

Proposed Southline Transmission Line Project Environmental Impact Statement

Scoping Summary

September 2012



Corrected Table 6 and Table 8.

This document contains the updated tables for the Southline Transmission Line Project EIS Scoping Summary. The change is due to a typographical error in the number totals identified within these tables. This document supersedes the August 2012 version.

Corrected information in Section 5 – Future Steps in the EIS Process.

This section was updated to remove specific dates from the future steps in the EIS process as these dates are subject to change and are represented in the project schedule as ranges in time.

**PROPOSED SOUTHLINE TRANSMISSION LINE PROJECT
ENVIRONMENTAL IMPACT STATEMENT**

SCOPING SUMMARY

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¹ Appendices with public information and meeting materials are not included in this document.

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1.0 INTRODUCTION

Southline Transmission, LLC (Southline), applied to the Bureau of Land Management (BLM) for a right-of-way (ROW) on public land to construct a high-voltage electric transmission line and associated facilities in southern New Mexico and southern Arizona. The proposed Southline Transmission Line Project (Project) would consist of a “New Build” Section and an “Upgrade” Section. The New Build Section would involve the construction of approximately 240 miles of new 345-kilovolt (kV) double-circuit electric transmission line in New Mexico and Arizona. The New Build Section would connect the existing Afton substation south of Las Cruces, New Mexico, to the existing Apache substation south of Willcox, Arizona. The Upgrade Section would involve rebuilding approximately 120 miles of existing 115-kV transmission lines to 230-kV lines in Arizona between the Apache and Saguaro Substations in Arizona. The Upgrade Section would be located in existing ROW administered by Western Area Power Administration (Western). Approximately one-third of the Project would cross public lands administered by the BLM. The Project would also cross a small segment of land administered by the U.S. Forest Service, some privately owned lands, and some State-owned lands.

Consideration of this ROW application is a major Federal action requiring compliance with the National Environmental Policy Act (NEPA) of 1969. To comply with the requirements of NEPA, an environmental impact statement (EIS) is being prepared to disclose the potential environmental impacts associated with the Project’s construction and operation and to consider alternatives to Southline’s proposed action. This EIS process will inform the public and agencies about the potential impacts the Project may have on human and natural resources.

The BLM New Mexico State Office and Western are joint lead agencies for the preparation of this EIS. Western is a power-marketing agency within the Department of Energy and is proposing to participate in the proposed Project with Southline. Participation will be determined through environmental, operational, and financial agreements that would define the respective rights and obligations of the parties as well as the ownership of the transmission capacity associated with the Project.

1.1 Background Information

A notice of intent (NOI) to prepare the EIS was published in the Federal Register on April 4, 2012. Posting of the NOI initiated a 60-day public and agency scoping period, during which the public has the opportunity to provide input on potential issues to be addressed in the EIS (an extension of this scoping period is discussed in Section 1.1.1, “Scoping Extension,” below). The BLM and Western held two agency scoping meetings for the EIS (one in Las Cruces, New Mexico, and one in Tucson, Arizona) and six public meetings (three in New Mexico [Las Cruces, Deming and Lordsburg] and three in Arizona [Willcox, Benson, and Tucson]) (Table 1, Figure 1).

These meetings served to provide information on project planning activities to date and to give agency personnel and members of the public the opportunity to ask questions or make comments. Presentations were given at each meeting by the BLM National Project Manager, Tom Hurshman, and a representative of the project proponent, Doug Patterson. Western staff members were also available at the meetings for questions, as were staff members from BLM’s Las Cruces, Safford, and Tucson Field Offices and staff members from Southline. Meeting attendees were encouraged to ask questions and were allowed to provide oral comments after the presentation. However, BLM asked attendees to submit their comments in writing, as no court reporter was present and the meetings were not recorded.

Table 1. Agency and Public Scoping Meetings

Date	Time	City, State	Address	Number of Attendees
Agency Scoping Meetings				
May 8, 2012	10:00 am	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	18
May 17, 2012	10:00 am	Tucson, Arizona	National Advanced Fire and Resource Institute 3265 East Universal Way	24
Public Scoping Meetings				
May 8, 2012	5:30 pm	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	22
May 9, 2012	5:30 pm	Deming, New Mexico	Mimbres Valley Special Events Center 2300 East Pine Street	30
May 10, 2012	5:30 pm	Lordsburg, New Mexico	Dugan-Tarango Middle School 1352 Hardin	20
May 15, 2012	5:30 pm	Willcox, Arizona	Quality Inn 1100 West Rex Allen Drive	20
May 16, 2012	5:30pm	Benson, Arizona	Benson Unified High School 360 South Patagonia Street	22
May 17, 2012	5:30pm	Tucson, Arizona	Palo Verde High Magnet School 1302 South Avenida Vega	31

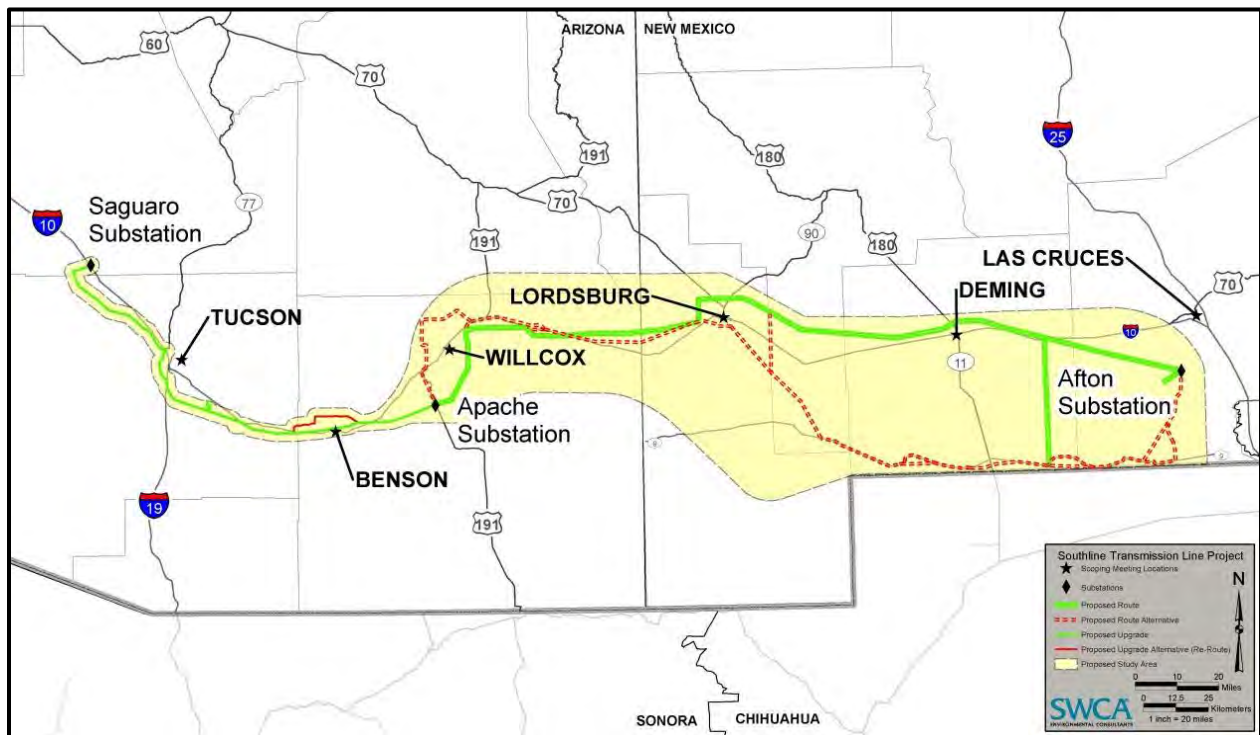


Figure 1. Locations of scoping meetings held in May 2012.

1.1.1 Scoping Extension

As a result of public requests for an extension of the 60-day scoping comment period (ending on June 5, 2012), the scoping comment period was extended by 30 days (ending on July 5, 2012). Notification of the 30-day extension was disseminated via Internet news release and email. The comments received during the 90-day scoping period will become part of the administrative record and will be included in the EIS analysis.

