



U.S. Department of the Interior  
Bureau of Land Management

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# SUNZIA SOUTHWEST TRANSMISSION PROJECT

## Right-of-Way Amendment Scoping Report

Volume 2: Appendix C, Public Comment Tables

July 2021





**SunZia Southwest Transmission Project Right-of-Way Amendment  
Environmental Impact Statement  
SCOPING REPORT**

**Volume 2**  
**Appendix C, Public Comments Tables**

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## NEPA PROCESS COMMENTS

### NEPA Process Comments

Submission Number	Comment Text
11	I request that the option of 'project abandonment' be formally analyzed as an alternative to SunZia's latest environmental impact process. Any potential of degradation to our Southwest water resources is to be avoided especially during this historic period of drought, climate change and ongoing population growth.
54	I would like the project to be considered abandoned and the formal analysis of the latest environmental impact process.
60	I am asking the BLM to begin the project abandonment process and that it be formally analyzed and as an alternative in SunZia's latest environmental impact process.
60	So again, institute the project abandonment option, that it be formally analyzed as an alternative to the SunZia's latest environmental impact process. That power line is going to impact a migratory birds area and valuable water resource here in the incredibly dry southwest
63	SunZia's plan to build an electric corridor has unacceptable impacts on Arizona's last remaining desert ecosystem and it's essential that project abandonment is formally analyzed as an alternative to SunZia's latest environment impact process.
67	I am calling to demand that project abandonment be formally analyzed as an alternative in SunZia's latest environmental impact process.
70	I urge that project abandonment be formally investigated as the most responsible alternative in SunZia's latest environmental impact process.
74	I'm calling to ask you for a project abandonment to be formally analyzed as an alternative to the SunZia's latest environmental impact process.
75	I strongly urge you to consider the project abandonment as an alternative in the present consideration of the environmental impact of SunZia's transmission line proposal.
77	We urge BLM to spare no effort in using the National Environmental Policy Act (NEPA), its implementing regulations, and related statutes and regulations to assess the new SunZia R-o-W application in relation to already altered and rapidly changing environments and opportunities to lay out coordinated regional and interregional plans for power transmission.
77	In particular, BLM is advised to review the new SunZia application not as an amendment to an approved R-o-W grant, but for what it is: a major bundle of significant and impossible-to-mitigate impacts to unique and fragile environments that have changed irrevocably in the decade since the analyses that resulted in the 2015 record of decision. These changes tip the balance against pro forma BLM approval of the new R-o-W and in favor of a broad review and reconsideration of the public benefits from SunZia.
77	Identify and analyze a complete and reasonable range of alternatives, specifically including, at a minimum, (a) no action alternative (existing approved SunZia R-o-W grant),
77	The public needs and deserves a NEPA process and a DEIS that demonstrates full cognizance of the concerns raised above and three critical convergences of environmental impacts.
94	I encourage timely completion of BLM's public review period.
98	Consider a Project Abandonment Option: The BLM should consider the larger picture of what is the best way to achieve the goal of transporting energy from New Mexico to other western states.

