

SunZia Southwest TRANSMISSION PROJECT

ADDENDUM TO **SunZia Southwest Transmission Project** **Scoping Report – April 2010**

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Bureau of Land Management
New Mexico State Office

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LIST OF ACRONYMS AND TERMS

AANG	Army Air National Guard
AFB	Air Force Base
Applicant	Entity submitting a SF-299 right-of-way application to the BLM
AZGFD	Arizona Game and Fish Department
BLM	Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DOD	Department of Defense
EIS	Environmental Impact Statement
EMF	Electric and magnetic field
FO	[BLM] Field Office
NEPA	National Environmental Policy Act
NMSO	[BLM] New Mexico State Office
NOA	Notice of Availability
NWR	National Wildlife Refuge
Proponent	Entity proposing the project; see also “Applicant”
WSMR	White Sands Missile Range

1. FORWARD

This document, published as Volume III, is an addendum to the *SunZia Southwest Transmission Project Scoping Report – April 2010, Volumes I and II*. The April 2010 scoping report describes the process and outcomes of scoping that occurred between May 29 and November 27, 2009, as led by the Bureau of Land Management (BLM) New Mexico State Office (NMSO) in its Environmental Impact Statement (EIS) efforts for the SunZia Southwest Transmission Project (the project).

This addendum addresses the results of additional project scoping that occurred March 31 through June 10, 2010. The additional scoping was necessary to allow for public and agency participation within the expanded study area in both New Mexico and Arizona. This document provides an overview of the BLM's effort to solicit scoping participation during this specific period, summarizes the issues raised during the scoping process, and informs the public of the decisions that have been made during the scoping process.

This addendum defers to the April 2010 scoping report for information on the EIS process, proposed project, and BLM regulatory authority and decision-making process. The April 2010 scoping report can be accessed online at www.blm.gov/nm/SunZia, or by contacting the BLM NMSO at (505) 954-2199 or the BLM NMSO Public Room at (505) 954-2098 to make a request.

2. PROJECT EIS BACKGROUND

The Council on Environmental Quality (CEQ) regulations require scoping meetings to be conducted in support of the EIS process pursuant to the National Environmental Policy Act (NEPA). Scoping is the process by which the BLM solicits input on the issues, impacts, and potential alternatives that the project EIS will address, as well as the extent to which those issues and impacts will be analyzed. The scoping process helps to ensure that a reasonable range of alternatives, as required by CEQ NEPA regulations, will be evaluated in the EIS.

In response to scoping comments received during previous scoping periods (provided in *SunZia Southwest Transmission Project Scoping Report – April 2010*), the preliminary study undertaken, and consultations with interested parties, the BLM expanded the project study area (Figure 1a) to consider the following additional potential alternative transmission line routes in Arizona and New Mexico:

Arizona – Alternative routes within Pima County in the Tucson area, and west of the San Pedro River, were identified in addition to the initial proposed route and range of alternative routes that were presented during previous scoping. The additional alternative routes were identified in response to scoping comments, which included support for locating the proposed project within the Interstate 10 highway corridor and existing utility corridors. Other comments expressed concern for potential environmental impacts to grazing/ranching operations and private lands/property values; biological resources (especially waterfowl/migratory birds, special status species, and wildlife corridors); cultural and visual resources; local economics; and unauthorized off-road traffic on the proposed access roads. These alternative routes, shown in Figure 1b, are identified as routes beginning with the letter F.

New Mexico – Alternative routes within Lincoln, Torrance, Valencia, and Socorro counties, north of Socorro, New Mexico were suggested as options to the initially proposed and alternative routes north of White Sands Missile Range (WSMR) in the vicinity of Highway 380. The additional alternative routes were suggested to avoid impacts to military training and testing operations based at WSMR; Holloman, Kirtland, and Canon Air Force bases; and Fort Bliss. These alternative routes, shown in Figure 1c, are identified as routes beginning with the letter E.