1.2 Proponent Stakeholder Outreach

Though not required as part of the NEPA process, Southline conducted a series of pre-scoping meetings and workshops in September 2011. The meeting goals were to give the public early notification and begin to work with interested stakeholders on routing options. Southline hosted public meetings in Deming and Lordsburg, New Mexico (September 21–22); in Willcox, Tucson, and Marana, Arizona (September 27–29); and in Benson, Arizona (November 10). Routing workshops were hosted in Deming, New Mexico (September 22), and Tucson, Arizona (September 28).

Southline also participated in meetings with county commissioners and supervisors from Hidalgo County in New Mexico and Cochise and Pima Counties in Arizona. In addition, Southline participated in a meeting with a council member from Tucson, Ward 1, in September 2011.

Although these meetings are not part of the formal NEPA process, they helped to identify stakeholder issues, potential alternatives, and analysis methodology efforts. These meetings also resulted in the collection of vital information important to the proposed project proponent, the agencies, and the NEPA process. Southline used information from their stakeholder outreach to develop their proposed project description (proposed action) and an alternative route. This information was submitted to BLM and Western in the format of a Routing Report and modification to the project Plan of Development.

2.0 SCOPING PROCESS

The purpose of scoping is to provide an opportunity for members of the public to learn about the proposed project and to share any concerns, pertinent information, or comments they may have. Input from the public scoping process is used to help the BLM and Western identify issues and concerns to be considered in the EIS, as well as identify potential alternatives. In addition, the scoping process helps identify any issues that are not considered relevant and can therefore be eliminated from detailed analysis in the EIS. The list of stakeholders and other interested parties is also updated and generally expanded during the scoping process.

This scoping summary is intended to outline the efforts taken by the BLM and Western to solicit feedback from the public, as well as aid in clarifying preliminary issues, concerns, and opportunities, determining the appropriate scope of environmental analysis, and gathering input on alternatives development from comments received. The document summarizes public and agency comments received during the scoping period, describes the analysis of those comments, and provides a preliminary list of issues, concerns, and opportunities for analysis in the EIS. All substantive issues raised by respondents within the scope of the BLM's and Western's decisions will be included in the EIS, as will other resource categories and issues that are required by BLM or Western but that were not mentioned specifically by respondents.

As described in Section 1.1 of this document, the scoping process used for this EIS was initiated by publication of an NOI in the Federal Register on April 4, 2012.

2.1 Advertising of Public Meetings

The scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates (Tables 2–4). In each format, the advertisements provided public meeting logistics, explained the purpose of the public meetings, gave the schedule for the public scoping comment period, outlined additional ways to comment, and provided methods for obtaining more project information.

Table 2. Meeting Notification Methods and Dates

Publicity Item	Venue and Date
Notice of Intent	Federal Register – April 4, 2012
Newspaper Ads	<i>Las Cruces Sun-News</i> – April 20 and May 4, 2012 <i>The Deming Headlight</i> – April 20 and 27, 2012 <i>Hidalgo County Herald</i> – April 19 and May 3, 2012 <i>San Pedro Valley News-Sun</i> – April 19 and May 3, 2012 <i>Arizona Daily Star</i> – April 20 and May 7, 2012 <i>Arizona Range News</i> – April 25 and May 2, 2012 <i>The Eastern Arizona Courier</i> – April 29 and May 9, 2012 <i>The Explorer</i> – May 9, 2012
Email Distribution	Email to BLM Stakeholder List – April 27, 2012 – Agency and public scoping notification (603 recipients) June 4, 2012 – Notification of extended comment period (790 recipients) June 28, 2012 – Notification of scoping comment period end date (788 recipients)
Postcard Distribution	U.S. Postal Service (Public and agency recipients) – April 23, 2012 – Agency and public postcard notice (626 recipients) April 25, 2012 – Agency and public postcard notice (64 recipients) May 1, 2012 – Notification to permittees (206 recipients)
BLM Web Site	http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html Posting of the meetings at least 15 days prior to the meetings

Table 3. News Release Media Distribution

New Mexico Media Outlet	Arizona Media Outlet
<i>Las Cruces Sun-News</i> (Las Cruces)	<i>San Pedro Valley News-Sun</i> (Benson, St. David, Pomerene, Cascabel, Mescal, J-Six, Dragoon)
<i>The Deming Headlight</i> (Luna County, Deming)	<i>Arizona Daily Star</i> (Tucson and southern Arizona)
<i>Hidalgo County Herald</i> (Hidalgo County, Lordsburg)	<i>Arizona Range News</i> (Willcox, Sunsites, San Simon, Bowie, Cochise, Dragoon)
	<i>The Eastern Arizona Courier</i> (Safford area)
	<i>The Explorer</i> (Marana, Oro Valley, Northwest Tucson)

Table 4. Newspaper Advertisements

Publication Date	Newspaper
April 19, 2012	<i>Hidalgo County Herald</i>
April 20, 2012	<i>Las Cruces Sun-News</i> <i>The Deming Headlight</i> <i>Arizona Daily Star</i>
April 25, 2012	<i>Arizona Range News</i> <i>San Pedro Valley News-Sun</i>
April 27, 2012	<i>The Deming Headlight</i>
April 29, 2012	<i>The Eastern Arizona Courier</i>

Table 4. Newspaper Advertisements (Continued)

Publication Date	Newspaper
May 2, 2012	<i>Arizona Range News</i>
May 3, 2012	<i>Hidalgo County Herald</i>
May 4, 2012	<i>Las Cruces Sun-News</i>
May 7, 2012	<i>Arizona Daily Star</i>
May 9, 2012	<i>San Pedro Valley News-Sun</i> <i>The Eastern Arizona Courier</i> <i>The Explorer</i>

2.2 Meeting Setup

The BLM and Western hosted six public scoping meetings and two agency scoping meetings for the proposed Project (see Table 4). The meetings were conducted in an open house format with a PowerPoint presentation and question and answer period following the presentation.

The open house format and presentation were designed to allow attendees to view informational displays, hear a presentation of the Project and summary of the NEPA process, allow members of the public to ask agency staff about the proposed action and the EIS process, and submit written or verbal comments onsite.

Meeting attendees were asked to sign in upon entering, at which time they were provided with handouts and informed of the meeting format and how to comment at the meeting. The handouts (i.e., comment form, newsletter, and contact card) and informational displays provided information about the following:

- NEPA and the EIS process;
- Agency purpose and need;
- Project background;
- Location maps;
- Similarities and differences between the Southline and SunZia Southwest Transmission Project;
- Potentially affected resources and issues to be analyzed in the EIS; and
- How to provide comments to the BLM and Western.

Additionally, an interactive geographic information system (GIS) mapping station was available for meeting attendees to view the project area and provide comments about specific locations within the study area.

2.3 Opportunities for Public and Agency Comment

Members of the public and agencies had several methods for providing comments during the scoping period:

- Comments could be handwritten on comment forms at the scoping meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address: BLM_NM_Southline@blm.gov.

- Individual letters and comment forms could be mailed via U.S. Postal Service to:
 - Bureau of Land Management
Las Cruces District Office
Southline Transmission Project
Attention: Frances Martinez
1800 Marquess Street
Las Cruces, New Mexico 88005

All comments were given equal consideration, regardless of method of transmittal.

2.3.1 Cooperating Agencies

As defined by Council on Environmental Quality regulations, a cooperating agency, or cooperator, is an agency that has special expertise with respect to an environmental issue and/or has jurisdiction by law. Federal, State, and local agencies that have clear jurisdiction over portions of the proposed project routes were invited via formal letter to become a cooperator in the preparation of the EIS. Tribal governments were also invited to participate in the Project as a cooperating agency and to provide special expertise with respect to environmental issues.