Submission Number	Comment Text
105	LSPWA requests that issues, studies, and alternatives contrary to SunZia's corporate interest be considered in the main body of next environmental review document, not conveniently dismissed and buried in a public comment appendix by an environmental contractor who is being paid by SunZia, as took place to a high degree during the prior SunZia NEPA processes.
105	After SunZia received a Record of Decision from the BLM six years ago, SunZia's permit application at the Arizona Corporation Commission was approved by a narrow 3-to-2 margin, following an extended set of hearings in which there was compelling testimony in opposition to SunZia that painstakingly detailed extensive adverse impacts to an area of unique biological wealth and rich cultural resources found along the most remote and previously undisturbed stretch of the San Pedro River. Part of this evidence included a letter written in 2012 to the BLM by SunZia's own project manager admitting that this route would be ecologically inappropriate [page J-737 in the SunZia Final EIS of 6/14/2013].
105	2) Impacts and cumulative effects to all resources in New Mexico and Arizona affected by the requested amendments must be re-analyzed from what was memorialized in SunZia's original EIS, particularly with regard to additional lands sought for construction staging, permanent access roads, new route alternatives, and new substations. Given the magnitude of miles/acreage of additional permanent access roads, miles/acreage of each new route alternative, and the fact that the former EIS is a critical part of the evidentiary basis for seeking state permits, a comprehensive table of all proposed changes that were not analyzed in the first EIS should be prepared, followed by a detailed analysis of additional impacts associated with these changes, including changes that were not disclosed in the recent Notice of Intent, such as new lighting requirements by the Federal Aviation Administration.
105	3) Given the trend of the SunZia proposal toward increasing adverse ecological impacts to both of the major north-south river ecosystems in the region and the new perspectives the nation has gained during the past decade about the importance of minimizing the length and impacts of proposed tie-lines for renewable energy transmission, it is essential that project abandonment be analyzed as an alternative in the next EIS. This can be analyzed in terms of both positive and negative impacts. When a project proposal languishes for such a long period of time and is surpassed in permitting by other transmission proposals that avoided paralleling our last remaining river ecosystems in the region, this abandonment alternative must be analyzed for the sake of future generations. Analyzing project abandonment as an independent alternative is reasonable, because it is the most direct way to consider if it is a good idea for federal agencies to amend additional resources management plans for a project that has embraced a highly controversial route design concept from the beginning. With our desert river ecosystems vanishing, now is not the time to throw good resources after bad.
105	Please include project abandonment and the two additional routes we suggested for Component 3 as analyzed alternatives in SunZia's next EIS.
105	Additionally, please document and analyze all changes proposed in the Notice of Intent and any other project proposal changes not specified in that Notice, provide a detailed change analysis relative to impacts documented in the first SunZia EIS, and vet this project proposal as requested in points 5, 6, and 7, as listed above. All seven of these points are directly related to making an informed decision about continuing to support this particular transmission project proposal.
109	Archaeology Southwest advises the U.S. Bureau of Land Management (BLM) that this proposed expansion of SunZia environmental impacts the latest phase in a long, complex, and controversial planning and permitting saga requires intensive scrutiny in terms of whether the needs for and benefits of this much-altered proposal outweigh public interests in maintaining ecosystem and landscape integrities and in mitigating the rapidly unfolding effects of the climate crisis. We urge BLM to spare no effort in using the National Environmental Policy Act (NEPA), its implementing regulations, and related statutes and regulations to assess the new SunZia R-o-W application in relation to already altered and rapidly changing environments and opportunities to lay out coordinated regional and interregional plans for power transmission. In particular, BLM is advised to review the new SunZia application not as an amendment to an approved R-o-W grant, but for what it is: a major bundle of significant and impossible-to-mitigate impacts to unique and fragile environments that have changed irrevocably in the decade since the analyses that resulted in the 2015 record of decision. These changes tip the balance against pro forma BLM approval of the new R-o-W and in favor of a broad review and reconsideration of the public benefits from SunZia.
109	The public needs and deserves a NEPA process and a DEIS that demonstrates full cognizance of the concerns raised above and three critical convergences of environmental impacts.
109	1. The Climate Crisis and the now-confirmed and still-escalating types and levels of environmental change in the SunZia impact area mean that all baselines used in the 2015 FEIS must reconsidered and the proposed action must be completely re-analyzed.