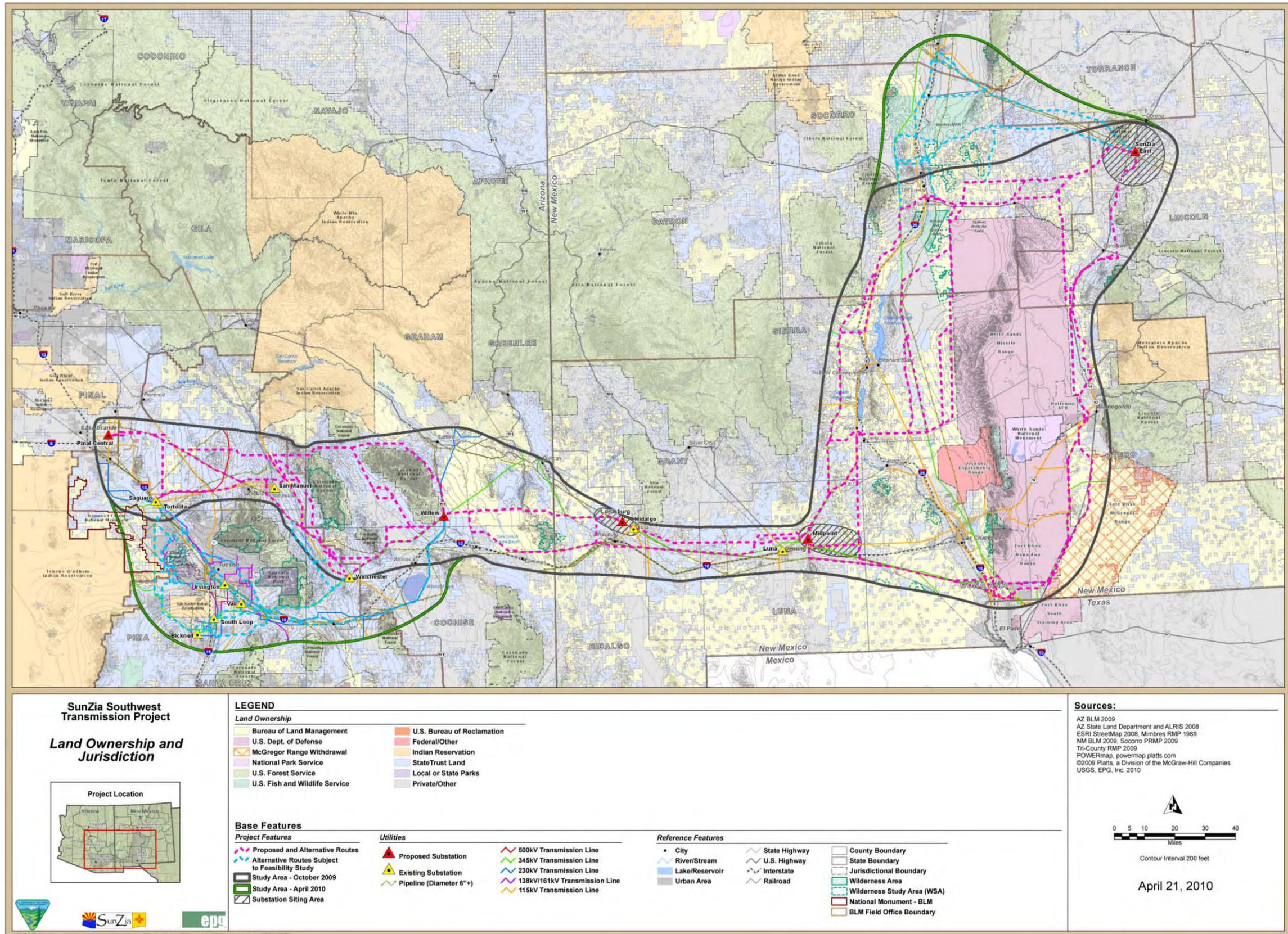


Figure 1a Proposed Project and Alternative Routes Overview

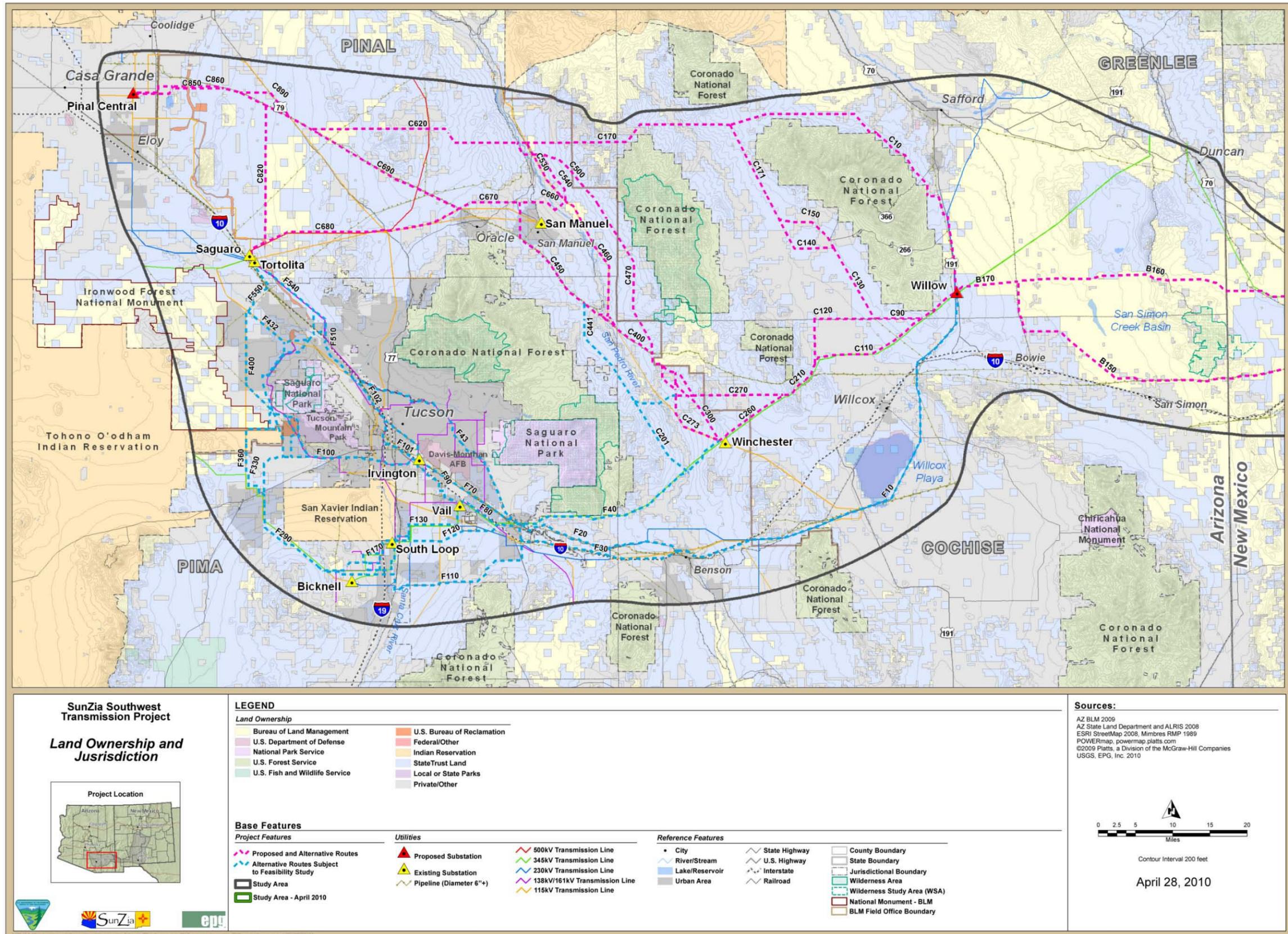


Figure 1b Proposed Project and Alternative Routes – Arizona Expanded Study Area

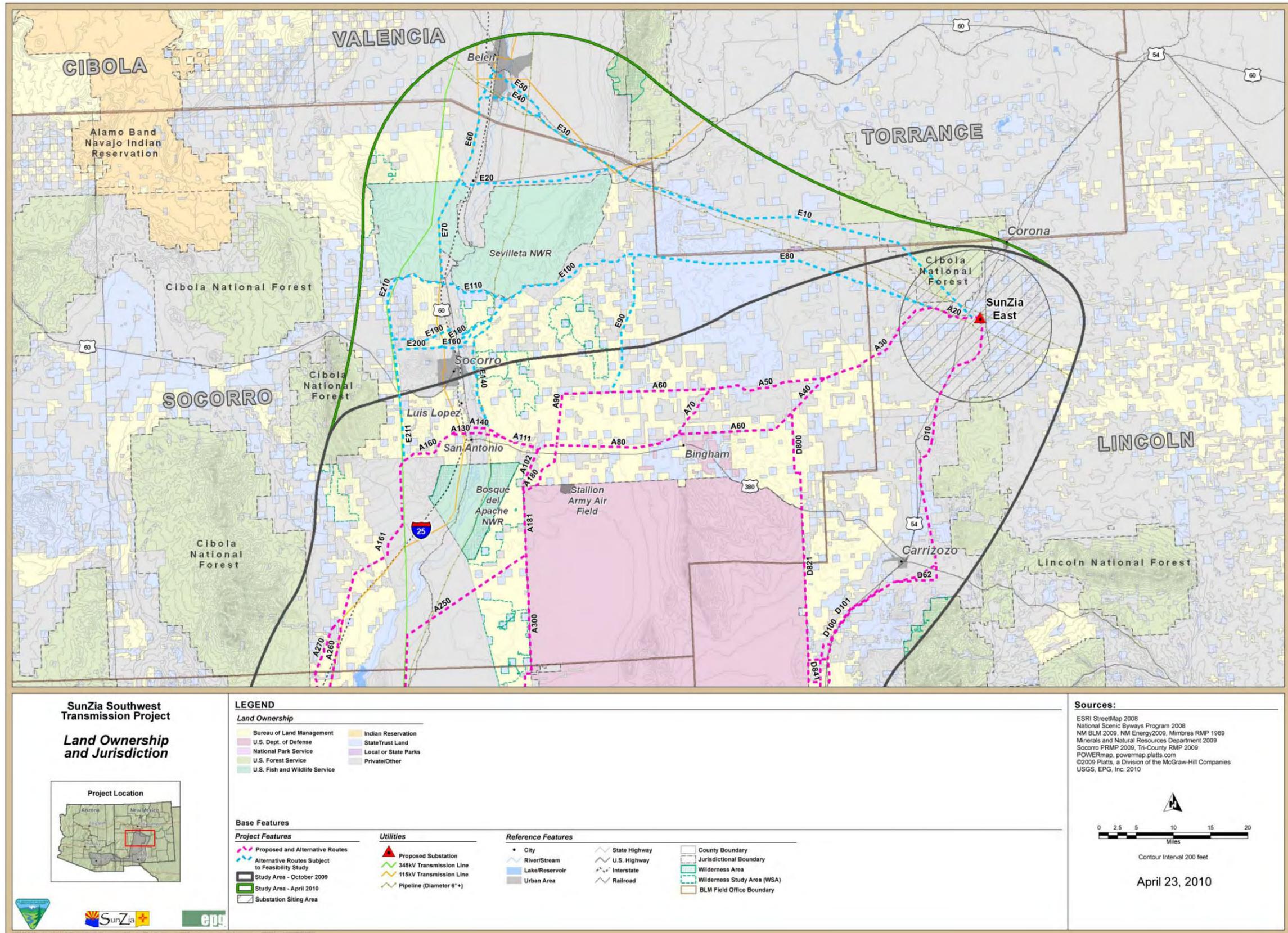


Figure 1c Proposed Project and Alternative Routes – New Mexico Expanded Study Area

3. SCOPING

3.1. Notice of Scoping

Public noticing of the proposed project’s scoping meetings was accomplished through the distribution of both a news release to media outlets and a project newsletter, and publication of display advertisements in local newspapers.

