

Response to the Draft EIS
SunZia Southwest Transmission Project

I have considered the Draft EIS for the Proposed SunZia Southwest Transmission Project and must recommend a denial of the permit, a No Action decision.

This response is informed both by the Draft EIS itself and by my own years as a Conservation Commissioner in my town, considering applications for local landscape-altering projects. Of course these were much smaller in scale than the SunZia proposal, but the responsibilities and even the language are familiar. Local Conservation Commissions must:

1. Determine whether or not the proposed changes to the landscape are “significant.”
2. Recommend mitigating measures.
3. Allow significant changes if the applicant can provide “replication.”

Conservation Commissioners are responsible to the State Wetlands Protection Act. Over the years I came to understand we were to find ways to allow projects to proceed, to guide applicants into compliance in these ways:

1. Through rewording the application, to enable a determination of “insignificance.”
2. Through setting up temporary erosion barriers for “mitigation.”
3. Through finding some other piece of ground and turning it into a new wetland by digging and installing listed wetlands indicator species (plants) and establishing a source of water for these plants.

This system for allowing the altering of wetlands is legal, and it is wrong.

Though the BLM has spent significant time and resources studying the environmental impacts of the Preferred Alternate Route for the SunZia Transmission Project and has determined insignificance by finding that certain kinds of impacts will be minimal, or “minimized,” I must disagree and ask that the permit for the project be denied through a No Action decision.

In my town, in my country, and in our modern middle-American culture, we take for granted certain levels of consumption, which require high use of energy and much alteration of landscape. The resulting pollution and degradation of air, land, and water endanger us all. To think we can carve roadways and run high voltage lines, with their supporting structures and footprints, especially along subroute 4C2c, is a mistake. The Lower San Pedro area is treasured by residents, visitors, biologists, and wilderness hikers, not to mention the great number and variety of other living things native here. Also, many species depend upon this area for a migration corridor.

To endanger all this, to permit changes to this landscape that supports so many of us in ways not touched upon by any Conservation Commission or Draft EIS, is wrong.

As responsible land citizens, we must all take a step back from the habits, assumptions, and levels of consumption we take for granted. These have set the

American west on fire, drowned other areas, and driven many populations to poor and desperate circumstances.

Ours is a land of abundance. As “commissioners” in our lives, we all have a responsibility to look up from business as usual and say, “I can see a better way.”

This means no more transmission towers across New Mexico or Arizona. It means support and development of clean power sources locally, town by town and house by house. We have the opportunity now to respond to our energy needs with the thrill of learning new ways which are locally sustainable and not destructive to the living landscape.

We can recognize that the value to all of this subroute 4C2c is not as a pathway for long distance transmission of electricity. Its true value, which cannot be replicated, is inherent in its present unaltered state. We must protect it from ourselves as we change our habits of energy consumption.

Sincerely,

Bonner J. McAllester