Submission Number	Comment Text
116	I appreciate that the National Environmental Policy Act is a very detailed and thorough process. However, I am concerned this critical infrastructure project is taking too long to build. Permitting should never be so difficult that vital energy projects take decades to complete.
133	Release detailed map information as early as possible. I suspect that the BLM is a recipient of this data from SunZia in this particular case. SunZia has a conflict of interest with respect to this data becoming available, so they may not want to release it. What I would suggest is that the BLM should delay any activity regarding a rerouting in the future with a day for day slip and put SunZia or any other applicant on notice that they are in the critical path of their own schedule desire as an incentive to get them to release data, i.e. set a milestone for something like a public hearing and tell the applicant in no uncertain terms that at a minimum of 120 days before a public hearing can take place, the applicant must turn over all of the information to the BLM that is pertinent to the public hearing. This would include data such as GIS data (detailed coordinates, shape files, or kml/kmz files) and other data regarding the activity, so the public can have access to this data well in advance of any public hearing so they have time to incorporate the released information into alternate suggestions or other concerns regarding the project. My suspicion is that SunZia is slow to provide this data to the BLM and that should not be the case. The public needs to be informed.
134	9) Analyses of route alternatives through Sevilleta NWR must consider and explain whether the alternatives are consistent with the Sevilleta NWRs purpose to preserve and enhance the integrity and the natural character of the ecosystems of the property by creating a wildlife refuge managed as nearly as possible in its natural state. The analysis should include short-term temporary impacts and long-term and permanent impacts. One short-term impact that must be fully analyzed is the effect of temporary access roads for construction. One long-term impact that must be fully analyzed is the effect of using more of the existing ROW for the new development; although the ROW width would not change, the impacts within the ROW would.
136	3) Connection to AZ System Will Require Connected Actions Which Have Not Been Analyzed No public information has been released on interconnection or transmission service requirements for connecting the SunZia project to the Arizona system and delivering the electricity SunZia carries to end markets. The existing Arizona system cannot integrate/transmit 4500MW in the substation locations as proposed which will trigger new transmission that has not been assessed. The new proposed SunZia West connection will also trigger new connected action transmission to be built, and will therefore require a new process at the ACC. The new Arizona facilities need to be identified in the EIS process and included in impact analysis and be subject to proposer review and process, or else the EIS will be subject to legal challenge since clear connected actions were not analyzed.
138	Under the National Environmental Policy Act (NEPA) and subsequent rule-making, the initial Scoping Process is designed to allow any individual, group, or agency to collaborate with the federal oversight agency to define the range of issues and potential alternatives to be analyzed in the Environmental Impact Statement (EIS). To support meaningful public participation, all information including all studies, all issues, all potential alternatives to those promoted by the applicant must be incorporated into the body of the Draft EIS (DEIS) rather than concealed in footnotes, appendices etc. as has been done in previous documents. This is an issue.
138	1.Abandon the Project. This is a case of throwing state and federal money and paid time into an idea that was poorly conceived from the beginning. Since at least 2009, the project has been at the expense of taxpayers despite a claim made in 2010. If there has been a cost analysis by the Government Accountability Office (GAO), it will show what this project has cost the Department of Interior alone. Had this been a bona fide project, 12 years would have been more than adequate. Refer to Chairman Little's dissent.
139	My baseline recommendation would be to stop this project altogether.
141	We understand that BLM intends to tier this EIS to the 2013 EIS, to expedite the review of several resource impacts. We remind the agency, and other cooperating agencies, that in order to tier the EIS to the 2013 EIS, the agencies must make, and provide to the public, clear and accurate findings that the conditions and environmental effects described in the 2013 EIS and associated documents are still valid, or alternatively address any exceptions. 43 CFR 46.140. Anything short of these findings would render the new EIS inadequate and likely invalid
141	As always, we remind the agencies that NEPA requires them to show their work during these critical stages of project planning and we will be sure to review all documents associated with this project as they are released.
144	Alternatives must include, but not be limited to: a true no project alternative that would result in no project being built; and siting alternatives that would re-route the line away from sensitive areas including avoiding crossings and transmission along the San Pedro River, in Aravaipa Canyon, and adjacent to the Rio Grande River.



Submission Number	Comment Text
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: the permitting of other transmission in the area in the time since the initial ROW was issued including the Southline Transmission Project in Arizona and New Mexico (which is along a route with far less impacts to sensitive habitats and resources than SunZia) and Western Spirit Transmission in New Mexico;
153	1.) Given the trend of the SunZia proposal toward increasing adverse ecological impacts to delicate ecosystems in the region and the new perspectives the nation has gained during the past decade about the importance of minimizing the length and impacts of proposed tie-lines for renewable energy transmission, it is essential that project abandonment be analyzed as an alternative in the next EIS. This can be analyzed in terms of both positive and negative impacts. When a project proposal languishes for such a long period of time and is surpassed in permitting by other transmission proposals that avoided paralleling sensitive river and other ecosystems in the region, this abandonment alternative must be analyzed for the sake of the future generations that the BLM mission purports to sustain. Analyzing project abandonment as an independent alternative is reasonable because it is the most direct way to consider if it is a good idea for federal agencies to amend additional resources management plans for a project that has embraced a highly controversial design concept from the beginning. a. Renewable energy resources are often harnessed hundreds of miles from urban areas which are located far from the existing electrical grid. Before these stranded renewable energy resources can be used by residential and business consumers, a delivery system must be in place to transport that energy from its source. SunZia could instead encourage the development of other smaller-scale wind and solar farms along its route, all of which will help meet the growing demand for new renewable energy without excising huge swaths of terrain for transport and access along mega-corridors.
153	4.) Impacts and cumulative effects to all resources in New Mexico and Arizona affected by the requested amendments must be re-analyzed from what was memorialized in SunZia's original EIS, particularly with regard to additional lands sought for construction staging, permanent access roads, new route alternatives, and new substations. Given the magnitude of miles/acreage of additional permanent access roads, miles/acreage of each new route alternative, and the fact that the former EIS is a critical part of the evidentiary basis for seeking state permits, a comprehensive table of all proposed changes that were not analyzed in the first EIS should be prepared, followed by a detailed analysis of additional impacts associated with these changes, including changes that were not disclosed in the recent Notice of Intent.
153	5.) Include in the EIS all third-party studies related to the economic feasibility of the SunZia transmission proposal! Promotional hype by the applicant about cost-effectiveness and marketability can be very misleading to the public, investors, and regulators. It is not uncommon for a speculative project to fail after adverse environmental impacts have already occurred. Disclosure of actual third-party economic feasibility studies for long-distance tie-lines that purport to transport over 90% renewable energy must be included in the main body of the EIS before the next Record of Decision is considered. These highly relevant studies were buried in the public comment appendix of the last SunZia EIS, like many other bits of information, where they could conveniently be ignored by decision-makers and made difficult to find for the public.
163	Although you plan to tier the new EIS to the 2013 EIS, the current proposal will require significant new analysis. The proposed timeline of having a completed EIS by the Fall of 2022 seems overly optimistic
171	During this scoping process, please be open to expanding the geographic scope of this EIS to additional segments of the route as well. Specifically, I am most concerned about the segment that traverses the San Pedro River Valley. It is my opinion that these lines are improperly sited in Arizona. The BLM should expand the purview of the current EIS to include route alternatives that avoid the San Pedro River Valley. Alternatively, I encourage the BLM to deny this permit altogether, given the environmental damage that would be caused by the project as a whole.
182	I appreciate that the National Environmental Policy Act is a very detailed and thorough process. However, I am concerned this critical infrastructure project is taking too long to build. Permitting should never be so difficult that vital energy projects take decades to complete.