The BLM issued a news release on March 31, 2010, announcing additional scoping to address the study area expansion in New Mexico and Arizona. Concurrently, a copy of the news release was posted to the BLM project website. The news release was distributed to the media outlets in New Mexico and Arizona, as indicated in Tables 1 and 2. A copy of the news release is provided in Appendix A.

Albuquerque Journal	KSWV Radio, Santa Fe
Albuquerque Journal – North	KUNM Radio, Albuquerque
Albuquerque Journal – City Desk	KVIA TV, El Paso
Associated Press, Albuquerque	Land Letter
Carlsbad Current Argus	Las Cruces Bulletin
Cibola Beacon	Las Cruces Sun News
Deming Headlight	Lordsburg Liberal
El Paso Times	Los Alamos Monitor
Entravision TV, Albuquerque	Magdalena Mountain Mail
Farmington Daily Times	Mountain View Telegraph, East Mountains
KASA TV	New Mexico Department of Tourism
Hobbs News	New Mexico Independent
KCHS Radio, Truth or Consequences	Prime Time Christian Broadcasting
KCKN Radio, Albuquerque	Quay County Sun
KCRX Radio, Roswell	Roswell Record
KDCE Radio – Espanola	Ruidoso News
KDEM/KDOT Radio, Deming	Sandoval Signpost
KGRT Radio, Las Cruces	Sangre Chronicle – Angel Fire
KKOB Radio, Albuquerque	Santa Fe New Mexican
KNFT/KSCQ Radio, Silver City	Silver City Daily Press
KNME TV, Albuquerque	Silver City Press and Independent
KNUW Radio, Santa Clara	Silver City Sun-News
KOAT TV, Albuquerque	Socorro Daily Chieftain
KRQE TV, Albuquerque	Taos News
KRST Radio, Albuquerque	The Herald, Elephant Butte
KRWG Radio, Las Cruces	Western Livestock Journal
KSFR Radio, Santa Fe	

Ahwatukee Foothills News	KAAA/KZZZ AM	KMSB – Fox Tucson	Phoenix Channel 11
Ajo Copper News	KAET – Channel 8	KNAU	Presna Hispana
Apache Junction Independent	KAET – Channel 8 – Horizon	KNAZ – NBC Flagstaff	Queen Creek Independent
Apache Junction News	KAFF FM	KNST	Red Rock TV Channel 16
Arizona Capitol Times	KAWC AM & FM	KNTR AM	Rim Country Gazette
Arizona Daily Star	KAZM AM	KNUV AM	Sedona Red Rock News
Arizona Free Press	KAZ-TV	KNXV TV--Channel 15	Sierra Vista Herald
Arizona News Radio Network	KBLU AM	KOLD – CBS Tucson	Sonoran News
Arizona Republic	KCUB AM	KPHO TV--Channel 5	Surprise Today
Arizona Silver Belt	KDXU AM	KPHX AM	Tempe Channel 11
Associated Press	KECY TV – Fox	KPNX – Channel 12	The Arizona Business Gazette
Associated Press Northern Arizona	KEJR TV	KSAZ TV--Channel 10	The Bisbee Observer
Associated Press Phoenix	KESE & KWUB TV	KTAN AM	The Daily Courier
AZ Daily Sun	KFFN AM	KTAR AM	The Desert Advocate
Buckeye Sun	KFMM FM	KTAR FM	The Dixie Weekly
Buckeye Valley News	KFNN AM	KTNN-AM	The Glendale Star
Capitol Media Services	KFNX AM	KTVK TV--Channel 3	The Payson Roundup
Chandler Channel 11	KFPH-CA TV	KUTP TV--Channel 45	The Spectrum
Clear Channel	KFYI AM	KVNA AM	The Sun
Cox Communications Phoenix	KGLN TV	KVOA – NBC Tucson	Today In Dixie
Cronkite Newswatch	KGME AM	KZNU AM	Today's News-Herald
Daily News-Sun	KGUN – ABC Tucson	La Voz	Tucson Citizen
Desert Leaf	KGUY AM	Mesa Channel 11	Univision
Douglas Dispatch	KHOT & KHOV FM	Metro Networks Phoenix	VOICEAMERICA
East Mesa Independent	Kingman Daily Miner	Mohave Valley Daily News	West Valley View
East Valley Tribune	KINO Radio	NAZ Today	White Mountain Independent
Eastern Arizona Courier	KJAA AM	New Times	Wickenburg Sun
Foothills Focus	KJOK AM	North Scottsdale Independent	Willcox Range News
Fountain Hills Times	KJZZ FM	Outdoors AZ Radio Program	Williams News
Gila Bend Sun	KKNT AM	Peoria Channel 11	
Grand Canyon News	KLNZ FM	Peoria Independent	
Green Valley News and Sun	KMOG	Peoria Times	

Newsletter #3, April 2010, provided an overview of the project, including project participants, description, timeline, purpose and need, and a list of opportunities for public participation during the EIS process. The newsletter is provided in Appendix B.

The newsletter was direct mailed to approximately 1,800 contacts on April 8, 2010. The mailing list comprised contacts provided by the BLM NMSO, Safford Field Office (FO), Tucson FO, Las Cruces District Office, Socorro FO, the third-party consultant (EPG, Inc.), and the Applicant. Also mailed were individuals who requested, via a scoping comment form or BLM project website, to be added to the project mailing list. In addition, the BLM NMSO emailed the news release to people who provided only an email address as their contact information.

Paid display advertisements announcing the time, date, and location of the public scoping meetings were placed in local newspapers throughout the project study area by the Applicant approximately 14 days prior to the scoping meetings. The newspaper publications are listed in Table 3.

Table 3 Newspaper Display Advertisements: Announcement of Scoping Meetings		
Publication Date	Newspaper	Geographic Target
April 13 and 23, 2010	Arizona Daily Star	Tucson, AZ
April 14 and 21, 2010	Arizona Range News	Willcox, AZ
April 14, 2010	El Defensor Chieftain	Socorro County, NM
April 14, 2010	San Manuel Miner	San Manuel, AZ
April 15, 2010	Alamogordo Daily News	Alamogordo, NM
April 15, 2010	Eloy Enterprise	Eloy, AZ
April 15 and 22, 2010	Lincoln County News	Lincoln County, NM
April 15, 2010	Mountain Mail	Socorro, NM
April 15, 2010	Mountain View Telegraph	Torrance County, NM
April 15, 2010	Alamogordo Hollogram	Holloman Air Force Base (AFB), NM
April 15, 2010	Fort Bliss Monitor	Fort Bliss, NM
April 16, 2010	Las Cruces Bulletin	Las Cruces, NM
April 16, 2010	Sierra County Sentinel	Sierra County, NM
April 17, 2010	Valencia County News Bulletin	Valencia County, NM
April 21, 2010	Eastern Arizona Courier	Safford, AZ

Copies of the display advertisements from each newspaper are available in Appendix C.

3.2. Scoping Meetings

3.2.1. Public Scoping Meetings

The BLM conducted two scoping meetings that were attended by 200 members of the public. The scoping meetings were held in an open house format during weekday evening hours (5:00 p.m. to 8:00 p.m.). A summary is presented in Table 4.

Table 4 Public Scoping Meetings		
Meeting Date	Location	Public in Attendance¹
April 27, 2010	Kelly Hall – Socorro County Fairgrounds 1 Fairgrounds Road Socorro, New Mexico 87801	90
April 29, 2010	Holiday Inn – Airport 4550 S. Palo Verde Road Tucson, Arizona 85714	110
Total Attendees		200
¹ For purposes of this report, members of the public exclude project-related individuals (e.g., BLM resource specialists, Applicant staff and project engineer, EIS contractor personnel, and cooperating agency representatives.)		

The open house approach was selected to allow ample opportunity for the public to discuss their issues and concerns one-on-one with project staff. Exhibits were prepared and organized in stations around the meeting room to display project information. EPG geographic information system specialists, with a computer equipped with aerial mapping capabilities, were stationed at the meetings to permit attendees to view areas of interest in relation to the proposed project route and alternatives.