The role of a cooperator is to participate in the process and provide leadership, expertise, guidance, and review, as well as to offer information related to the agency's authority. Cooperators were asked to submit a signed memorandum of agreement that identifies the agreed-upon responsibilities for preparing and participating in the EIS, including activities outlined in 40 Code of Federal Regulations (CFR) 1501.6(b). A cooperator could be a Federal, State, tribal, or local agency with jurisdiction by law or special expertise with respect to an environmental issue. An invitation letter was sent to potential cooperators listed below.

Agencies invited to be cooperators included:

- U.S. Air National Guard,
- U.S. Army Corps of Engineers,
- U.S. Bureau of Indian Affairs,
- U.S. Bureau of Reclamation,
- U.S. Customs and Border Patrol,
- U.S. Department of Defense (Fort Huachuca, Davis-Monthan Air Force Base, National Guard),
- U.S. Department of Homeland Security,
- U.S. Environmental Protection Agency,
- U.S. Fish and Wildlife Service,
- U.S. Forest Service,
- National Park Service,
- Arizona Corporation Commission,
- Arizona Department of Environmental Quality,
- Arizona Department of Transportation,
- Arizona Game and Fish Department,

- Arizona State Historic Preservation Office,
- Arizona State Parks Department,
- Arizona State Land Department,
- New Mexico State Land Office,
- New Mexico Department of Game and Fish,
- New Mexico Environment Department,
- New Mexico State Historic Preservation Office,
- New Mexico State Parks Division, and
- Native American Tribes

Agencies that agreed to participate in the project as a cooperator include the following:

- U.S. Army Corps of Engineers
- U.S. Department of Defense Clearinghouse
- U.S. Environmental Protection Agency
- U.S. Department of Defense Fort Huachuca
- National Park Service
- U.S. Forest Service (Coronado National Forest)
- U.S. Fish and Wildlife Service
- Arizona Department of Game and Fish
- Arizona State Land Department
- New Mexico Department of Game and Fish
- New Mexico State Land Office
- Cochise County
- Greenlee County
- Doña Ana County

2.3.2 National Historic Preservation Act and Tribal Consultation

The BLM serves as the lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA), which requires Federal agencies to consult with the public and tribes on the identification of historic properties and the impact that the agencies' undertaking may have on these properties. Western participates with the BLM in this consultation. BLM's consultation with the tribes is conducted on a government-to-government basis, as prescribed by executive orders and legislation, including the American Indian Religious Freedom Act, Archaeological Resources Protection Act, NEPA, and Executive Order 13007. Government-to-government consultation is conducted in accordance with guidance provided in BLM Manual 8120. Consultation efforts are coordinated by the cultural resources team lead from the New Mexico State Office. All records of coordination and consultation efforts, including logistical support for meetings and preparation of materials, are part of the administrative record. Although the BLM and Western are responsible for government-to-government consultation with

regard to the proposed project, other cooperating Federal agencies may elect to engage in separate government-to-government consultation with regard to issuance of permits and/or impacts on cultural resources on lands within their jurisdiction.

The BLM and Western also used the NEPA scoping process to satisfy the public involvement process for Section 106 of the NHPA (16 United States Code 470f), as provided for in 36 CFR 800.2(d)(3). Consultation with American Indian tribes was conducted in accordance with applicable policies; tribal concerns, including the impact on Indian Trust Assets, are given due consideration.

Consultation will be ongoing throughout the project. Consultation efforts, including Section 106 compliance and tribal consultation, are developed in coordination with Western, the cooperating agencies, the Advisory Council on Historic Preservation, and the State Historic Preservation Offices (SHPOs) in Arizona and New Mexico.

3.0 SCOPING COMMENT ANALYSIS AND SUMMARY

3.1 Methodology

Scoping comments were submitted in a variety of formats (i.e., U.S. Postal Service, email, and comment form). All comments and corresponding information, exhibits, photographs, and maps were entered into the comment database. Comments were coded to reflect the subject matter of concern, sorted, and summarized for consideration in the development of the EIS. Comments that were received after the scoping comment period end date (July 5, 2012) will be reviewed to determine whether new issues were raised that need to be included in the EIS.

The sections below provide a summary of comments received by source, type, subject matter, and geographic origin (Tables 5–7).

3.2 Summary

The following tables provide a summary of comments received by source, indicating how the comments were submitted to the project team (i.e., via U.S. Postal Service, email, or comment form). Comments received by issue subject are listed in Table 6. During public and agency scoping, 109 non-duplicative comments were submitted, and 24 comments were received from the same person or organization, for a total of 133 comments received.

Table 5. Number of Comments Received by Source

Source	Comments Received
U.S. Postal Service	39
Email	68
Comment Form	26
Total	133

Notes: Comments received as of August 1, 2012.

Table 6. Comments Received by Issue

Issue Category	Comments Received	Percentage of Total
Air Quality	8	1.4%
Biological Resources	109	18.9%
Cultural Resources	29	5.0%
Hazardous Materials	1	0.2%
Intentional Destructive Acts	1	0.2%
Lands	23	4.0%
Noise	1	0.2%
Military	8	1.4%
Reclamation	1	0.2%
Public Health and Safety	7	1.2%
Recreation	13	2.3%
Request	47	8.2%
Socioeconomics	37	6.4%
Soils and Geology	5	0.9%
Transportation	14	2.4%
Visual Resources	27	4.7%
Water Resources	19	3.3%
Wilderness	4	0.7%
Miscellaneous	23	4.0%
NEPA/Process	199	34.5%
Total	576	

Note: All comments were received by August 1, 2012. Comments received may have included input on several issue categories.

3.3 Distribution of Submittals Received

3.3.1 Geographic Origin

Geographic information was collected from commenter contact information provided in the comment submittals. Whenever incomplete or ambiguous information was encountered during analysis, reasonable attempts to determine geographic origin were made using public directories and the Internet. Of the 109 non-duplicate submittals received, the geographic origin of 20 submittals could not be conclusively determined.

Table 7 provides an accounting of comments sorted by the geographic origin of the comments received during the scoping period, and Figure 2 provides a visual representation of the geographic origin of comments.

Table 7. Geographic Distribution of Comments

Geography	Submittals Received
Albuquerque, NM	1
Baltimore, MD	1

Table 7. Geographic Distribution of Comments
(Continued)

Geography	Submittals Received
Benson, AZ	12
Bisbee, AZ	1
Cheyenne, WY	1
Clifton, AZ	3
Dallas, TX	1
Deming, NM	10
Denver, CO	2
El Paso, TX	1
Florence, AZ	1
Fort Huachuca, AZ	1
Golden, CO	1
Grady, NM	1
Lakewood, CO	1
Las Cruces, NM	9
Marana, AZ	3
Oro Valley, AZ	1
Phoenix, AZ	11
Rodeo, NM	3
San Francisco, CA	1
Safford, AZ	1
Sahuarita, AZ	1
Santa Fe, NM	2
Santa Monica, CA	1
Sierra Vista, AZ	1
Tubac, AZ	1
Tucson, AZ	12
Vail, AZ	1
Washington, DC	1
Willcox, AZ	2
Inconclusive	20
Total	109

Note: Twenty-four commenters submitted more than one comment.