Submission Number	Comment Text
184	<p>1.) Given the trend of the SunZia proposal toward increasing adverse ecological impacts to delicate ecosystems in the region and the new perspectives the nation has gained during the past decade about the importance of minimizing the length and impacts of proposed tie-lines for renewable energy transmission, it is essential that project abandonment be analyzed as an alternative in the next EIS. This can be analyzed in terms of both positive and negative impacts. When a project proposal languishes for such a long period of time and is surpassed in permitting by other transmission proposals that avoided paralleling sensitive river and other ecosystems in the region, this abandonment alternative must be analyzed for the sake of the future generations that the BLM mission purports to sustain. Analyzing project abandonment as an independent alternative is reasonable because it is the most direct way to consider if it is a good idea for federal agencies to amend additional resources management plans for a project that has embraced a highly controversial design concept from the beginning. a. Renewable energy resources are often harnessed hundreds of miles from urban areas which are located far from the existing electrical grid. Before these stranded renewable energy resources can be used by residential and business consumers, a delivery system must be in place to transport that energy from its source. SunZia could instead encourage the development of other smaller-scale wind and solar farms along its route, all of which will help meet the growing demand for new renewable energy without excising huge swaths of terrain for transport and access along mega-corridors.</p>

## PUBLIC INVOLVEMENT COMMENTS

### Public Involvement Comments

Submission Number	Comment Text
1	I received your recent project postcard so I may be on the mailing list or email. But I would like to be sure.
8	I have requested information on this project from the BLM (Adrian Garcia) and it has not been forthcoming.
58	Senator Heinrich was on the Sunday website and gave a speech on how wonderful renewable energy was. What kind of incentive did he get for forcing New Mexicans into the forefront of destroying your landscape and health to give energy to California? Also, they never answered my question yesterday as to the danger of living near these power lines. How do you call this clean renewable energy when it affects health and the environment? How is it that no one can directly answer this question when they are all responsible for this project? There was not one person on that panel that can directly answer this question.
58	Also, I just feel like this came upon us. We've had this property for 16 years, I feel like this came upon us very suddenly, We found out about it by accident when SunZia tried to purchase some of the parcels and easements in our subdivision, which I believe is illegal according to the covenants. Otherwise, we would not have found out about this. This is the problem with these scoping meetings, this and that, everything is hidden until it's too late to do anything about it.
58	Another thing is why can't they make a decision sooner? Our lives are on hold for this. They need to make a decision and if they do go through with it, it would be horrible, horrible for Santa Rita Subdivision. We're 89 homesteads out there, we don't have the money to fight this and nobody ever said anything to us in these past years except for us finding out about this by accident, by the purchase of these parcels. Otherwise, we still would not have known, we still would not have been involved in these meetings. So there's something going on there that's not right, and I thought the BLM was for New Mexico. I understand, SunZia's telling us the BLM has the final decision making in this entire process. Is that true?
66	[provided name, address, and phone number for mailing list (redacted)]
69	We received the mailing and so forth for the SunZia Transmission project, NEPA process, etc., scoping period and all of that. I have tried to go online and entered the address for attending the virtual public scoping meetings and your link is not working. It's just a black screen that comes up for the E planning for the scoping periods for Tuesday through Thursday, June 22nd through 24th. If I'm not getting the screen, I would assume many others are not able to sign up for it as well so, please call me back at 505-975-8858, that's my cell number, and let me know how I can be scheduled in with the virtual meeting.