The following materials were available to attendees:

- Project newsletter #3
- Notice of Intent
- Welcome sheet
- Electric and magnetic fields (EMF) summary sheet

Comment form Presentation boards

Copies of the materials are available in Appendix D (excluding a copy of newsletter #3, which is available in Appendix B).

Project staff encouraged attendees to comment on the proposed project in writing by doing one or more of the following:

- Submitting a comment form before leaving the scoping meeting
- Speaking to the attending court reporter
- Submitting a comment online at the BLM project website (www.blm.gov/nm/SunZia)
- Submitting a comment by mail

3.2.2. Agency Scoping

On April 27, 2010, representatives from the following public agencies and organizations attended the public scoping meeting in Socorro, New Mexico:

Holloman AFB
 New Mexico Economic Development Department
 New Mexico Military Base Planning Commission
 New Mexico Renewable Energy Transmission Authority
 New Mexico State Land Office

Office of U.S. Representative Harry Teague
Office of U.S. Senator Jeff Bingaman
Office of U.S. Senator Tom Udall
Rio Grande Agricultural Land Trust
Socorro City Council
Socorro Electric Cooperative
Socorro Soil and Water Conservation District
State Representative Don Tripp
U.S. Army Fort Bliss
U.S. Fish and Wildlife Service – Bosque del Apache National Wildlife Refuge (NWR)
U.S. Forest Service – Cibola National Forest
U.S. Forest Service – Southwestern Regional Office
U.S. Naval Research Laboratory
WSMR

On April 29, 2010, the following agency and organization representatives met with the BLM to discuss the study area expansion prior to the commencement of the public scoping meeting in Tucson, Arizona:

Arizona Army Air National Guard (AANG)
Arizona Game and Fish Department (AZGFD)
Arizona State Land Department
National Park Service – Saguaro National Park
Tohono O'odham Nation – San Xavier District
Tucson Electric Power
U.S. Air Force – Davis Monthan AFB
U.S. Air Force – Western Regional Office
U.S. Army – Western Regional Office
U.S. Army Fort Huachuca
U.S. Fish and Wildlife Service
U.S. Navy – Southwest Regional Office

3.3. Next Steps

The results of the April 2010 scoping report along with this addendum will provide input to determine the range of project alternatives that will be analyzed in the Draft EIS. When the Draft EIS is available for public review, the BLM will issue a Notice of Availability (NOA). The NOA will initiate a 90-day comment period. The BLM will hold a public hearing(s) on the Draft EIS, if there is either (a) substantial environmental controversy concerning the proposed action, (b) substantial interest in holding a public hearing, or (c) a request for a hearing by another federal agency with jurisdiction over the proposed action. Following the 90-day comment period for the circulation of the Draft EIS, the BLM will review the comments received, respond to any substantive comments (individually or collectively), and publish the Final EIS (incorporating responses to comments.) An NOA will be issued by the BLM in the *Federal Register* announcing the availability of the Final EIS. The Final EIS will circulate for 30 days prior to the BLM making a decision on the proposed project. Following this 30-day period, and upon determining that the Final EIS meets the standards for EIS adequacy, the BLM and any cooperating agencies may adopt the EIS. Once adopted, a Record of Decision is issued that either approves or denies the proposed action.

This EIS process and its associated time frames for the SunZia Project are summarized in Figure 2.



Figure 2 EIS Process Timeline

4. COMMENTS RECEIVED AND ANALYSIS

Per CEQ NEPA regulations (1501.7), it is through the scoping process that the lead agency will (a) determine the scope and significant issues to be analyzed in depth in the EIS and (b) identify and eliminate from detailed study the issues that are not significant. This process will narrow the discussion of such issues to a brief presentation in the EIS as to why they will not have a significant effect on the human environment. In brief, the scoping comments must be reviewed to determine which issues are or are not significant in the context of NEPA and conducting an EIS.

All project comments have been reviewed. Comments identified for consideration in development of the EIS must relate to one of the following categories:

- Project purpose and need
- Alternative development – comments indicating another alternative should be evaluated
- Alternative description and mitigation measures – comments suggesting modifications to already defined alternatives to reduce or avoid potential impacts
- Effects analysis – comments specifying concerns over the effects on resources or suggesting effects to be considered and disclosed

4.1. Scoping Comments Submitted

The scoping comment period was held from March 31 through June 10, 2010. A total of 519 comments were submitted by agencies, organizations, and individuals. These comments are compiled in Appendices E and F.

4.2. Comments Submitted after Scoping Period

Several comments were submitted to the BLM after the scoping comment period. A total of 47 comments were received between June 11 and July 31, 2010, which are presented in Appendix G.

The BLM will continue to accept and review subsequent comments, but such comments will not be included in any scoping report documentation.

4.3. Comment Processing Methodology

All comments received during the final scoping period were entered and managed in a comment tracking database system. Each comment was entered into the database, reviewed for content, and then categorized by code (many comments received were included in more than one category). A list of these codes and their categories is presented in Table 5. Key issues per category are summarized in Section 4.5 – Summary of Comments.

Table 5 Categorization of Comments by Code

Code	Category	Code	Category
010.00	Purpose and Need	040.00	Land Use
020.00	Engineering/Design	041.00	Agency Land Management Plan
030.00	Corridor Alignment/Alternatives	042.00	Wilderness
031.00	Avoid/Concerns for Area	043.00	Grazing/Ranching
031.01	Eloy	044.00	Private Lands/Property Values
031.02	San Pedro River Valley	045.00	Access
031.03	Galiuro Wilderness	046.00	Military Considerations
031.04	Sunset Mountain	050.00	Scenic/Visual/Landscape Character
031.05	Sulphur Springs Valley	060.00	Recreation
031.06	Aravaipa/Klondyke	070.00	Biological Resources
031.07	Cluff Ranch	071.00	Waterfowl/Migratory Birds
031.08	Mount Graham/Safford	072.00	Other Wildlife
031.09	US 191 South of Safford	073.00	Aquatic
031.10	Deming	074.00	Vegetation/Grasslands
031.11	Bosque del Apache NWR/San Antonio	075.00	Invasive Species
031.12	Rio Grande Corridor	080.00	Water Resources
031.13	Tucson	090.00	Cultural Resources
031.14	Pantano Wash	100.00	Airspace
031.15	Davis Monthan AFB/AANG/Airport	110.00	Noise/Interference
031.16	Avra Valley	120.00	EMF/Electrical Effects
031.17	Indian Reservation (AZ)	130.00	Economics
031.18	Belen	140.00	Social Issues
031.19	Sevilleta NWR	150.00	Environmental Justice
032.00	Use Existing Linear Corridor	160.00	Other NEPA Issues
033.00	Modifications to Alignment	165.00	Extend Scoping Comment Period

4.4. Agency and Organization Comment Submittals

Agencies and organizations that provided comments are listed below.

Federal Agencies

- U.S. Army Fort Bliss
- U.S. Representative Harry Teague
- U.S. Department of the Interior
 - Bureau of Reclamation – Phoenix
 - National Park Service – Intermountain Region and Saguaro National Park
 - U.S. Fish and Wildlife Service – Region 2

State Agencies

- AZGFD
- New Mexico State Representative Don Tripp
- New Mexico Department of Game and Fish
- New Mexico Military Base Planning Commission

Local Agencies

- Cochise County District 3, Arizona
- Pima County, Arizona
- Redington Natural Resources Conservation District, Arizona
- City of Tucson, Arizona
- Tucson Airport Authority, Arizona
- Socorro County Administration, New Mexico
- Socorro County Commission, New Mexico

Organizations

- Anam, Inc.
- Apaches of Aravaipa Canyon
- Aravaipa Property Owners Association
- Arid Lands Resource Sciences
- Audubon New Mexico
- Cascabel Hermitage Association
- Cascabel Working Group
- Center for Desert Archaeology
- Coalition for Sonoran Desert Protection
- Community Watershed Alliance
- Electric Pipeline Corporation
- Empire-Fagan Coalition
- Eureka Springs Property Owners Association
- Freeport Sierrita, Inc.
- Friends of Bosque del Apache NWR
- Friends of Saguaro National Park
- Geo-Marine, Inc.
- Hiking Club
- J-6/Mescal Community Development Organization
- Lennar Corporation – Tucson Land Division
- Mesilla Valley Audubon Society
- National Parks Conservation Association – Southwest Regional Office
- NM Solar Station, LLC
- NM Wildlife Federation
- Rio Grande Agricultural Land Trust
- Saguaro Juniper Corporation
- Sangre de Cristo Audubon Society
- Sierra Club – Grand Canyon Chapter
- Southern AZ Hiking Club – Cochise Trails Association

- The American Consumer Institute
- The Nature Conservancy
- The Wilderness Society
- Tiede’s Line Construction
- Tierra Grande Improvement Association, Inc.
- Willow Springs Ranch Phase I Owners Association, Inc.
- Windmill Ranches HOA

4.5. Summary of Comments

The sections below provide a general summary of the public scoping comments received. The issues listed herein are main points distilled from all comments received and summarized by category.

