

Submitted electronically and by U.S. Mail August 1, 2012

Mr. Jesse Juen, Director
Bureau of Land Management
New Mexico State Office
P.O. Box 27115
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Dear Mr. Juen:

We are writing to bring your attention to the format of the public review meetings that were recently held for the SunZia Southwest Transmission Project draft environmental impact statement (DEIS), and to request public hearings in their place. We are also requesting a 60-day extension of the DEIS comment period to provide the time needed for a comprehensive response.

The intent of public review meetings should be to inform the public about a project, provide a forum to ask questions, encourage dialogue, and accept commentary. The only approved speakers at these meetings were those representing the Bureau of Land Management. *No public questioning of the speakers was permitted and no public discussion was allowed.* This narrow approach to public participation prevents the public from raising and discussing essential issues and thus is not in keeping with the spirit and intent of the National Environmental Policy Act. Having been denied the opportunity for this type of discussion, we herein request public hearings that allow stakeholders to question agency representatives. The public expects and deserves this from federal agencies.

Our second concern is the time permitted to respond to the DEIS. *Twenty-two hundred pages* of loosely organized material were dropped on the public and stakeholder groups. Expecting them to read, digest, analyze, and comment on it within 90 days is not realistic. In addition to the sheer volume of material to address, the following are contributing issues:

- Because of the scope and complexity of the DEIS and the substantial and unparalleled ecological resources it affects, stakeholders from across the region want the fullest opportunity to determine its deficiencies, understand potential long-term impacts, and provide commentary. This requires careful, extensive, and time-consuming review.
- Much of this commentary is expected from community volunteers who are not professional analysts, and who have many other obligations. A thorough review would require reading 24 pages per day for the full 90-day comment period.
- A major segment of the BLM's preferred alternative in Arizona (C201) was not presented during the scoping phase of the project. The DEIS is the first public exposure to this alternative, something stakeholders could not anticipate.

- The DEIS does not acknowledge any controversy related to the claimed benefits and purpose of the project. This controversy was brought to the BLM's attention in numerous written scoping comments, requests for correction, and subsequent appeals as the DEIS was being prepared. This failure to address the most controversial aspect of the project further supports the need for public hearings.

To uphold the integrity of the NEPA process, it is necessary for the BLM to hold public hearings on SunZia in at least Socorro, New Mexico, and Tucson, Arizona. Other cities having significant attendance at the initial meetings included Truth or Consequences, New Mexico, and Benson, Arizona. Public hearings will give stakeholders an opportunity to provide meaningful input, discuss issues in a public setting, and have their questions answered. We also request that the BLM extend the comment period for the DEIS for at least 60 days to allow interested parties sufficient time to provide thoughtful, comprehensive comments. We are greatly concerned that this cannot be adequately done within the allotted 90-day comment period.

Sincerely



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