Submission Number	Comment Text
77	Comments offered at the June 23, 2021 scoping meeting for the new SunZia proposal confirm keen interests on the parts of New Mexicans and Arizonans in protecting landscapes and viewsheds from alterations not unambiguously in the public interest. We hope BLM took heed of those comments and of views voiced previously: close consultation with all communities affected by government land management, especially interested tribes and local residents directly affected by the proposed R-o-W, must complement scientific research as essential bases for decisions like the SunZia application.
77	Archaeology Southwest appreciates the opportunity to provide these comments. We look forward to continued collaboration with BLM, tribes, and stakeholders to protect cultural resources.
85	Last week I was able to participate in one of your three (3) available, public forums, which the BLM sponsored and presented, in connection with its due diligence regarding the pending EIS. First, let me please thank the BLM for making such forums available to interested members of the New Mexico public, and I also wish to thank the BLM for allowing those of us who participated in one or more of the forums to learn valuable information related to the BLM, the SunZia Southwest Transmission Project (Project), and the current status of the EIS.
85	In addition to being able to hear from BLM employees on this matter, you also allowed the public citizens the opportunity to listen directly to the SunZia personnel, and the combination of SunZia personnel, who all were informative, courteous and respectful to the public questioners, as well as to the BLM personnel, who answered questions as well. Last, but not least, your comments were also informative and courteous to all concerned. The net effect of the courtesy shown by all of the forum members, when combined with what appeared to me to be objective and factual data, related to the EIS and to the Project which was the subject of the EIS, was a long (more than two [2] hours) Zoom presentation, that was factual, objective and open to any and all questions by the members of the public who observed the presentation, including myself.
96	More time is needed to assess impacts and to provide comments and alternatives for consideration. The short period between receiving materials and the due date for comments leaves us with too little time to provide meaningful feedback, especially with the holiday weekend and observance of Independence Day on July 5th. Providing only six business days from the last scoping meeting to the comment deadline over a holiday is inadequate. Please consider extending the scoping period at least 30 days
105	Meaningful public participation in determining the scope of alternatives and issues that will be addressed and analyzed in the next SunZia Environmental Impact Statement (EIS) is prescribed in rules and case law associated with NEPA. To make an informed decision about SunZia's requested amendments, it is essential to respect NEPA's mandate for meaningful public participation, because the public does not have the professional lobbying resources at its disposal that have been employed by SunZia for over a decade of trying to squeak by the various permit processes at the state and federal levels, despite major public and institutional opposition arising from siting conflicts.
109	Comments offered at the June 23, 2021 scoping meeting for the new SunZia proposal confirm keen interests on the parts of New Mexicans and Arizonans in protecting landscapes and viewsheds from alterations not unambiguously in the public interest. We hope BLM took heed of those comments and of views voiced previously: close consultation with all communities affected by government land management, especially interested tribes and local residents directly affected by the proposed R-o-W, must complement scientific research as essential bases for decisions like the SunZia application.
123	[provided name, address, and phone number for mailing list (redacted)]
133	Release detailed map information as early as possible. I suspect that the BLM is a recipient of this data from SunZia in this particular case. SunZia has a conflict of interest with respect to this data becoming available, so they may not want to release it. What I would suggest is that the BLM should delay any activity regarding a rerouting in the future with a day for day slip and put SunZia or any other applicant on notice that they are in the critical path of their own schedule desire as an incentive to get them to release data, i.e. set a milestone for something like a public hearing and tell the applicant in no uncertain terms that at a minimum of 120 days before a public hearing can take place, the applicant must turn over all of the information to the BLM that is pertinent to the public hearing. This would include data such as GIS data (detailed coordinates, shape files, or kml/kmz files) and other data regarding the activity, so the public can have access to this data well in advance of any public hearing so they have time to incorporate the released information into alternate suggestions or other concerns regarding the project. My suspicion is that SunZia is slow to provide this data to the BLM and that should not be the case. The public needs to be informed.