An expanded version of the comments arranged by category is provided in Appendix E. This accounting of comments was excerpted directly from written comments, with only minor edits for grammatical and/or clarification purposes. Duplicate comments per issue category are not included.

Appendix F presents each comment in its entirety as submitted.

4.5.1. **Proponent’s Purpose and Need (Code 010.00)**

Per Section 1502.13 of CEQ NEPA regulations, the EIS must explain “the underlying purpose and need to which the [lead] agency is responding in proposing the alternatives, including the proposed action.”

- The proposed project is necessary in the shift to renewable energy resource generation
- Alternative energy is necessary to develop national energy independence
- Renewable energy development and transmission should be balanced with local environmental values
- Energy production should be accomplished locally and not transported over great distances
- Each state should provide for its own renewable energy generation and bear the associated environmental burden

4.5.2. **Engineering/Design (Code 020.00)**

- Line burial would protect all concerned wildlife and prevent visual impacts
- Concern for safety where transmission line siting is in the vicinity of existing pipelines

- Coordinate with local utility providers to minimize the need for new transmission line corridors
- Design and construction of transmission line structures should be done in a manner limiting potential avian impacts – install bird diverter devices and lighting, no use of guy lines, bury transmission lines
- Consider using alternative technologies to reduce right-of-way requirements and visual impacts
- Consider placement by helicopter of transmission line structures to minimize new access road construction
- Include a detailed Construction, Operations, and Maintenance Plan in the Draft EIS

4.5.3. Corridor Alignment/Alternatives (Code 030.00)

- The expanded study area in New Mexico does not present alternatives that alleviate potential impacts to the migratory flyway along the Rio Grande corridor
- General preference by Windmill Ranch property owners for Alternative Routes E10 and E80 for the SunZia proposed transmission lines; general objection to routes D10 and A30

Avoid/Concerns for Area (Code 031.00)

- Support by Windmill Ranch (Lincoln County, New Mexico) for “E” alternative routes but opposition to “D” routes
- Concerns for “E” alternative routes within the New Mexico expanded study area by local residents (e.g., Mountainair, Deer Valley Preserve, Polvadera)
- Concern for “A” alternative routes north of WSMR by Sorocco County, New Mexico landowners and military
- Concern by Willow Springs Ranch landowners (Pinal County, Arizona) for “C” alternative routes
- Concern for “F” alternative routes in vicinity of Empire-Fagan Valley, Arizona
- Concern for “F” alternative routes along Interstate 10 by area residents (i.e., Benson, J-6/Mescal)

Avoid/Concerns for Area – Eloy (Code 031.01)

- Place lines along Interstate 10 to avoid impacts to development, archaeological, and visual resources

Avoid/Concerns for Area – San Pedro River Valley (Code 031.02)

- Avoid Cascabel and San Pedro River Valley area to avoid impacts to Arizona's only free-flowing river and its ecosystem and listed endangered species habitat
- Concern for impacts to conservation properties managed by one or more of the following: The Nature Conservancy, BLM, AZGFD, Redington Natural Resources Conservation District
- Some landowners have existing conservation easements
- The San Pedro River Valley has been identified as a wildlife corridor
- Project access and maintenance roads will create opportunities for off-roaders to cause ecological harm
- Concern for cultural resources along the river

Avoid/Concerns for Area – Galiuro Wilderness (Code 031.03)

- The area should remain roadless

Avoid/Concerns for Area – Sunset Mountain (Code 031.04)

No comments submitted.

Avoid/Concerns for Area – Sulphur Springs Valley (Code 031.05)

- Route would impact wildlife and habitat
- Project could spur future development

Avoid/Concerns for Area – Aravaipa/Klondyke (Code 031.06)

- Access created by construction of project maintenance roads will result in harm to wildlife, the propagation of invasive species, and will encourage roads and/or unauthorized roads over state trust and federal national forest lands
- Project would cross the Aravaipa Creek watershed for much of its length, potentially destroying and altering habitat important to native species
- Project would damage numerous archaeological and historical sites, including the Camp Grant Massacre site
- Use existing power line corridors to avoid Aravaipa Valley and Klondyke

Avoid/Concerns for Area – Cluff Ranch (Code 031.07)

- Modify route to avoid the AZGFD's Cluff Ranch Wildlife Area

Avoid/Concerns for Area – Mt. Graham/Safford (Code 031.08)

- Undeveloped lands should not be sacrificed for the project

Avoid/Concerns for Area – U.S. 191 South of Safford (Code 031.09)

No comments submitted.

Avoid/Concerns for Area – Deming (Code 031.10)

No comments submitted.

Avoid/Concerns for Area – Bosque del Apache NWR/San Antonio
(Code 031.11)

- Avoid the Bosque del Apache NWR due to impacts to migratory birds and special status species, or bury the line there
- Establishing transmission lines in this area would create a visual blight, thereby, adversely impacting tourism and, thus, the economy
- Avoid the Bosque del Apache NWR by placing the transmission line along one of the WSMR borders
- The transmission lines will hurt property values

Avoid/Concerns for Area – Rio Grande Corridor (Code 031.12)

- Conservation easements along the Rio Grande need to be protected
- Consider an alternative river crossing southeast of Hatch, New Mexico, where the crossing is short and is absent agricultural fields – there should be minimal use of the river in this area by migratory birds
- Avoid the Rio Grande corridor and riparian habitats by placing the transmission line along one of the WSMR borders
- The Middle Rio Grande Valley is a rural area that is, as yet, unmarred by massive power lines

Avoid/Concerns for Area – Tucson (Code 031.13)

- An alternative route through Tucson may result in impacts to the viewshed and wilderness character of Saguaro National Park
- Concern for aesthetic impact of transmission lines to downtown Tucson economic development and revitalization efforts
- General support by San Pedro River Valley conservationists to site a transmission line route along the Interstate 10 corridor through Tucson

- Concerns for transmission line impacts to cultural resources, county parks and recreation, conservation lands, and riparian habitat along Tucson waterways (e.g., Santa Cruz River, Pantano Wash, Rillito River)

Avoid/Concerns for Area – Pantano Wash (Code 031.14)

- Concern for transmission line impacts to riparian habitat along Tucson waterways (i.e., Rillito River, Pantano Wash, and downstream Cienega Creek)

Avoid/Concerns for Area – Davis Monthan AFB/AANG/Airport (Code 031.15)

- Alternative routes that roughly parallel both the north and south sides of Interstate 10 potentially conflict with Davis-Monthan flight patterns
- Concerning Tucson International Airport and Ryan Field, no route should be located within a 10,000-foot buffer area (as measured from the end of runways at each airport)

Avoid/Concerns for Area – Avra Valley (Code 031.16)

- Tucson Mitigation Corridor prohibits transmission line(s) siting along CAP canal
- Concern for visual impacts on Picture Rocks community, Saguaro National Park, Tucson Mountain Park, Arizona Sonoran Desert Museum
- Concern for potential impacts to wildlife corridor/biological connectivity