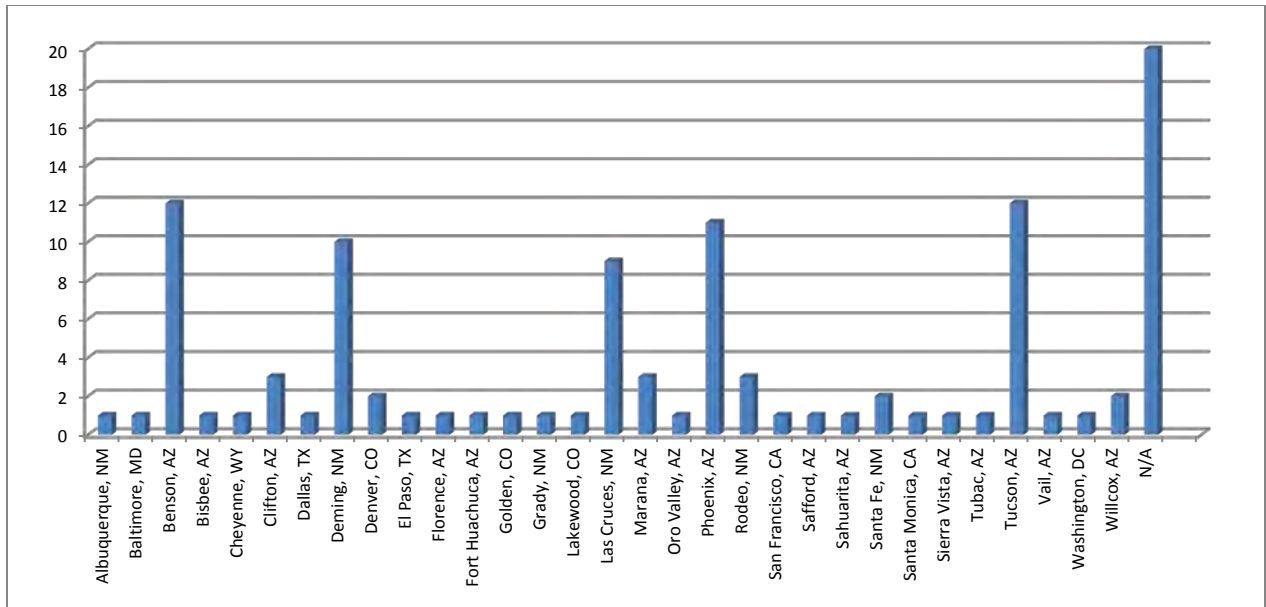


Figure 2. Distribution of submittals by geography.

3.4 Agency and Public Comments by Issue

Both agencies and the public were asked to submit comments during scoping. Table 8 provides a summary of comments received by agency and public entities, sorted by resource topic.

Table 8. Summary of Comments by Resource Type for Agencies and the Public

Resource	Agencies	Public
Air Quality and Climate Change	5	3
Cultural Resources	15	14
Farmlands and Rangelands	1	0
Hazardous Materials and Waste	1	0
Health and Human Safety and Electrical Characteristics	4	3
Lands	10	13
Military	6	2
Recreation	8	5
Socioeconomics and Environmental Justice	13	24
Transportation and Traffic	14	0
Vegetation	7	5
Visual Resources	10	17
Wildlife	39	37
Mitigation and Alternatives	23	14
Need and Reliability	7	10
Process and Resource Management Plan Amendment	14	70
Water Resources	14	5

Table 8. Summary of Comments by Resource Type for Agencies and the Public (Continued)

Resource	Agencies	Public
Other Comments	26	63
Requests for Information	46	28
Total	263	313

3.4.1 Agency Comments by Issue

Comments are summarized below in narrative form for each resource issue area (e.g., all comments specific to recreation are included under the Recreation category; all comments specific to visual resources are in the Visual Resources category, etc.). This section represents a summary of the formal comments received from agencies during scoping. The comment excerpts below are abbreviated and summarized from the original comments submitted.

AIR QUALITY

Dust

- Include detailed discussion of ambient air conditions, national ambient air quality standards, criteria pollutant non-attainment, and potential air quality impacts of the proposed project (both cumulative and indirect)
- Estimate air emissions from construction and maintenance and propose mitigation measures to minimize emissions
- Construction emissions mitigation should include control measures such as fugitive dust, mobile and stationary sources, and administration
- Project is located in a maintenance area for carbon monoxide and a non-attainment area for particulate matter 10
- Consider prevailing winds to comply with applicable air pollution control requirements and minimize adverse impacts

Mitigation

- Implement recommended measures to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off of the construction site

Greenhouse Gas/Climate Change

- Scientific evidence supports the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Global warming is caused by emissions of carbon dioxide and other heat-trapping gases. The draft EIS (DEIS) should consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.

BIOLOGICAL RESOURCES

Avian Species

- Address the potential for increasing the structure height of the Western line to impact migrating birds and raptors moving through the corridor between Whetstone and Rincon Mountains.

- Consider eliminating the proposed route on the east side of the Willcox Playa, which travels through the Willcox Playa Wildlife area, a premier ecotourism destination for sandhill crane and other waterfowl watching. The proposed route would bisect an important travel area and represents a significant collision hazard.
- Information on areas with the greatest potential for avian conflicts with power lines is available and indicates that the proposed ROW intersects with the Lordsburg Playas avian protection area southwest of Lordsburg.
- A known sandhill crane winter use site and migration corridor intersects the proposed ROW east of Columbus, New Mexico.
- The northern aplomado falcon is known to occur in the project area, and some of the proposed construction occurs in suitable undisturbed habitat. Therefore, removal and disturbance of large trees should be avoided.
- In addition to species listed under the Endangered Species Act (ESA), the potential for impacts to species protected under the Migratory Bird Treaty Act should also be addressed.
- Transmission line crossings of riparian corridors with the potential for collision with migratory birds should be studied.

Special Status Species

- Conservation of sensitive vegetative resources, including riparian areas, Pima pineapple cacti, saguaro, and ironwood should be considered.
- Federal and State lists of special status wildlife species known to occur in Doña Ana, Luna, Grant, and Hidalgo Counties should be consulted.
- Special status species known to occur within the immediate vicinity of the proposed ROW are the black-tailed prairie dog and *Atriplex griffithsii* plant.
- The BLM should conduct ESA Section 7 consultations for any listed or candidate species or critical habitat affected by the project within the New Mexico action area.
- The Heritage Data Management System indicates that more than 55 special status species have been documented as occurring in the project vicinity.

Wildlife Habitat

- Black bear travel corridors intersect with the proposed ROW south of Lordsburg and east of the Arizona state line. In addition, mule deer, bighorn sheep, and pronghorn antelope habitat occurs in the Peloncillo Mountains and south of Lordsburg.
- Wildlife habitat data are available in the Habitat Conservation Plan (U.S. Fish and Wildlife Service) to complete biological requirements for NEPA.
- Effects on wildlife corridors should be considered. The Davidson Canyon and Cienega Creek areas have been identified as potential linkage corridors for jaguar and ocelot.
- Fragmentation of habitats across the Southwest is an ever increasing threat, and identification of important wildlife corridors is a key component in planning for habitat conservation.
- The Western rebuild alignment crosses through two areas with regional importance for wildlife movement (Interstate 10/Santa Rita Mountains/Rincon Linkage and Interstate 10/Tucson Mountains/Tortolita Mountains Linkage). Rebuild activities, including tower placement and spacing in these areas, should not create impediments to wildlife movement.

Vegetation

- Suggest more sensitive approaches to managing vegetation that also allow full compliance with North American Electric Reliability Corporation requirements.

Weeds and Invasive Species

- The DEIS should describe postconstruction activities that will be required, such as surveying for invasive species following restoration of the construction site, and measures that will be taken if infestations are found.

Mitigation

- The DEIS should address potential timing considerations and remedies to any direct impacts likely to affect these species: cactus ferruginous pygmy owl, rufous-winged sparrow, western burrowing owl, Pima pineapple cactus, and ground snake.
- Mitigation measures should include the prevention or minimization of electrocution of raptors, construction during periods with the least amount of risk to wildlife, determination of wildlife species that may be using the area and a plan to avoid disturbance during nesting/breeding seasons, avoidance of work near bridges with bats during maternity season, restriction of vehicles and equipment to existing roads, trails, and ROW where possible, and avoidance of wildlife travel areas, and new disturbance should consider revegetation and restoration using native plants.
- The Project should be designed in accordance with the Avian Power Line Interaction Committee document “Mitigating Bird Collisions with Power Lines.”
- Federal Energy Regulatory Commission vegetation management plans that are sensitive to and retain our unique desert vegetation species should be developed.

Cumulative Impacts Analysis

- The scope of federally listed species compliance includes any interrelated or interdependent project activities as well as any indirect or cumulative effects.

General

- To the extent possible, avoid placing infrastructure in, or disrupting the hydrologic balance of, depressions or playa basins that may constitute ephemeral aquatic habitat.
- Tumamoc Hill and Tucson Mountain Park are both important tracts of natural open space and vital biological corridors.
- The Hidalgo County Land Use Plan for Natural Resources should be recognized as a valuable tool in understanding our county’s policy for land use and natural resource management.