Submission Number	Comment Text
133	The BLM, in the future should release a draft NOI, prior to the final release of the NOI. This too, would allow the public to provide ample time to provide more informed comments. In addition, in this particular case, the formal NOI was released on 4 June and first public hearing was 22 June, with comments due on 6 July. The issue with this timing is that there was information provided at the public hearing that had a material bearing on public comment. Due to this, the comment period was in some aspects shortened to less than 30 days, i.e. more like 2 weeks because of the delay to have the public comments in so closely after the public hearing. If a draft NOI came out with the schedule laid out, of when the NOI would come out and when the public hearing would be, it would provide the public more time to prepare informed comments.
136	More time is needed to adequately identify information, to assess impacts, and to provide alternatives for consideration. As such, a request for additional time for scoping was submitted June 29th. These additional July 6, 2021 comments are submitted despite the lack of adequate time, and are therefore preliminary, without many details that could help the agencies identify useful information, analysis and alternatives for consideration.
160	In addition to the comments that I've already submitted under separate cover, my request is that the comments of the LSPWA should also be considered in their entirety. The comments of the LSPWA are uploaded here for reference, contained within the file with the title, "LSPWA scoping comments on SunZia NOI of 2021.pd [note from SWCA: this letter is already coded under the LSPWA submission
170	I didn't think that there's enough time for people to get involved with the meetings and things like that, especially with the concerns of COVID.
170	I think that there should be extended time and maybe additional meetings.
173	The project needs to be reviewed and resubmitted so that the public can all attend without zoom meetings. Most people did not even know about the project being restarted. Total lack of notification.

## LAND USE PLAN CONFORMANCE AND CONSISTENCY COMMENTS

### Land Use Plan Conformance and Consistency Comments

Submission Number	Comment Text
29	Moreover, SWNR was established specifically to return the land to its pre-human state; installation of the towers and their maintenance are in direct conflict with this mandate.
115	The Department also believes that the original intent of the stipulation in the land grant deed was not envisioned to allow new construction projects to co-locate within the existing easements, but was in fact put there in order to prevent any future commercial development within the Sevilleta. Additionally, habitat disturbance would extend beyond the existing easements, in order to accommodate for construction activities and long-term maintenance.
133	The BLM should take into consideration, when private landowners and communities are involved, deed restrictions and covenants of that community. SunZia is out trying to negotiate with individual landowners who are members of a community with a Homeowner's Association (HOA) knowing full well that their endeavor that would go through this private community is in violation of multiple covenants of the community. This is negotiating in bad faith and the BLM should not put themselves in a position to appear that they are supporting an organization that is negotiating in bad faith. If the BLM would like a copy of the covenants that SunZia is violating, they can be made available on request. This alone should make the long route around Ladron not viable, aside from all of the other aspects stated in previously submitted comments in more detail about the most recent SunZia request.

Submission Number	Comment Text
134	Defenders is concerned with potential impacts the proposal may have on wildlife and wildlife habitat in Sevilleta National Wildlife Refuge (NWR) and Sierra Ladrone Wilderness Study Area. As natural desert landscapes, they are particularly vulnerable to human disturbances. The BLM and Fish & Wildlife Service (FWS) must ensure that the proposal is compatible with Sevilleta's purpose and will not impair the wilderness characteristic of Sierra Ladrone.
134	9) Analyses of route alternatives through Sevilleta NWR must consider and explain whether the alternatives are consistent with the Sevilleta NWRs purpose to preserve and enhance the integrity and the natural character of the ecosystems of the property by creating a wildlife refuge managed as nearly as possible in its natural state. The analysis should include short-term temporary impacts and long-term and permanent impacts. One short-term impact that must be fully analyzed is the effect of temporary access roads for construction. One long-term impact that must be fully analyzed is the effect of using more of the existing ROW for the new development; although the ROW width would not change, the impacts within the ROW would.
164	First, any resident of Santa Rita Ranches that sells their property for commercial use, or sells an easement for commercial throughways, is in violation of the Santa Rita Ranches POA Covenants, which I believe would bring into doubt as to the legitimacy of SunZia's acquisitions of Santa Rita Ranches properties (not to mention the legality, since Covenants listed in Socorro County can be seen as Law).
176	Bosque del Apache NWR. was established using the authority of the Migratory Bird Conservation Act (16 U.S.C. 712d) of 1936, to provide refuge and breeding grounds for migratory birds and other wildlife as well as incidental fish and wildlife-oriented recreational development, the protection of natural resources, and the conservation of endangered species or threatened species. Sevilleta NWR. and the Ladd S. Gordon Waterfowl Areas managed by the New Mexico Department of Game & Fish were established afterward with a similar purpose - to conserve remnants of habitat in the face of landscape fragmentation. Sun Zia transmission lines crossing the MRG would further fragment the habitat continuity and habitat restoration efforts to which state and federal agencies have made significant investments since 1936.