Avoid/Concerns for Area – Indian Reservation-AZ (Code 031.17)

- Consider approaching Tohono O’odham Nation for transmission line access across reservation property

Avoid/Concerns for Area – Belen (Code 031.18)

- A transmission line route in the vicinity of Belen (north of the originally proposed study area) does not eliminate potential impacts to migratory birds along the Rio Grande and, hence, potential impacts to ecotourism
- Concern for viewshed and dark sky impacts to area residents

Avoid/Concerns for Area – Sevilleta NWR (Code 031.19)

- A transmission line route in the vicinity of Sevilleta NWR (north of the Bosque del Apache NWR) does not eliminate potential impacts to migratory birds along the Rio Grande
- A transmission line crossing of the Rio Grande near the refuge should be buried
- Concern for changes to Sevilleta NWR land use conditions as a result of nearby transmission line construction that would affect the refuge’s deed/ownership

Use Existing Linear Corridor (Code 032.00)

- The Interstate 10 corridor in Arizona should not be considered for the siting of transmission lines due to impacts on adjacent communities (e.g., Vail, Benson, J-6, Mescal, Skyline communities)
- New power transmission corridors should be placed along already established rail and highway corridors (specifically Interstate 10) to avoid impacts to the San Pedro River Valley
- Suggest using existing corridors to avoid impacts to Avra Valley, the Tucson Mitigation Corridor, and recharge ponds west of Tucson
- Suggest using existing corridors as much as possible to minimize disturbance to more pristine areas and biological resources

Modifications to Alignment (Code 033.00)

- Consider possible overhead Rio Grande crossing at a location approximately 14 to 15 miles southeast of Hatch, New Mexico where the river is in a narrow canyon with no agriculture
- Appreciation for modifying alternative route A20 around Windmill Ranches (326 lots) to avoid dissecting the development as previously proposed; encourage consideration for route E10 or E80, not D10

4.5.4. Land Use (Code 040.00)

- The Rio Grande Agricultural Land Trust holds conservation easements on approximately 400 acres of farmland and riparian habitat in the middle Rio Grande
- The route should avoid all wildlife refuges, wilderness areas, wilderness study areas, and areas of critical environmental concern
- It is unsound practice to create new corridors of development when existing routes will accommodate added infrastructure
- Siting the transmission lines on BLM and other public lands would impact the fewest people
- People residing in small communities would have to unfairly share a burden of living under or near large power lines, mostly for distant cities

Agency Land Management Plan (Code 041.00)

- The BLM is mandated to protect threatened and endangered species and their associated ecosystems (habitats). The Safford District Resource Management Plan designated the

16,763-acre Hot Springs Watershed Area of Critical Environmental Concern for the protection of riparian, cultural, and fish and wildlife values including threatened and endangered species values

Wilderness (Code 042.00)

- Arizona's wilderness areas [Aravaipa and San Pedro River Valley] should not be sacrificed in order to provide an energy source for other states
- Concern for siting transmission lines adjacent to national parks and wilderness study areas, thereby, resulting in potential significant impacts to viewsheds and wilderness character

Grazing and Ranching (Code 043.00)

- Concern for interference to ranching operations and lifestyle from transmission lines
- Efforts to preserve critical farmlands could be negatively affected by the siting of transmission lines in the Middle Rio Grande corridor

Private Lands/Property Values (Code 044.00)

- A decline in private property values could result from the construction of transmission lines

Access (Code 045.00)

- Transmission lines and their associated construction and maintenance roads will cause landscape and habitat fragmentation
- Creating new access will invite unauthorized off-road vehicle traffic, thus, leading to soil erosion, water quality impacts, and noise pollution
- Vehicular access to transmission line corridors can facilitate the spread of invasive plant species

Military Considerations (Code 046.00)

- Citizen concern for impacts to Department of Defense (DOD) airspace operations, optic testing, and other military missions
- DOD coordination is encouraged to determine a route that simultaneously avoids the migratory flyway and provides appropriate mitigation to protect the military mission(s)

- The expanded study area in New Mexico does not address the impacts to the migratory flyway along the Rio Grande, therefore, the transmission line corridor should:
 - Go through WSMR
 - Go south around WSMR
 - Go along the western border of WSMR
- Private land owners and grazing leaseholders fear the loss of annual compensation from the DOD for the right to use the airspace over ranches and residences if construction of transmission lines were to prohibit low-level airspace military operations
- The northern most alternative route in New Mexico would minimize encroachment on military testing and training, a vital component of the economy to local communities
- The addition of 500kV transmission lines in the Arizona expanded study area could interfere with Fort Huachuca’s Electronic Proving Ground testing

4.5.5. Scenic/Visual/Landscape Character (Code 050.00)

- Transmission wires and towers will ruin the viewscape for residents
- A marred viewscape will negatively impact ecotourism which is dependent upon a pristine landscape
- New transmission lines could negatively impact visitors’ viewsheds from national parks and monuments
- The power lines should not impinge on Native American sites and dark skies for astronomy
- Line burial should be considered as mitigation of visual impacts

4.5.6. Recreation (Code 060.00)

- Horseback riders, hikers, bicyclists, motorcyclists, and campers would be adversely affected by these proposed lines
- Transmission lines could result in recreational impacts to trails, scenic loops, and bird viewing/photography platforms

4.5.7. Biological Resources (Code 070.00)

- The proposed and alternative routes would negatively affect wildlife corridors and increase habitat fragmentation

Waterfowl/Migratory Birds (Code 071.00)

- Any crossing of the Rio Grande corridor must be underground to preserve the integrity of the daily flight paths of Sandhill Cranes and other migratory birds
- Transmission lines would negatively impact the San Pedro River Valley – the main migratory corridor for neo-tropical birds in the West
- Where the SunZia line eventually crosses the Rio Grande, mitigation measures must be put in place that include avoidance of critical wetlands, riparian areas, and agricultural fields used for foraging

Other Wildlife (Code 072.00)

- Human activity and habitat modification associated with the transmission lines in Aravaipa would greatly impact this unique bighorn sheep population
- The lower San Pedro River Valley is a rich Sonoran Desert ecosystem with desert tortoises, bighorn sheep, raptors, and a variety of other wildlife that would be impacted by the project
- The potential routes that run south and west of Tucson may affect the federally endangered Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*) and, in areas containing saguaro cactus, lesser long-nosed bats
- Project needs to avoid the wildlife migration corridor, including the Central Arizona Project's Tucson Mitigation Corridor, west of Tucson Mountain Park

Aquatic (Code 073.00)

- Aravaipa Creek currently supports seven species of native fishes, four of which are federally listed as threatened or endangered
- The Pantano Wash-Rillito River alternative route could have appreciable impacts to aquatic resources, the federally endangered Gila chub, Gila topminnow, and Huachuca water umbel
- Concern for the project to potentially affect the federally listed Silvery Minnow in the Rio Grande River

Vegetation/Grasslands (Code 074.00)

- Disturbed areas should be reseeded with vegetation native to the site, utilizing seed collected from the project area to maintain the genetic integrity
- Concern that the Avra Valley alternative route would potentially impact large acreages of endangered Pima pineapple cactus habitat during project construction and operation

- Unauthorized off-road vehicle travel would damage native vegetation due to new access roads

Invasive Species (Code 075.00)

- New access roads would introduce non-native and invasive species

4.5.8. Cultural Resources (Code 080.00)

- Alternate routes within the New Mexico expanded study area would cross several Native American and non-native archaeological sites
- Transmission line siting should avoid the Camp Grant Massacre site in the Aravaipa area
- An Avra Valley/Altar Valley alternative route in Arizona would cross an archaeologically dense area, including Pima County-identified Priority Archaeological Site Complexes
- Transmission line access roads would lead to the looting and vandalism of archaeological resources

4.5.9. Water Resources (Code 090.00)

- Erosion caused from tower construction would increase sedimentation of rivers, negatively impacting water quality
- Construction of the lines in mountainous areas could affect stream flow and watersheds and associated habitat
- Indirect impacts via sedimentation and elevated peak flows on water resources should be addressed in the EIS
- Intermittent streams in the San Pedro River Valley should be addressed
- Transmission line siting should avoid Cienega Creek due to its habitat, water resource, and flood control values