CULTURAL RESOURCES

Historic Trails

- The new line appears to be crossing the Butterfield Overland Mail Trail in several places and paralleling in others. The National Park Service is currently evaluating this trail for National Historic Trail status.
- Concern regarding the potential visual impact to the Juan Bautista de Anza National Historic Trail and Los Morteros cultural resource site.

Tribal Resources

- Many of these archeological sites are identified as ancestral sites by the Tohono O’odham and other tribal groups and may also be considered traditional cultural properties (TCPs). Tumamoc Hill is an acknowledged traditional cultural place and has great spiritual and cultural significance.
- Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources. Executive Order 13007, Indian Sacred Sites, requires Federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. The DEIS should address the existence of Indian sacred sites in the project areas, should distinguish Executive Order 13007 from Section 106, and should discuss how the BLM will avoid adversely affecting the physical integrity, accessibility, or use of sacred sites if they exist. The DEIS should provide a summary of all coordination with Tribes and with the SHPO, including identification of National Register of Historic Places (NRHP) eligible sites, and development of a Cultural Resource Management Plan.
- The DEIS should describe the process and outcome of government-to-government consultation between the U.S. Forest Service and each of the tribal governments within the project area, issues that were raised, and how those issues were addressed in the selection of the preferred alternative.

Mitigation

- Documentation and mitigation of impacts to archeological and historic sites and other cultural resources should be conducted.

General

- Tumamoc Hill is a National Historic Landmark and is listed in the NRHP. This historic site has been used for research by the University of Arizona for years and has important biological and cultural values.
- The BLM must seek to identify significant historic and cultural resources within the area proposed for the Project. Adequate identification of these resources is critical for evaluating the Project’s potential direct, indirect, and cumulative impacts. This evaluation will help the BLM to choose or propose additional alternatives that best avoid and mitigate adverse effects on historic and cultural resources.
- The DEIS is required to analyze impacts to cultural resources before changes are made in the building or upgrading of the line. If Southline lines are ultimately located along Silverbell Road, consider contacting the Regional Transportation Authority to coordinate the cultural analysis.
- The project proponent should commission a Class I inventory of the two proposed alignments to provide baseline data on impacts to recorded cultural resources and to assist in the selection of a preferred alignment. When the final determination of the preferred route is made, a Class III on-the-ground cultural resources inventory should be conducted of all previously unsurveyed, or inadequately surveyed, alignment segments to identify and evaluate additional cultural resources that could be affected.
- Before ground-disturbing construction begins, an appropriate Historic Properties Treatment Plan should be developed and implemented to mitigate effects on NRHP-eligible sites in accordance with Federal, State, and county standards.

HAZARDOUS MATERIALS

General

- The DEIS should address potential direct, indirect, and cumulative impacts of hazardous waste from construction and operation of the proposed transmission line and other facilities. The document should identify projected hazardous waste types and volumes and expected storage, disposal, and management plans. It should address the applicability of State and Federal hazardous waste requirements.

Mitigation

- Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste. Alternate industrial processes using less toxic materials should be evaluated as mitigation since such processes could reduce the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste.

INTENTIONAL DESTRUCTIVE ACTS

General

- By adding this power line route, an increase in transmission lines in a congested area would be an easy target for a terrorist attack, thus compromising all power line projects.

LANDS

Rights-of-Way

- Questions addressing the creation of remnant parcels.
- Questions included whether the DEIS would accurately describe what is and what is not conservation land and whether the DEIS would impose co-location of compatible land use to the maximum extent possible. Also, would the DEIS identify Arizona State Land Department Conceptual Planning Areas?
- A request to provide information regarding easements through private lands for new and upgraded lines was submitted.
- Questions included whether significant eminent domain actions are anticipated as part of this project and whether alternatives that incorporate a greater amount of State and/or Federal land would be considered for the alternatives.
- Vehicular upgrades to areas of the ROW may enhance opportunities for illegal access to areas of county-owned/leased properties especially when upgrades are left in place without construction of barriers or other controls to prevent all-terrain vehicle use. Such conditions have left our open space properties vulnerable to the adverse impacts of uncontrolled use, including significant traffic from undocumented immigrants and drug running. We therefore request the development of a mitigation plan and a multiyear commitment to assist in curbing illegal access induced through implementation of this project.

Grazing

- We understand the need for development of necessary infrastructure to provide for current and future energy demands; however, the proposed transmission line will impact range livestock operations associated with grazing allotments in the project area.

- Transmission towers and other facilities will affect each allotment differently, depending on location and affected area in each allotment. Pasture layout and proximity to range improvements should be considered in infrastructure placement.

General

- County-owned preserves, including Cienega Creek Natural Preserve, Bar V Ranch, Tucson Mountain Park, Tumamoc Hill, and Los Morteros are considered lands of particularly high value to county residents for their exceptional cultural and natural resource values. We will be particularly sensitive to any new impacts to these lands and will press for considerations that compensate our lost opportunity to use the impacted areas as mitigation. Where new impacts are not necessary, rebuild activities should strive to lessen the alignment's visual and physical presence. We would welcome the opportunity to discuss alternative routing with the BLM and Southline representatives to avoid or minimize the Project's potential to affect these sensitive properties without transferring undesirable consequences to nearby residential areas.
- The Pinal County Comprehensive Plan should be referenced for land use.
- The DEIS should discuss how the proposed action would support or conflict with the objectives of Federal, State, tribal, or local land use plans, policies, and controls in the project areas. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning, and related regulatory requirements. Proposed plans not yet developed should be also addressed if they have been formally proposed by the appropriate government body in written form.

MILITARY

General

- There is concern that Southline would generate undue electromagnetic field (EMF) interference, which would impact Ft. Huachuca's Electronic Proving Ground (EPG). The EPG overlays almost the entire western third of Cochise County, extending northward from the international border through the city of Benson to just south of the northern boundary of the county. It is important to have a dialogue with Ft. Huachuca throughout the process to ensure that the Project is in accord with Ft. Huachuca's mission.
- Upgrade to the existing transmission and increase in tower height could interfere with military training flight routes.
- Upgrade to the existing transmission line and increase in tower height could affect a proposed Drone program near Benson if there are airspace conflicts.

RECREATION

Comments submitted by agencies pertaining to recreation suggested that the recreation analysis include impacts to historic trails from a recreationist.

Trails

- Impacts to the Continental Divide National Scenic Trail corridor will be an issue to address in the development of the DEIS.
- The Arizona National Scenic Trail provides a recreational and visual experience to long-distance hikers, mountain bikers, and equestrians that is continuous beyond the boundaries of the immediate project area.

- The BLM is encouraged to include in its cumulative effects analysis past, present, and reasonably foreseeable actions that may impact the corridor of the Arizona National Scenic Trail throughout its entire length.

SOCIOECONOMICS

Property Value

- Several high-voltage power lines parallel Interstate 10, and the Western line is located on the west side of the road next to homes in the foothills of the Tucson Mountains. There could be a deleterious impact to health and financial value of existing and future neighborhoods along Silverbell Road with multiple high-voltage power lines belonging to Western, Tucson Electric Power, and perhaps SunZia.
- The Project, regardless of route, will have an impact on several different private land owners in Hidalgo County, who may or may not be willing sellers.

Economic Growth

- Potential danger to wildlife linkages and species conservation could not only harm the environment but also the economic well-being of southern Arizona through deleterious impacts on recreation and the tourism industry.
- Support was expressed for any project that allows economic benefits in the form of job creation and substantial tax base.

Power Rates

- The proposed Project would enhance power supply in the region by adding capacity and redundancy. The project proponent states generally that connection of alternative power sources to the grid would be enhanced by this Project. In terms of promoting economic development such as establishing new industrial uses or electrical generation, we request that the EIS examine the local economic effects as well as those that are more regional in nature.

General

- It is unlikely that the City of Benson governing body would support eminent domain proceedings.