## COOPERATION AND COORDINATION COMMENTS

### Cooperation and Coordination Comments

Submission Number	Comment Text
76	You need to schedule a separate meeting for the tribes on this project. It's been a long time since this thing's been going. It's been a long time since the tribes met. I think you need to set up a separate meeting in person or virtual with the 4-7 tribes and our colleagues at Apache and I'm talking mainly about Arizona now. I do not know the intention of the tribes in New Mexico. You can reach me at [phone number redacted].
77	Comments offered at the June 23, 2021 scoping meeting for the new SunZia proposal confirm keen interests on the parts of New Mexicans and Arizonans in protecting landscapes and viewsheds from alterations not unambiguously in the public interest. We hope BLM took heed of those comments and of views voiced previously: close consultation with all communities affected by government land management, especially interested tribes and local residents directly affected by the proposed R-o-W, must complement scientific research as essential bases for decisions like the SunZia application.
77	The 2015 programmatic agreement (to satisfy the requirements of the National Historic Preservation Act) for the approved R-o-W does not include provisions for changes to the R-o-W. Neither that agreement nor the 2015 FEIS adequately consider or address the Rio Grande and Rio San Pedro as likely cultural landscapes. The impending DEIS must do so. A new or substantially amended programmatic agreement is now required.

Submission Number	Comment Text
84	The New Mexico Renewable Energy Transmission Authority (NM RETA) was created by the New Mexico legislature as the state authority to facilitate the development of electric transmission and storage projects utilizing renewable energy resources. NMRETA and SunZia have had a formal arrangement since 2014. Recently, NMRETA and SunZia furthered their arrangement by entering into a public-private partnership agreement to jointly develop the New Mexico portion of the SunZia Southwest Transmission Line ("1SunZia Line"). As a co-development partner, NM.RETA will have an integral voice in all decisions related to the development of SunZia Line. As a New Mexico state authority, NMRET A will ensure that the concerns and priorities of New Mexicans are considered over the course of SunZia's development. NMRET A also has an environmental review process that is coupled with its independent board. The NMRETA board is comprised of the State Treasurer Cabinet Secretary of the Energy Minerals & Natural Resources Department, three appointees from the Governor, and appointees from both the Speaker of the House of Representatives and Senate President Pro Tempore. The elected and appointed officials, working with their staff experts, guide decisions that are in the best interest of New Mexico. In addition, NMRETA provides regular updates to an interim committee of the NM Legislature, the New Mexico Finance Authority Oversight Committee. This broad representation will provide an additional objective and thorough vetting of the SunZia transmission line.
97	3=MRGCD and Reclamation have jurisdiction over the river and floodway, and MRGCD's extends further to canals and other irrigation infrastructure. Please coordinate with MRGCD about the river crossings and permitting. What access will be needed during line construction?
109	Comments offered at the June 23, 2021 scoping meeting for the new SunZia proposal confirm keen interests on the parts of New Mexicans and Arizonans in protecting landscapes and viewsheds from alterations not unambiguously in the public interest. We hope BLM took heed of those comments and of views voiced previously: close consultation with all communities affected by government land management, especially interested tribes and local residents directly affected by the proposed R-o-W, must complement scientific research as essential bases for decisions like the SunZia application.
109	BLM is advised to give special consideration to the vital importance of the Rio Grande and Rio San Pedro corridors as cultural landscapes and as region-defining visual resources that are far too precious to sacrifice for incompletely considered, profit-driven projects, especially a tie line with extraordinarily high visual impacts. The 2015 programmatic agreement (to satisfy the requirements of the National Historic Preservation Act) for the approved R-o-W does not include provisions for changes to the R-o-W. Neither that agreement nor the 2015 FEIS adequately consider or address the Rio Grande and Rio San Pedro as likely cultural landscapes. The impending DEIS must do so. A new or substantially amended programmatic agreement is now required.
109	3. The independent, piecemeal process that the BLM has used to plan and evaluate proposals for power transmission does not serve public interests. The Federal Government is advised to engage the proponents for SunZia, Southline, and related projects and activities in deliberations toward a regional master plan that optimizes the efficiencies of renewable energy generation and transmission while minimizing adverse environmental impacts.
115	All three of the alternative sites where SunZia is proposing to cross the Rio Grande occur in designated critical habitat for the federally endangered southwest willow flycatcher ( <i>Empidonax traillii extimus</i> ), Rio Grande Silvery Minnow ( <i>Hybognathus amarus</i> ) and the threatened yellowbilled cuckoo ( <i>Coccyzus americanus</i> ). SunZia should enter into consultations with the U.S. Fish and Wildlife Service for species specific guidance on avoiding and minimizing impacts to aquatic and riparian habitats, as well as seasonal restrictions during transmission line construction.
132	The 2015 comment letter from Pima County recommends habitat protection and restoration efforts to offset the roughly 2,400 acres of County Conservation Lands in the San Pedro watershed that would be impacted by SunZia. Specifically, the request was to Work with Pima County to collaboratively develop and implement a long-term monitoring and adaptive management plan that includes but may not be limited to, the control and eradication of invasive species, proliferation of off-road vehicle impacts, effective habitat restoration and vegetation management, and protection of cultural resources. The long-term monitoring and adaptive management plan will be effective for no less than 20 years and will be codified through an enforceable means. We support this recommendation as mitigation for habitat impacts in this important conservation area and request that a full accounting of impacts and mitigation be presented in the DEIS
133	I do not know what process that the BLM uses to consult with the sovereign nations contained within New Mexico and Arizona but this too should be part of putting together the Draft EIS.
138	4.Coordinate with the Borderlands Transmission Project.
139	I recommend an expert be called in from Avian Power Line Interaction Committee (APLIC) to consult on this project.

