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August 9, 2012

Mr. Adrian Garcia, BLM Project Manager
Bureau of Land Management
SunZia Transmission Line Project
P.O. Box 27115
Santa Fe, NM 87502-0115
NMSunZiaProject@blm.gov

RE: BLM's Preferred Alternative in the SunZia Draft EIS, issued on May 25, 2012.

Dear Mr. Garcia,

The Cochise County Board of Supervisors would like to thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the SunZia Transmission Line Project (Project), and welcome participation as a coordinating agency throughout the NEPA process for the Project. *Cochise County respectfully requests formal recognition as a Coordinating Agency via a Memorandum of Understanding (MOU) to memorialize mutual expectations and commitments throughout the NEPA process.*

Cochise County recognizes the myriad benefits that SunZia will provide, including facilitating access to significant renewable energy resources and improving the infrastructure and reliability of regional grid systems. We understand that we share a responsibility to assist the Bureau of Land Management (BLM) in providing assessment of SunZia's alternatives and the potential economic, environmental and social impacts identified alternatives may have on Cochise County. It is critical that the BLM reaches out to stakeholders and potentially affected communities and parties for feedback prior to release of a Final EIS. The County recognizes the effort of the BLM in ensuring thorough review under the National Environmental Policy Act (NEPA) by being receptive to extensive input from numerous stakeholders in central and southern Arizona. The credibility of the process depends on incorporating that feedback into the Final EIS.

Following the guidelines set forth in the National Environmental Policy Act (NEPA), the DEIS identifies and analyzes a number of alternative routes and includes a Preferred Alternative route selected by the BLM, that being Subroute 4C2c. Cochise County, however, respectfully requests that the BLM select *Subroute 4B* of Route Group 4 as the Preferred Alternative in the Final EIS.

Cochise County believes that Subroute 4B would be a better alternative to minimizing impacts to sensitive rural communities and resources, including the significant archaeological, paleontological and water resources in the lower San Pedro River Valley. In fact, the impact on rural communities from the construction of a major transmission corridor with up to eight 135-foot towers every mile will not be insignificant if Subroute 4C2c is chosen as the Preferred Alternative in the Final EIS.

The BLM's Preferred Alternative parallels the San Pedro River for 45 miles, which would result in unnecessary negative impacts on the sensitive riparian habitat and water resources in the lower San Pedro River Valley, long identified as a unique ecosystem with high biodiversity, and the largest and best example of riparian woodland remaining in the Southwest. Subroute 4C2c has more mileage of greater impacts than Subroute 4B with respect to biological and water resources -- Subroute 4C2c is 161 miles long, while Subroute 4B is 133 miles long. With 28 more miles Subroute 4C2c has more impact on the environment than Subroute 4B, and will also encroach upon more wells than Subroute 4B. With more mileage comes more accessory construction, including roads, which would thus have greater ground-disturbing potential than Subroute 4B. What's more, Subroute 4C2c traverses a number of perennial feeder streams which would increase erosion risk. In addition, only 12 miles of the 45-mile portion of Subroute 4C2c that parallels the San Pedro River follows existing linear infrastructure. This is the only area along the San Pedro River where Subroute 4C2c follows an existing linear feature. This is an insignificant co-location of utility corridors, and does not make Subroute 4C2c a more environmentally-sound alternative than Subroute 4B. The BLM's Preferred Alternative would damage the San Pedro River Valley, a precious southern Arizona and national resource. Damage to this watershed will be very difficult to mitigate.

We have concerns that Subroute 4C2c would generate undue EMF interference which would consequently impact Ft. Huachuca's Electronic Proving Ground (EPG). It is supremely important to ensure that SunZia does not compromise Ft. Huachuca's mission. Subroute 4B minimizes impacts to military operations by completely avoiding Ft. Huachuca's EPG. In fact, representatives from Ft. Huachuca have indicated that significant mitigation would be required for any 500Kv line that would pass through their designated electronic testing range.

In summary, Cochise County believes that Subroute 4C2c's impacts to the San Pedro River Valley and its residents can be avoided by selecting Subroute 4B in the Final EIS. Subroute 4B better satisfies the numerous and varied concerns raised by the public, local governments and elected officials. The SunZia DEIS indicates that Subroute 4C2c was selected to maximize use of existing utility corridors and infrastructure, minimize impacts to sensitive resources, minimize impacts to residential and commercial uses, and minimize impacts to military operations. The County believes that *Subroute 4B* better meets these criteria. Subroute 4B as the Preferred Alternative in the Final EIS avoids additional impacts to water resources, has fewer impacts to

visual resources (which would achieve the BLM's visual resource management objectives), avoids any impacts to military missions at the U.S. Army's Fort Huachuca, and has substantially less mileage (and resultantly less environmental, paleontological, and social impacts). Furthermore, Subroute 4B impacts fewer known cultural resources and has impacts that are more effectively mitigated.

We wish to emphasize that the federal government does not supersede the authority of state and local control and decision making in siting transmission lines on property not owned by the federal government. Law demands that the BLM identify the least intrusive route for this project. The BLM has failed to do so in identifying Subroute 4C2c as the current Preferred Alternative.

On behalf of my fellow Board members, I thank you for the opportunity to comment on this important project, and we look forward to continued participation throughout the NEPA process.

Sincerely,



Richard R. Searle
Chairman, Cochise County Board of Supervisors

Cc: Patrick G. Call, District 1 Supervisor
Ann English, District 2 Supervisor
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Karen Riggs, Interim Community Development Director
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Mike Pool, Acting Director, Bureau of Land Management
Ken Salazar, Secretary, Department of the Interior
Ray Suazo, Director, Arizona Bureau of Land Management
Mickey Siegel, SunZia DEIS Contractor, Environmental Planning Group