SOILS AND GEOLOGY

Soil Erosion

- Future potential for erosion and need for road maintenance should be addressed to avoid impacts of sediment on downstream habitat and impacts of road maintenance activities. Well-designed roads with maintained waterbars should be considered, especially in areas where the transmission line routing is perpendicular to the natural slope of the land.
- Infrastructure development typically results in removal of vegetation over significant areas. The loss of vegetation can significantly increase rates of soil loss to wind and water erosion.

Mitigation

- Any plans for energy transmission line development should include measures to mitigate erosion and reestablish native vegetation.
- The footprint placement and accessibility of towers and access roads will likely expose these facilities to flooding. Minimization and mitigation of the impacts on flooding potential and

riparian habitat will require site-specific design and consideration of county-wide cumulative effects.

TRANSPORTATION

Aviation

- The DEIS should study impacts to airspace in general.
- The Marana Regional Airport Master Plan on file with the Federal Aviation Administration comes in direct conflict with the proposed route.

General

- All crossings on state roads and Interstate roads will require a New Mexico Department of Transportation (NMDOT) utility permit. As part of the permit, NMDOT will require environmental clearance from our office in Santa Fe, New Mexico.
- Any work adjacent to or within Pima County ROW should be coordinated with the Department of Transportation.
- The guide to the Arizona Department of Transportation permitting process and requirements should be referenced.

Mitigation

- Request the development of a mitigation plan and a multiyear commitment to assist in curbing illegal access induced through implementation of this project.

VISUAL RESOURCES

Comments submitted pertaining to visual resources expressed concern for changes to existing scenic quality and visual impacts. Agency commenters encouraged the use of visual simulations from critical viewpoints within the analysis.

Visual Simulations

- Simulated structures and access from realistic observation points should be included in the DEIS.
- As visual impacts will be a critical consideration, especially where the proposed alignment interfaces with residential areas, natural preserves, and other sensitive areas, the EIS analysis of visual resources should include simulated renderings comparing existing and proposed structures. Similarly, selected viewshed analyses should be provided.

Mitigation

- The BLM should identify adequate measures to mitigate potential adverse impacts to historic and cultural resources. Such measures should include creative ways to resolve difficult impacts associated with visual intrusion and disruption caused by high-voltage power lines and facilities. Measures could include burying lines and/or co-locating lines. Identifying effective mitigation measures will be a critical step in satisfying both NEPA and NHPA. A construction and operations maintenance plan for the transmission line should be included in the DEIS.

General

- The route that goes through the Avra Valley will impact the viewshed of the Saguaro National Park; we ask that this alternative route be taken out of consideration.

- The DEIS should consider visual impacts, especially where the alignments are near or within residential areas and natural preserves.

Cumulative Impacts

- Southline's newer preferred route will just add to the power line congestion if the SunZia project is completed; this congestion will create a negative visual impact to the beautiful slopes of our desert floor.

WATER RESOURCES

Regulatory Framework

- If the construction of the transmission line avoids the discharge of dredged or fill material to Waters of the U.S., then a Clean Water Act (CWA) 404 permit may not be required. Whether a 10 Rivers and Harbors Act of 1899 (RHA) permit is required will depend on whether the transmission line crosses a Section 10 water.
- The DEIS should provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise total maximum daily loads. The DEIS should describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with ongoing protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Groundwater

- The alignment and locations where ground-penetrating construction activities are necessary should be evaluated for the potential to conflict with sewer conveyance facilities. Such potential conflicts should be avoided.
- Concern was expressed regarding the accessibility for maintenance and repair during times of flooding.

Cumulative Impact Analysis

- The analysis should also include effects on water as a result of potential development (i.e., solar development and population growth).

Mitigation

- The DEIS should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality and aquatic resources.

General

- The DEIS should document the Project's consistency with applicable stormwater permitting requirements. Requirements of a stormwater pollution prevention plan should be reflected as appropriate in the DEIS.
- Avoid placing infrastructure in or disrupting the hydrologic balance of depressions or playa basins that may constitute ephemeral aquatic habitat.
- Recommendations for construction of fences, fencing, and earthen dams under Executive Orders 11988 and 11990. Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains and preserve and enhance their natural and beneficial values. Therefore, it may be necessary to contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the CWA if the Project impacts floodplains or wetlands.

- The Western route parallels the Santa Cruz River through the metropolitan area for much of its extent. Flood hazards in the metropolitan Western route are riverine and initially appear to have relatively accurate maps and greater containment. While the towers themselves are readily designed to withstand erosion, substations and any modifications should be protected from the 500-year flood event in accordance with Federal Emergency Management Agency guidelines. The transmission line as well as associated maintenance access roads and fencing unavoidably will cross numerous watercourses regulated by Pima County.
- The Gila, Mimbres, and San Francisco, and Animas watersheds are the most biologically diverse systems in the southwestern part of New Mexico and provide habitat for many threatened and endangered species, including the southwestern willow flycatcher, Chiricahua leopard frog, lowland leopard frog, narrowhead garter snake, and Mexican garter snake. While direct impacts to this area is unlikely, the development of the proposed and alternative routes of the Project will likely affect small, unmapped riparian habitats and wetlands that function as corridors from the Animas drainage to the Gila and Mimbres drainages. These areas should be avoided because they provide important microhabitats for leopard frogs, garter snakes, and other obligate wetland species.

NOISE

General

- A question regarding whether the DEIS would assess auditory impacts was submitted.

HUMAN HEALTH AND SAFETY

Comments submitted pertaining to human health and safety suggested that the analysis consider impacts from EMF to both natural resources and humans.

EMF

- Perhaps the most sensitive issue associated with the Project are concerns associated with EMF generation and the effects, if any, on nearby communities. Southline proposes increased transmission tower height as well as a significant increase in the number of power lines, likely resulting in a corresponding increase in EMF strength. Although the EMF strengths surrounding Southline's new higher-voltage lines will apparently be below maximum national standards for human health, we suggest modeling EMF levels near power lines to determine the possible effects, presenting data in easy-to-understand formats to help illustrate how EMF strength declines as distance from lines increases, and comparing current strengths with those anticipated. Providing these data and conveying it graphically, for example, would be more effective in allaying public concern than solely stating that generated EMFs are safe.

MISCELLANEOUS

Comments submitted and categorized as miscellaneous expressed support for or opposition to the Project. Six agencies submitted general support for the Project, and no agencies expressed opposition.

3.4.2 Public Comments by Issue

Comments are summarized below for each resource issue area (e.g., all comments specific to recreation are included under the Recreation category; all comments specific to visual resources are in the Visual Resources category, etc.). This section represents a summary of the formal comments received during public scoping. The comment excerpts below are truncated from the original comments submitted.

AIR QUALITY

Greenhouse Gas/Climate Change

- It is extremely important that the BLM consider the impacts associated with climate change as it conducts its cumulative impacts analysis for this project, including the likelihood that the Project will carry non-renewable energy sources, such as coal, that produce greenhouse gas emissions.
- The DEIS should consider how climate change could potentially influence the proposed Project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.

BIOLOGICAL RESOURCES

Avian Species

- The Lordsburg Playa is a paramount ecosystem for migratory birds in southwestern New Mexico. In an area with very little open surface water, these ephemeral lakes provide critical habitat for large numbers of shore birds and waterfowl. Transmission lines in this area could interfere with flight paths and could result in the mortality or displacement of large numbers of migratory birds. The flats surrounding the Lordsburg Playa are also home to populations of burrowing owls and black-tailed prairie dog towns, which are known to attract raptors.
- The Project is considering a route that would cross a wildlife corridor through which sandhill cranes fly at the Apache Substation.

General

- The Southline project should include the most accurate, up-to-date geospatial and wildlife data and the most current scientific and other formal guidance to avoid impacting sensitive resources during establishment of the ROW and during actual construction. We recommend that BLM and Western follow the state-by-state guidance below to avoid or minimize additional impacts.
- With regard to minimizing impacts to fragile and diverse resources, the priority must be first to avoid impacts to significant resources, then to minimize and lastly, to mitigate. Utilizing existing rights of way and other disturbed lands is key to avoiding impacts to sensitive resources and this strategy should be employed to the maximum extent possible.
- The routing through the Tucson area has one area of concern – the easement through Tumamoc Hill. I urge you all to work closely with the University and others to find a solution that lessens the impact to this important study area.