4.5.10. Airspace (Code 100.00)

- Transmission line siting in the Tucson area must not interfere with flight operations at the Tucson International Airport and Ryan Field
- It seems contradictory to place an electric power line through airspaces that would be at risk of interruption by the army's activities, when residents are required by contract to evacuate their homes for these same activities

- Concern for impacts to airstrip in Willow Springs Ranch housing development in Pinal County, Arizona

4.5.11. Noise/Interference (Code 110.00)

- Nuisance of noise from transmission lines would interfere with rural solitude and be a deterrent to prospective buyers
- Concern for interference with A.M. radio reception
- Consider the cumulative noise pollution impact from the extra high voltage conductors, particularly when wet

4.5.12. Electric and Magnetic Fields/Electrical Effects (Code 120.00)

- Concern for EMF effects on the health and reproduction of people and livestock
- Safety concern posed by EMFs on nearby pipelines, especially during repair work utilizing welders and torches

4.5.13. Economics (Code 130.00)

- The proposed project will provide access to stranded renewable resources which will help diversify New Mexico's economy by promoting needed renewable energy development
- The ecotourism industry in/along the Rio Grande, the Aravaipa Valley, San Pedro River Valley, and Avra Valley will suffer if transmission lines are constructed in these areas
- Concern that the project will put at risk the local military-driven economy in New Mexico
- Concern that the project originating in and focusing on wind energy in New Mexico could be a detriment to Arizona's emerging solar industry

4.5.14. Social Issues (Code 140.00)

- Concern that the transmission line corridor will provide access to illegal aliens from Mexico, thus spurring crime
- Concern that new high voltage transmission lines would be a target by foreign or domestic terrorists, thus creating a safety risk for nearby residents

4.5.15. Environmental Justice (Code 150.00)

- Concern for impacts to low income, elderly, and Native American populations along the Avra Valley transmission line alternative

4.5.16. Other National Environmental Policy Act Issues (Code 160.00)

- The EIS needs to take into account cumulative and indirect impacts
- The project must address mitigation for unavoidable impacts
- Concern for the general health and safety of residents, ranchers, livestock, and wildlife
- Construction of new transmission corridors in undeveloped areas will only open up the areas for additional development [cumulative/indirect impacts]
- New maintenance roads will encourage the use of off-road traffic potentially resulting in noise pollution, soil erosion, and vegetation impacts
- Project construction traffic will damage vegetation and could temporarily halt grazing operations [temporary impacts]
- Soil erosion and sedimentation would accompany construction and operation of transmission lines
- Concern for impacts to geologic formations in the San Pedro River Valley

4.5.17. Extend the Scoping Comment Period (Code 165.00)

- Extend the scoping period for the expanded study area beyond June 10, 2010, to allow more time for commenting

5. ISSUES THAT WILL BE ADDRESSED

The public scoping process identified numerous issues to be addressed in the project EIS. The issues summarized in Section 4.5 and Appendix E will be addressed within one of the following major elements of the Draft EIS:

- Purpose and need
- Project description and alternative technologies
- Transmission line routes alternatives
- Resource inventory, impacts, and mitigation

The discussion that follows in this addendum largely mirrors that contained within the initial scoping report. This is attributed to the following:

- Parties submitted comments during multiple scoping periods that were consistent in their message
- New comments were received during the latest scoping period that highlighted issues within the initial study area which were consistent with previous comments
- New comments were received during the latest scoping period pertaining to issues within the expanded study area, but similar in content to previous comments

Three comments were received requesting an extension to the comment period (issue category 165.00 Extend the Scoping Comment Period.) The BLM considered these requests and determined that the formal 45-day scoping comment period provided sufficient opportunity for the public and organizations to address their concerns relating to the purpose and need, project description, alternative technologies, proposed and alternative transmission line routing, and resource evaluation, impacts, and mitigation.¹ It should be noted that the BLM is accepting comments for consideration beyond the 45-day scoping comment period. However, such “late” comments will not be incorporated into a formal report.

5.1. Purpose and Need

An EIS must explain the “underlying purpose and need to which the [lead] Agency is responding in proposing the alternatives, including the proposed actions” (40 Code of Federal Regulations [CFR] 1502.13). The statement of the purpose and need explains why the federal agency and the project Proponent are undertaking the proposed action and what objectives are to be achieved by that action. Alternatives need not be considered that do not achieve the purpose and need.

The purpose and need for the SunZia Project will address why the project is being proposed (documented need for renewable energy transmission between New Mexico and Arizona) and what it expects to achieve (providing renewable energy resource transmission to meet states’ Renewable Portfolio Standards, enhance domestic energy security, etc.)

¹ The CEQ NEPA regulations and the BLM NEPA handbook do not stipulate the duration of a scoping comment period. The BLM typically observes a scoping comment period of 30 days.

5.2. Project Description and Alternative Technologies

Concerns relating to high voltage transmission technology and the physical requirements for transmission line construction, maintenance, and operation thereof will be addressed in the EIS project description. Included in this element will be a discussion regarding transmission line burial and/or Superconductor technologies. Technical feasibility and constructability of the proposed project and alternative technologies will also be introduced in this EIS element.

Alternatives that do not meet the project's purpose and need, or are not reasonable and feasible, will not be evaluated within the scope of the EIS.

5.3. Transmission Line Route Alternatives

Numerous comments were received requesting additional alternatives to be considered. NEPA requires a "range of alternatives" to be discussed in environmental documents. The range is to include all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives which are eliminated from detailed study with a brief discussion of the reasons for eliminating them. According to CEQ guidance memo *NEPA's Forty Most Asked Questions*, reasonable alternatives "include those that are practical or feasible from the technical and economic standpoint and using common sense."²

As discussed in Section 2 of this scoping report addendum, the potential range of alternatives was expanded to include additional areas in both New Mexico and Arizona. This was a direct result of previous scoping conducted throughout much of 2009 by the BLM with the public and agencies.

As stated in the initial scoping report, siting of the proposed and alternative routes continue to be refined through initial and ongoing meetings with BLM resource specialists, cooperating and other agency staff, organizations and individuals with pertinent resource data. Therefore, transmission line *segments* may be added, deleted, or modified to address resource and engineering concerns. Substantial focus will be given to alternative siting in the sensitive areas in the vicinity of: Eloy, San Pedro River Valley, Tucson-metropolitan area and vicinity, Sulphur Springs Valley, Aravaipa/Klondyke, Mount Graham/Safford, Deming, Bosque del Apache and Sevilleta NWRs, Rio Grande corridor, Windmill Ranches, and WSMR.

Where reasonable and feasible, routing will be located using existing linear features, such as established utility (transmission and pipeline) and transportation (freeway and railroad) corridors.

In addition to documentation in the Draft EIS, alternatives both (a) carried forward into the EIS for further evaluation and (b) identified but eliminated from further consideration will also be identified and documented in a feasibility siting study published as part of the Draft EIS.

² NEPA's Implementing Regulations at 40 CFR 1500 – 1508. Printed in: *Federal Register* Vol. 46, No. 55, 18026-18038, 3/23/81

5.4. Resource Inventory, Impacts, and Mitigation

A large volume of scoping comments concern the environmental resources within the study area, especially relating to migratory birds, listed species, habitat fragmentation, preservation of wilderness and wilderness-like areas, cultural resources, aesthetics, private property/property values, and local economies. Although these key issues were frequently cited in the scoping comments, all resources relating to the natural, human, and cultural environment will be addressed in the EIS.

First to be addressed is the identification of the environmental resources, or resource inventory. Scoping comments received that identified specific resources potentially affected by the proposed project merit further investigation. GIS data will be requested, if needed, and the inventory for each resource will be documented in the Draft EIS. GIS data coordination with the military, The Nature Conservancy, various conservation districts and land trusts, and county agencies, for example, has been undertaken as a result of scoping.

