



**Coalition for
Sonoran Desert Protection**

300 E. University Blvd., Suite 120
Tucson, Arizona 85705
p (520) 388-9925 • f (520) 791-7709
www.sonorandesert.org

Arizona Center for Law
in the Public Interest

Arizona League of Conservation
Voters Education Fund

Arizona Native Plant Society

Bat Conservation International

Center for Biological Diversity

Center for Environmental
Connections

Center for Environmental Ethics

Defenders of Wildlife

Desert Watch

Drylands Institute

Empire Fagan Coalition

Environmental and Cultural
Conservation Organization

Environmental Law Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro National
Park

Friends of Tortolita

Gates Pass Area Neighborhood
Association

Native Seeds/SEARCH

Neighborhood Coalition of
Greater Tucson

Northwest Neighborhoods
Alliance

Oro Valley Neighborhood
Coalition

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club–Grand Canyon
Chapter

Sierra Club–Rincon Group

Silverbell Mountain Alliance

Sky Island Alliance

Sky Island Watch

Society for Ecological
Restoration

Sonoran Arthropod
Studies Institute

Sonoran Permaculture Guild

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological Society

Tucson Mountains Association

Wildlands Network

Women for Sustainable
Technologies

August 22, 2012

Adrian Garcia, Project Manager
Bureau of Land Management
SunZia Southwest Transmission Line Project
P.O Box 27115
Santa Fe, NM 87502-0115
Via electronic mail to NMSunZiaProject@blm.gov

Re: Comments on Proposed SunZia Transmission Project DEIS

Dear Mr. Garcia:

The Coalition for Sonoran Desert Protection appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the proposed SunZia Southwest Transmission Line Project (SunZia).

I submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 40 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by primarily advocating for: 1) the protection and conservation of Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

Recommendation – adopt the NO ACTION Alternative

We recommend that the BLM adopt the No Action Alternative which the National Environmental Policy Act of 1969 (NEPA) requires you to consider as a viable alternative. We believe that the balance of theoretical benefits of this proposal does not outweigh the considerable long term, if not permanent, negative environmental impacts of developing and operating the proposed SunZia Transmission Line. The environmental consequences of **any** of the other alternatives would result in such significant degradation and potentially irreparable harm to our natural environment that it would be impossible to mitigate for the adverse impacts caused by this proposal.

We fully support the comprehensive and detailed comments submitted by our member groups regarding the DEIS – those comments submitted by Defenders of Wildlife, Sky Island Alliance, Tucson Audubon Society, Sierra Club – Grand Canyon Chapter and others.

We would like to take the time to highlight additional items of concern. These comments focus on our core mission of protecting Pima County’s rich biological resources through comprehensive land-use planning, and specifically an analysis of possible conflicts between the proposed action and the Pima County Comprehensive Land Use Plan, a topic lacking detailed analysis in the DEIS.

Sonoran Desert Conservation Plan

Pima County’s Sonoran Desert Conservation Plan (SDCP) is a ground-breaking effort to conserve the most ecologically valuable lands and resources across the region, while guiding growth into more appropriate areas. The SDCP addresses several elements of resource conservation, including cultural preservation, open space conservation, protection of mountain parks and natural reserves, and ranch conservation, and ecological conservation.

The biological goal of the SDCP is “to ensure the long-term survival of the full spectrum of plants and animals that are indigenous to Pima County through maintaining or improving the ecosystem structures and functions necessary for their survival.” While the DEIS does acknowledge the SDCP, the only major component of the SDCP analytically evaluated in the DEIS are impacts to “priority vulnerable species.”

On page 3-181, the DEIS states:

“Unincorporated areas of Pima County are managed under the SDCP, which includes a science-based conservation plan, a comprehensive land use plan, and a multiple species conservation plan. The SDCP gives “high priority to preserving and protecting (Pima County’s) most important natural resources.” Goals and objectives for the biological element of the SDCP include the following:

- *“Promote long-term viability for species, environments, and biotic communities that have special significance to people in this region, because of their aesthetic or cultural values, regional uniqueness, or economic significance” (Pima County 2010)”*

While the DEIS acknowledges the existence of the SDCP, it fails to evaluate SunZia’s impacts to important elements of this regional conservation planning effort. One key component of the SDCP that deserves further evaluation in the Final EIS is the impact on the Maeveen Marie Behan Conservation Lands System (CLS).