Mitigation

- Mitigation is an important requirement of NEPA. The BLM and Western should also make a determination about the value of the habitat to be impacted and establish mitigation requirements for the specific habitat types impacted.

Special Status Species

- Avoiding sensitive resources can be achieved during the siting of actual transmission ROWs within the proposed corridors. This approach to avoidance will be particularly important when transmission line ROWs are planned near sensitive habitats for species of concern, including the following: endemics with restricted distributions such as the Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*), cactus ferruginous pygmy owl (*Glaucidium brasilianum cactorum*), Gila chub (*Gila intermedia*), southwestern willow flycatcher (*Empidonax traillii*

extimus), Mexican spotted owl (*Strix occidentalis lucida*), white-sided jackrabbit (*Lepus callotis*), Chiricahua leopard frog (*Lithobates chiricahuensis*), and Chihuahuan scurfpea (*Pediomelum pentaphyllum*), whose habitats can be effectively avoided; migratory birds protected under the Migratory Bird Treaty Act with substantial flyway stopover habitat requirements, including sandhill cranes (*Grus canadensis*) and snow geese (*Chen caerulescens*); ESA-listed or candidate species such as Mexican gray wolf (*Canis lupus baileyi*), Aplomado falcon (*Falco femoralis*), jaguar (*Panthera onca*), and Sonoran desert tortoise (*Gopherus agassizii*), for which preserving high-quality reintroduction habitat is essential; relatively widely distributed but uncommon species of conservation concern whose habitat coincides with areas likely to be developed, such as western burrowing owl (*Athene cunicularia hypugea*) and raptors, including golden eagle (*Aquila chrysaetos*), protected by the Bald and Golden Eagle Protection Act; and wide-ranging, relatively common species sensitive to habitat fragmentation and disturbance, such as American pronghorn (*Antilocapra americana*), mountain lion (*Puma concolor*), black bear (*Ursus americanus*), Coue's white-tailed deer (*Odocoileus virginianus* var. *couesi*), and mule deer (*Odocoileus hemionus*).

Vegetation

- Consideration of the Sonoran Desert Conservation Plan in Pima County is vital.

Weeds and Invasive Species

- New access roads associated with the transmission line could facilitate the introduction and spread of invasive species, as well as unauthorized motorized activity and associated disturbances, which could impair the functionality of the wildlife linkages.

Wildlife Habitat

- We recommend that new or upgraded infrastructure be installed in such a way as to minimize direct impact or loss of existing native habitat.
- The DEIS should include specific details in the discussion of impacts to the landscape and wildlife, as well as in associated mitigation measures.
- Knowing as much detail about the Project's potential impacts will greatly increase the BLM's ability to decrease impacts through the mitigation hierarchy (avoid, minimize, effectively mitigate), including by informing more specific and stronger mitigation measures.

CULTURAL RESOURCES

General

- Protection of Tumamoc Hill in Tucson is a priority.
- Considering the history of this region, it is highly likely that archeological, historical, and/or cultural resources exist in and around the project area. What are the likely impacts from this Project on these resources?
- The DEIS must consider impacts to the Fort Bowie National Historic Site, which derives much of its authenticity from the unobstructed views to the east of west of Apache Pass.

Historic Trail

- Several historic trails may be directly or indirectly adversely affected by the proposed transmission line project: the Camino Real de Tierra Adentro National Historic Trail, the Juan Bautista de Anza National Historic Trail in Arizona; and the Butterfield Overland Trail, which

the National Park Service is currently evaluating as a National Historic Trail. In the EIS, the BLM should identify any route segments that conflict with National Historic Trail management objectives. To the extent that existing transmission corridors are used, the impacts will be substantially avoided.

Tribal Resources

- An evaluation of potential physical, visual, and social/psychological impacts to Native American TCPs and sacred landscapes also must be included in the EIS. Early and thorough consultation with Native American groups who may have connections to lands within and adjacent to the transmission line corridors is extremely important. Because TCPs and sacred landscapes are highly susceptible to visual impacts, such as from aboveground transmission lines, and because mitigating such impacts is very difficult, the BLM should attempt to resolve tribal concerns by avoiding TCPs and sacred landscapes all together.

Mitigation

- In the EIS, the BLM should identify adequate measures to mitigate potential adverse impacts to historic and cultural resources. Such measures should include creative ways to resolve difficult impacts associated with the visual intrusion and disruption caused by high-voltage power lines and facilities. Measures could include, for example, burying lines and/or co-locating lines. Identifying effective mitigation measures will be a critical step in satisfying both NEPA and NHPA.
- The BLM must prioritize protection of the area's outstanding historic and cultural resources, including significant concentrations of prehistoric and historic archaeological sites, historic trails, and Native American TCPs and sacred landscapes. Accordingly, the BLM should insist on thorough documentation of cultural resources within the proposed Project's area of potential effects through consultation with tribes, SHPOs, local communities, and other interested parties and through archaeological and historical resource surveys. If impacts are unavoidable, the BLM should develop strategies to minimize and mitigate impacts.

LANDS

Rights-of-Way

- Our primary concerns are related to the effects that any proposed routing will have on private landowners, both in terms of land usage and fair market-based compensation.
- We are hoping for the time when the utility will no longer need the easement and will relinquish it.

General

- Residents of rural Arizona are under constant siege in recent years from those who live in distant cities and view our home as a convenient "empty" place to put their highways, pipelines, and power lines. We are asked to bear the burden of projects that will bring us no benefit.
- I think the Project will be a good idea and help a lot of people in New Mexico and Arizona. We are probably the only cattle ranch in the area that has a pretty good size of private land that's all together in one big portion of land.
- We support the principle that it is generally better to site new utilities in landscapes that have already sustained environmental degradation and cannot be restored. But we find the application of the principle in the case of Tumamoc to be highly questionable. First, Tumamoc is a National Historical Landmark, recognized for its pioneering, sustained efforts to restore degraded

ecological landscapes. Inflicting further damage just because the site has already suffered is the opposite of what the people of the United States intended (especially when they extended the landmark to all 860 acres in 1987).

RECREATION

Trails

- An important issue to be addressed in the EIS is impacts on the use and enjoyment of the Continental Divide National Scenic Trail (CDNST). We are especially concerned about the alternate route (via Columbus) between the Afton and Apache Substations. The proposed route would be incompatible with the CDNST, though it might be mitigated if relocated by heading north from Hachita instead of proceeding northwest. Many CDNST through hikers actually walk to the Mexican border by way of Deming, the Florida Mountains, the Tres Hermanas, and Columbus. If the alternate route is considered, it should follow the proposed alignment in the Columbus area, avoiding the mountains.

General

- In the southwestern part of Tucson the route crosses the lower part of Pima County's additions to Tucson Mountain Park, where impacts will need to be minimized.
- The DEIS should fully evaluate all of the impacts that cannot be avoided or minimized so that they can be effectively mitigated.

SOCIOECONOMICS

Property Value

- The current 115-kV line through Mescal will disrupt residences significantly and cause permanent loss of some function and use of these residences, and of course, property values as well. The alternative route may disrupt some visual beauty, but that is a minor effect, compared with losing functionality of your residence and property.
- If it must be done, then I would suggest you do the alternative route through Mescal area (Interstate 10 and Pima County and Cochise City), as it currently goes through a highly populated area, with some lots being very small. This limits the use and value of these homes.

Power Rates

- Population growth may not occur in rural areas that would be negatively impacted by the Project. How can the Project be justified in those areas?
- I believe it should not be allowed in general. It will disrupt and destroy value of landowners, all for a company to make a profit.
- The DEIS should fully examine the costs and benefits using a total economic value approach. It should calculate the total cost per kWh of electricity delivered and compare that figure with the cost of renewable generation in the built environment close to the point of use.

General

- The most sensitive issues associated with rebuilding the existing transmission lines in southeastern Arizona will be social concerns in neighborhoods or developments that Western's line currently crosses.