Due to the significance of the Rio Grande on migratory birds in New Mexico, as identified through the scoping process, a special avian study in support of the EIS has been initiated. Further, other biological surveys, breeding season issues, and permits will be addressed in the biological resources section of the EIS. Any biological impacts and mitigation, in coordination with state and federal resource agencies, will be detailed in the EIS.

Inventories, impacts, and mitigation to cultural resources will be addressed in the EIS. To this end, BLM consultation with state cultural resource agencies and Native American tribes was initiated during project scoping. Section 106 consultation pursuant to the National Historic Preservation Act will be ongoing throughout the EIS process.

Regardless of the specific resource(s) identified in any specific scoping comment, the issue of cumulative impacts as a result of the proposed project was reiterated. Pursuant to NEPA, all resource impacts – direct, indirect, and cumulative – will be addressed in the resource sections of the Draft EIS. Any required mitigation will also be addressed in the EIS resource sections, as well.

6. ISSUES THAT WILL NOT BE ADDRESSED

Not all comments with issues received during the proposed project's scoping period will be addressed in the development of the project EIS. Such issues are those that fall outside of the scope of an EIS, or are otherwise not subject to environmental analysis. Pursuant to CEQ NEPA regulations, the scope of an EIS includes the extent of the action, the range of alternatives, and the types of impacts to be evaluated (40 CFR 1508.25). Thus, comments that are not focused on the purpose and need of the proposed action, proposed alternatives, assessment of the environmental impacts of those alternatives, and proposed mitigation are beyond the scope of the EIS.

The following out-of-scope comment (*italicized*) was received and will not be addressed in the EIS. The rationale for considering the comment out-of-scope is included.

- *Will there be a guarantee for restitution associated with future environmental and health issues? Will there be a guarantee to bare all legal expenses incurred to enforce restitution and liability? Will there be a clause to rectify any unforeseen future conflicts environmentally or health related?*

In addition, the following out-of-scope comments received during the scoping period of 2009 where listed in the April 2010 Scoping Report (Volume I).

- *Institution of a requirement for annual compliance reporting of verifiable renewable energy sources.*

The proposed project's purpose and need clarifies that renewable energy sources are the focus. Verification requirements, however, is not within the purview of the BLM and is not applicable to the BLM's decision to grant right-of-way for the project Applicant.

- *It would be better to strive to not build more power plants, and instead encourage less consumption (conservation). The replacement of electrical generation from fossil fuel sources with electrical generation from renewable sources in the Southwest [is favorable], but only if the large energy markets in this region are also subject to rigorous conservation standards [and] if [the project] is carried out in the context of rigorous residential and commercial energy conservation programs.*

Regional and national energy policy relating to conservation requirements are not within the purview of the project Applicant nor the BLM. The project proposal does not either support or negate the merit of energy conservation, a policy issue that is beyond the scope of this EIS.

- *What is needed is local-level power generation instead of interstate transmission; electrical power should be decentralized; energy production should be accomplished locally.*

As addressed in the proposed project's purpose and need, interstate transmission specifically between Arizona and New Mexico is a documented need. The Applicant's proposal is serving an unmet need. The project proposal does not either support or negate assertions

relating to local-level power generation or decentralization/centralization, which is beyond the scope of this EIS.

- *The project should provide a direct tie into small communities.*

The Applicant's purpose and need is to provide transmission capacity for primarily renewable energy sources to be delivered to utility companies. It is the role of utility companies (private or public) in the U.S. utility market to serve the end users in communities. Service to end-users (communities) is not part of the proposed project's purpose and need, and is thus outside the scope of this EIS.

- *Government money would be better invested in schools, etc.*

The proposed project has no government funding at this time. However, the issue of discretionary funding by governmental organizations is not within the purview of the BLM and is not applicable to the BLM's decision making concerning the Applicant's right-of-way grant application. Further, fiscal policy issues are not addressed within the NEPA regulations, and are thus out-of-scope for this EIS.

- *General for or against "vote" for the project.*

As noted in the CEQ *A Citizen's Guide to the NEPA*, "Commenting is not a form of "voting" on an alternative. The number of negative comments an agency receives does not prevent an action from moving forward. Numerous comments that repeat the same basic message of support or opposition will typically be responded to collectively. In addition, general comments that state an action will have "significant environmental effects" will not help an agency make a better decision unless the relevant causes and environmental effects are explained."³ This comment is not relevant within the context of NEPA analysis.

- *I wonder about our mental health if we live with and must always look at the "monster marchers" which carry high voltage. The "monsters" create a feeling of unease and perhaps even fear in some people.*

NEPA requires the analysis of a proposed project's effects on the quality of the human environment. Per NEPA guidelines, the human environment refers to the natural and physical environment and the relationship of people with that environment (40 CFR 1508.14.) Psychological effects are not considered to be within the realm of the physical environment under NEPA. Thus, mental health issues are outside the scope of the EIS.

- *I am extremely opposed to all of the proposed and alternative routes.*

A general sentiment concerning the proposed project does not lend itself to the analysis of the potential effects on the physical environment as required under NEPA. This comment is not within the scope of the EIS.

- *Concerned about AC, want DC transmission line.*

³ Council of Environmental Quality *A Citizen's Guide to the NEPA – Having Your Voice Heard*. December 2007. p. 27.

The project proposes either two AC transmission lines, or one AC and one DC transmission line. The EIS will provide an overview of these types of transmission. However, the general nature of this comment does not specify what the concern is and does not provide the necessary context needed to address any environmental issue.

- *There are too many transmission lines running across Highway 25 between San Antonio and the Rio Grande River.*

The general nature of this comment does not specify what the concern is and does not provide the necessary context needed to address any environmental issue. However, an impact analysis that addresses cumulative impacts of multiple transmission lines (new and existing) will be included in the EIS.

- *Transmission lines that will invade that environmentally sensitive pristine virgin land defeats the purpose of “clean energy.”*

The nature of this comment is subjective. Development of clean energy is a matter of national and international policy, the merits of which are not debatable under NEPA. However, the effects of a renewables energy project on the physical environment will be addressed in the EIS. Because a project may have significant environmental effects does not mean the project should or should not be approved under NEPA.

- *Many Corona, New Mexico ranchers are eager to lease their land for the project for the potential earnings.*

In general, land use will be addressed in the project EIS. However, the acquisition of specific privately owned right-of-way for the construction and operation of the proposed transmission line is an issue for the Applicant and not the BLM.

- *I am not in favor of the proposal for the New Mexico SunZia Project. Most especially, I am against the so called the Mason Draw solar field. The basis for my objection to the location of the field is that it will be destroying valuable grassland habitat.*

The Mason Draw solar field is an unaffiliated, unrelated project to the SunZia project, and is thus outside the scope of the SunZia EIS. The BLM’s decision on granting right-of-way for the proposed transmission line project is dependent upon the particulars of the SunZia EIS analyses, which will evaluate any impacts to grasslands within the project’s study area. As a matter of process, cumulative impacts to grasslands will be included.

- *This project lends itself to the perpetuation of centralized power grids which pose a threat to national security.*

The purpose and need of the proposed project is to provide transmission capacity of renewable energy sources in New Mexico and Arizona, thereby enhancing domestic energy security. The merits of centralized or decentralized renewable energy transmission is not subject to NEPA analysis, and is thus not relevant to the BLMs’ decision to grant right-of-way for the proposed project.

- *The SunZia Project should be buried.*

The project proponent is not considering burial of the transmission lines as an alternative. Excessive costs, technological and design issues, excessive ground disturbance, and operation and maintenance concerns are among the factors that would make undergrounding the entire project infeasible.

- *The SunZia Project should be buried at the Rio Grande River crossing.*

The Applicant is not proposing burial of the transmission lines as an alternative to overhead lines for crossing the Rio Grande River. However, in response to public comments, an evaluation of a buried crossing of the Rio Grande River near San Antonio, New Mexico is being conducted and will be included as part of the engineering and environmental analysis, in addition to the consideration of other potential mitigation measures for the river crossings.