Conservation Lands System

We contend that without further evaluation of the CLS and other components of the SDCP such as Pima County’s proposed Multi-Species Conservation Plan, the DEIS does not satisfy the federal mandate that a DEIS “shall include discussions of possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned” (40 C.F.R. § 1502.16(c)). Furthermore, the DEIS does not align with 40 C.F.R. § 1506.2(d) which states, “To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local

plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.”

The CLS was constructed with participation and oversight by the SDCP Science Technical Advisory Team and according to the most current tenets of conservation biology and biological reserve design. The CLS emphasizes retaining areas that contain large populations of priority vulnerable species; providing for the adjacency and proximity of habitat blocks; preserving the contiguity of habitat at the landscape level; and retaining the connectivity of reserves with functional corridors. Through the application of these tenets, the CLS retains the diverse representation of physical and environmental conditions, preserves an intact functional ecosystem, minimizes the expansion of exotic or invasive species, maximizes the extent of roadless areas, and minimizes fragmentation.

The CLS consists of a map identifying the categories of environmentally-sensitive lands developed by the Science Technical Advisory Team, as well as an associated set of development guidelines and open space set-asides that have been integrated into the County’s planning and zoning regulations and are required for development projects that are subject to a rezoning or other discretionary action. The CLS is part of the Environmental Element of Pima County’s Comprehensive Land Use Plan’s Regional Plan Policies.

Table 1. Acres of Pima County’s Conservation Lands System that would be impacted by typical 400-foot right-of-way associated with SunZia routes.

CLS Categories	SunZia Routes Through Pima County		
	Preferred	4C2	4C2 Local Alternative
Important Riparian	24 acres	670 acres	976 acres
Biological Core Management	638 acres	970 acres	462 acres
Multiple Use Management	124 acres	592 acres	173 acres
Special Species Management	<i>See analysis below</i>		

Important Riparian Areas constitute the most biologically sensitive of CLS lands. They are “critical elements of the Sonoran Desert where biological diversity is at its highest... [They] are valued for their higher water availability, vegetation density, and biological productivity. They are also the backbone to preserving landscape connectivity.”¹ Pima County guidelines recommend a landscape conservation objective of 95% undisturbed natural open space for Important Riparian Areas.

¹ See Pima County’s Comprehensive Land Use Plan and proposed Multi-Species Habitat Conservation Plan permit documents at:

http://www.pimaxpress.com/Documents/planning/ComprehensivePlan/PDF/Policies_Legend/Regional%20Plan%20Policies%20%28pp.%2019-65%29.pdf

Biological Core Management Areas are “those areas that have high biological values. They support large populations of priority vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential for five or more priority vulnerable wildlife species.” Pima County guidelines recommend a landscape conservation objective of 80% undisturbed natural open space for Biological Core Management Areas.

Multiple Use Management Areas are “those areas where biological value are significant...[and] support populations of vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential habitat for three or more priority vulnerable species.” Pima County guidelines recommend a landscape conservation objective of 66-2/3% undisturbed natural open space for Multiple Use Management Areas.

Special Species Management Areas are “areas defined as crucial for the conservation of specific native floral and faunal species of special concern to Pima County. Currently, three species are designated as Special Species: cactus ferruginous pygmy-owl, Mexican spotted owl, and southwest willow flycatcher.” This designation is an overlay on top of the other CLS land designations. Pima County guidelines recommend “at least 80 percent of the total acreage of lands within this designation shall be conserved as undisturbed natural open space and will provide for the conservation, restoration, or enhancement of habitat for the affected Special Species. As such, land use changes will result in 4:1 land conservation (i.e., four acres conserved for every one acre developed) and may occur through a combination of on- and off-site conservation inside the Special Species Management Area. The 4:1 mitigation ratio will be calculated according to the extent of impacts to the total surface area of that portion of any parcel designated as Special Species Management Area.”

Table 2. Acres of Pima County’s Special Species Management Areas that would be impacted by typical 400-foot right-of-way associated with SunZia routes.

Overlap with CLS Categories	SunZia Route 4C2
Important Riparian	284 acres
Biological Core Management	88 acres
Multiple Use Management	473 acres
<i>Areas outside CLS</i>	3 acres

Finally, Critical Landscape Connections are another important component of the CLS. They are “broadly defined areas that provide connectivity for movement of native biological resources but which also contain potential or existing barriers that tend to isolate major conservation areas.” Two of the Critical Landscape Connections are “across the I-10/Santa Cruz River corridors in the

northwest” and “across the I-10 corridor along Cienega Creek in the east,” two areas crossed by the 4C2 route.

