 the SunZia Representatives and BLM presented a proposal to the Schuk Toak District Council requesting approval to construct and operate up to two 500 kilovolt (kV) transmission lines and new intermediary substations within an estimated 500-mile long corridor; and

WHEREAS: the Schuk Toak District Council did review and discuss the proposed project; and

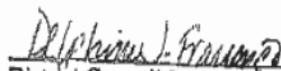
WHEREAS: the Garcia Strip Community raised questions and concerns regarding the transmission line; and

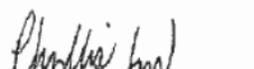
WHEREAS: on October 31, 2010, the Garcia Strip Community did review and discuss the proposed transmission line presented by SunZia and Bureau of Land Management (BLM).

NOW THEREFORE, BE IT RESOLVED that the Schuk Toak District Council, and the Garcia Strip Community hereby opposes the 500 kilovolt transmission lines and new intermediary substations within an estimated 500-mile long corridor.

BE IT FINALLY RESOLVED that the foregoing resolution was enacted by the Schuk Toak District Council, with a vote of 18 FOR; 0 AGAINST; 0 ABSENT; pursuant to the powers vested in the Council by Section 5 of Article IX of the Constitution of the Tohono O'odham Nation.

ATTEST:


District Council Secretary


Phyllis Juan, Chairperson

Attachment 6

BOR SunZia Comment Letter

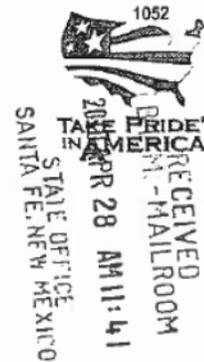


IN REPLY REFER TO:
PXAO-1500
ENV-7.00

United States Department of the Interior

BUREAU OF RECLAMATION
Phoenix Area Office
6150 West Thunderbird Road
Glendale, Arizona 85306-4001

APR 26 2010



MEMORANDUM

To: Mr. Adrian Garcia, Project Manager, SunZia Southwest Transmission Project, Bureau of Land Management, New Mexico State Office, P.O. Box 27115, Santa Fe, New Mexico 87502-0115

From: Carol Lynn Erwin
Area Manager *Carol Erwin*

Subject: Scoping Comments on Expansion of Study Area, SunZia Southwest Transmission Project

In response to your April 2010 Project Update, and expansion of the SunZia Project study area, I am providing comments specific to the Avra Valley corridor. This memorandum supplements my earlier written comments dated February 25, 2010, on the SunZia Project. The Bureau of Reclamation recognizes and supports the need for renewable energy sources.

I appreciated the opportunity for Mr. Bruce Ellis of my staff to meet with you and the project proponent and consultants on April 2 in Tucson. However, the Avra Valley route that was discussed in that meeting would bisect Central Arizona Project's (CAP) Tucson Mitigation Corridor, which serves as a preserve for wildlife and plants and provides an undeveloped corridor for large mammals to move between the Tucson Mountains to the east and the Roskruge Mountains to the west. Reclamation acquired the 4.25-square-mile corridor as partial mitigation for biological impacts resulting from construction and operation of the CAP Tucson Aqueduct. Reclamation signed a cooperative agreement with the Arizona Game and Fish Department and the Pima County Parks and Recreation Department for the management of these lands, including agreement to oppose any further development within the corridor. Reclamation has consistently opposed, and continues to oppose, use of the corridor for any use that could adversely affect plants, wildlife, and wildlife movement for which the corridor was established.

I would also point out that visual impacts from sensitive viewing areas such as the Arizona-Sonora Desert Museum were a major issue during planning for the CAP Aqueduct in this area. The Tucson Mitigation Corridor, by preserving these 4.25 square miles of land from future development, helped to mitigate these impacts as well. Based on commitments we have made to prohibit future development within this mitigation corridor, we cannot support the Avra Valley route and do not believe it is a reasonable alternative that should be considered in the Environmental Impact Statement for the SunZia Project.

If you have any questions, please contact Mr. Bruce Ellis of my staff at 623-773-6250.



Attachment 7

Maps 2-17 – Utility Corridors and Rights-of-Way Authorizations Alternative B IFNM Proposed RMP