- We are also in favor of siting new lines near existing or potential clean energy (wind, solar) generation projects, thus helping create clean energy jobs and boost the economy.

Economic Growth

- The DEIS should provide a comprehensive socioeconomic and cost-benefits analysis.
- Jobs and ancillary economic magnifiers related to the project should also be considered.

Environmental Justice

- Residents of rural Arizona are under constant siege in recent years from those who live in distant cities, and view our home as a convenient “empty” place to put their highways, pipelines, and power lines. We are asked to bear the burden of projects that will bring us no benefit.

Cumulative Impact Analysis

- The potential for substantial negative impacts from the transmission corridor capacity expansion Project construction and future permanent maintenance roads and transmission operation (including, but not limited to, environmental degradation of individual homesites, diminished home and homesite values, degraded viewshed and potential human health issues from increased high voltage transmission) is UNACCEPTABLE to the residents and owners of this Community! Such impacts from the Project are not warranted and will be OPPOSED in this location.

SOILS AND GEOLOGY

Mitigation

- Questions included whether the DEIS would include an analysis of the likely impacts from planned road construction on soils and related erosion issues in and around the project area. What are the likely impacts from planned road maintenance on soils and related erosion issues in and around the project area? Will impacts from projected levels of construction vehicle traffic on soils and related erosion issues in and around the project area be analyzed?

VISUAL RESOURCES

General

- These proposed lines would cross some very scenic areas west of Mescal Road, perhaps affecting the view looking west.
- Living in a rural area that has beautiful views, the power lines can be unsightly.
- The alternative route may disrupt some visual beauty, but that is a minor effect, compared with losing functionality of your residence and property.
- The DEIS should discuss why towers need to be the proposed height and what the tradeoffs would be if shorter towers are used and lengthening the span between towers to reduce the overall number of towers.
- The DEIS should also discuss options involving low-glare and low-visibility coatings and materials on all metal surfaces. Reflection of sunlight from towers and lines, particularly the hour or two following sunrise and again before sunset, can be seen for miles and often dominates the natural landscape. The DEIS must address ways to mitigate this particular kind of significant impact.

Mitigation

- Monopole or tubular towers are preferred for lower visual impact.

- Undergrounding the power lines in areas of high visual sensitivity.
- BLM should identify adequate measures to mitigate potential adverse impacts to historic and cultural resources. Such measures should include creative ways to resolve difficult impacts associated with the visual intrusion and disruption caused by high-voltage power lines and facilities. Measures could include, for example, burying lines and/or co-locating lines. Identifying effective mitigation measures will be a critical step in satisfying both NEPA and NHPA. We strongly encourage you to include in the DEIS the construction and operations maintenance plan for the transmission line.
- Visual impact mitigation options should be fully analyzed and required, based on consultation with other agencies, local communities, and the public.

WATER RESOURCES

Mitigation

- Construction best management practices will be particularly important if the line is developed. The major issues that should be addressed include management of sensitive wildlife, land, and water resources; complying with environmental laws, including stormwater pollution prevention; controlling erosion and sediments; and ensuring compliance with reclamation standards.

General

- The Gila, Mimbres, and San Francisco, and Animas watersheds are the most biologically diverse systems in the southwestern part of New Mexico and provide habitat for many threatened and endangered species. These areas should be avoided.
- General concern was expressed regarding the effects of transmission lines on wildlife, people, gardens, and water resources.

SPECIAL DESIGNATIONS

General

- The proposed transmission line may still have direct, indirect, and cumulative impacts on these areas that are in the vicinity of the Project, particularly where the line still crosses into the boundaries of protected lands, or where it is proposed to run adjacent to or in the vicinity of these areas. In light of this, the BLM must consider the direct, indirect, and cumulative impacts to private, State, and Federal special use and designated lands in the proposed study area.

HUMAN HEALTH AND SAFETY

EMF

- The electric and magnetic field strengths surrounding the Project's new higher-voltage lines may be below national standards for nearby human habitation, but this will not alleviate everyone's concern. I thus strongly recommend providing diagrams that show how these field strengths decay with distance from the lines, comparing current field strengths with them.
- The most sensitive area in this regard will be where Western's 115-kV line traverses Midvale Park and other neighborhoods on the west side of downtown Tucson. Other sensitive areas will be the Mescal Community west of Benson and the Vail community east of Tucson. It is worth modeling field strengths adjacent to the lines to determine how these fields will affect surrounding homes, schools, and businesses.

WILDERNESS

General

- BLM lands to the southeast of Fort Bowie National Historic Site have been inventoried for their wilderness characteristics and found to have significant opportunities for solitude or primitive or unconfined recreation. Naturalness of the unit is also ranked high, having been primarily affected by the forces of nature where the imprint of civilization is slight. This area is currently identified as a citizen-proposed wilderness area. The proposed transmission line route should avoid this area in order to maintain the unique wilderness qualities found there.

MISCELLANEOUS

Comments submitted and categorized as miscellaneous expressed support or opposition to the Project.

No public comments were submitted for Transportation, Military, Intentional Destructive Acts, or Hazardous Materials.

4.0 PRELIMINARY ISSUES, CONCERNS, AND OPPORTUNITIES²

4.1 Purpose and Need

Comments submitted pertaining to Project purpose and need emphasized the importance of including a clear explanation of the purpose and need in the context of the electrical power system reliability and need for additional transmission line to supply power. Additionally, commenters thought the purpose and need statement should be clear and broad and reflect potential benefits of the project, public interest in cleaner energy economy, and potential alternative means of achieving that goal.

4.2 Project Description and Alternative Technologies

Comments submitted pertaining to the Project description and alternative technologies included suggestions to include more detail regarding the conditions for the new substations, detailed construction, operation and maintenance plans, descriptions of how the proposed transmission line fits into the regional renewable energy development and transmission in the West, and the extent to which the proposed transmission line will carry renewable energy versus fossil fuel-based energy.

4.3 Transmission Line Routing Alternatives

Agency comments received recommended that the transmission line be routed to the west/southwest of Willcox Playa in areas that are already disturbed, farmed, or have existing utility features, largely to avoid avian concerns. Additionally, commenters suggested that the route be located in open valleys rather than against hills and that facility siting should avoid or minimize impacts to wildlife corridors and landscape connections.

Several comments suggested that watersheds (Gila, Mimbres, San Francisco, and Animas) be avoided. One comment suggested siting the transmission line underground to minimize (aboveground) impacts.

² This scoping summary provides a summation of comments received during the scoping phase; an in-depth analysis of the comments received will be conducted specific to each resource.

Additionally, commenters suggested that several existing documents be referenced for siting considerations, such as Nature Conservancy's Ecoregional Assessment and the Sonoran Desert Conservation Plan.

Several comments suggested routing the transmission line on State lands rather than private lands and upgrading the existing lines in the Benson area. Use of existing lines and ROWs where possible was largely supported by commenters.

4.4 Resource Inventory and Impacts

In addition to the resource categories anticipated for analysis, several new resources categories emerged as a result of scoping, including impacts to military facilities and impacts of EMFs to existing irrigation/agricultural facilities.

5.0 FUTURE STEPS IN THE EIS PROCESS

The BLM and Western will use the comments collected during scoping to define issues and to develop a range of alternatives to address those issues that will be analyzed in the EIS. The impacts that could result from implementing the alternatives will be analyzed and documented in a DEIS.

The DEIS will be made available for public review. The availability of the DEIS will be announced in the Federal Register and advertised in the local and regional media. Public comments will be accepted for 90 days, during which public meetings or hearings will be held to receive comments on the adequacy of the DEIS. The BLM and Western will review and consider all comments received on the DEIS. The document will be modified as appropriate based on public comments; all substantive comments and responses will be incorporated into the Final EIS (FEIS).

The availability of the FEIS will be announced in the Federal Register and advertised in local and regional media. A record of decision selecting the alternative to be implemented will be made by the U.S. Department of the Interior no sooner than 30 days after the date the Notice of Availability of the FEIS is published in the Federal Register.