Unfortunately, as stated above, the DEIS does not quantify nor even qualify impacts to the CLS, a crucial component of the larger SDCP. The proposed SunZia Southwest Transmission Project poses significant threats to the CLS.

More detailed conservation guidelines and the CLS map can be found in Pima County’s Comprehensive Land Use Plan and proposed Multi-Species Habitat Conservation Plan permit documents. Before a Final EIS and Record of Decision is issued, the BLM needs to more thoroughly analyze possibly conflicts between the proposed action and this local land use plan, as required in 40 C.F.R. § 1502.16(c) and 40 C.F.R. § 1506.2(d).

Biological Resource Conservation Areas

Beginning on DEIS page 4-81, several biological resource conservation areas are identified. It appears however that the list is not complete. The most significant source of funds for open space in Pima County came from voter approval in 2004 of \$174 million in bond funds to acquire conservation lands identified as Habitat Protection Priorities. Several of the properties purchased with these bonds funds are not analyzed in the DEIS.

Cienega Valley – Empire Ranch Reserve

The DEIS does identify Cienega Creek Natural Preserve as a conservation area in this county reserve area. The DEIS fails, however, to identify Bar V Ranch, which would be crossed by Subroute 4C2. Bar V Ranch was conserved not only through over \$8 million dollars in conservation investment from Pima County in the purchase of fee simple lands and state grazing leases, but also through \$500,000 in scenic easement funding from the State Transportation Board in 2004 in order to preserve viewsheds. Bar V Ranch is a critical component of the county’s preserve system, supporting habitat for at least 34 of the 55 Priority Vulnerable Species identified in the Sonoran Desert Conservation Plan.

Subroute 4C2 Local Alternative would directly cross the Poteet property. This 83-acre property was purchased in 2005 and supports important riparian habitat, including habitat for at least seven Priority Vulnerable Species.

Another property in the reserve area that would be affected by the 400-foot right-of-way associated with Subroute 4C2 is the Walden property. This property supports habitat for the Mexican long-tongued bat, Mexican garter snake, and Swainson’s hawk, among others.

San Pedro Valley Reserve

The DEIS analyses impacts to the county’s A7 Ranch beginning on pages 4-84 and 3-106.

The DEIS fails to consider impacts to Pima County Six Bar Ranch, which the BLM Preferred Route would cross. This 12,000 acre ranch contains a major tributary to the San Pedro River –

Edgar Canyon. Besides supporting habitat for a variety of wildlife, the ranch is important in providing an open space corridor between the Santa Catalina and Galiuro Mountains. Much more information about this property, and all other county preserved properties can be found in the *Protecting Our Land, Water, and Heritage: Pima County's Voter-Supported Conservation Efforts* report published February 2011.

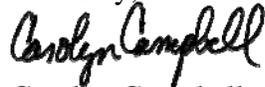
Recommendations:

We encourage the BLM to select the “no action alternative”. However, if BLM selects an action alternative, we encourage the BLM and SunZia to consider the following recommendations. The Final EIS must adequately analyze the direct, indirect, and cumulative impacts of SunZia to Pima County’s Sonoran Desert Conservation Plan, Maeveen Marie Behan Conservation Lands System, and reserves. Before a Final EIS and Record of Decision is issued, the BLM needs to more thoroughly analyze possibly conflicts between the proposed action and this local land use plan, as required by 40 C.F.R. §§ 1502.16(c) and 1506.2(d).

SunZia is a highly controversial project. In addition to the concerns highlighted above, we are concerned with the quality and nature of the public process that has been conducted by the BLM for the SunZia project to date. As such, BLM should provide additional opportunities for meaningful public engagement leading up to the Final EIS, so as to comply with the intent and purpose of NEPA. Issues and input gathered from such public engagement should be used by BLM to inform and guide its decision making process. BLM should consider engaging the US Institute for Environmental Conflict Resolution or other professional mediators to ensure productive communication and increase the likelihood of resolving outstanding conflicts.

We appreciate the opportunity to submit these comments.

Sincerely,



Carolyn Campbell
Executive Director