Submission Number	Comment Text
141	This region is ancestral hunting areas for Acoma people. Going back to before the Pueblo Revolt, it was under the stewardship of Piro speaking pueblos in Socorro, Piro is now an extinct language. The inhabitants of these lands were taken with mainly Tiwa speakers from Isleta to several mission villages in Texas and Mexico. The BLM and cooperating agencies must conduct meaningful consultation with Ysleta del Sur, as well as the Piro Manso Tiwa tribe in Las Cruces.
159	White Sands Missile Range (WSMR) is pleased to be a cooperating agency on the Environmental Impact Statement (EIS) for the SunZia Southwest Transmission Project. We believe we can contribute valuable input specifically for the Segment 4 Reroute portion of the EIS that is within the WSMR Northern Call-Up Area (NCUA).
185	A specific item to be considered in the new RMP is the golden eagle nest in the Winchester Mountains, NW of Willcox, AZ. Birds of prey such as raptors, owls, vultures, and eagles are vulnerable to electrocution and powerline strikes during construction and operation. There are a number of design features that can minimize impacts to these important species. Tuk Jacobson is the Department's raptor expert and will be willing to share information on best management practices; he can be contacted at kjacobson@azgfd.gov or 623-236-7575. Power poles can serve as perches for many birds of prey and there are design features for structures that can reduce impacts to these important species. Another possible alternative to reduce mortality is using bird flight diverters to decrease avian mortalities. Again, Mr. Jacobson has expertise in all of the best management practices and would be available to share his knowledge in the pre-design phase of this project. Additionally, the Department recommends that SunZia consider timing of construction within this area as it relates to the eagle breeding season (August to mid-December) and plan accordingly.

## PURPOSE AND NEED COMMENTS

### Purpose and Need Comments

Submission Number	Comment Text
2	In 2012 / 2013 era Michael Picker was the green energy advisor to then Governor of CA Jerry Brown. During that time period or approximately thereafter I had a email conversation with Mr Picker about SunZia touting selling green energy to California. Mr Picker's response was an emphatic "NO". Times change, so can you please provide to the public the current basis of SunZia's marketing people insistence upon claiming this transmission line will be used to provide energy to California.
9	Since the SunZia NEPA process was initiated in 2009, much has changed. There are alternatives to the proposed SunZia route. Existing high voltage lines in the northern parts of Arizona and New Mexico will have available capacity due to reduced use of coal generated power. It makes far more sense both economically and environmentally to use that capacity to transport power from the New Mexico wind elds to western population centers instead of opening new utility corridors, especially along bird migration routes. The project is more ill-advised than ever.
58	Senator Heinrich was on the Sunday website and gave a speech on how wonderful renewable energy was. What kind of incentive did he get for forcing New Mexicans into the forefront of destroying your landscape and health to give energy to California? Also, they never answered my question yesterday as to the danger of living near these power lines. How do you call this clean renewable energy when it affects health and the environment. How is it that no one can directly answer this question when they are all responsible for this project? There was not one person on that panel that can directly answer this question.
58	Another thing is why can't they make a decision sooner? Our lives are on hold for this. They need to make a decision and if they do go through with it, it would be horrible, horrible for Santa Rita Subdivision. We're 89 homesteads out there, we don't have the money to fight this and nobody ever said anything to us in these past years except for us finding out about this by accident, by the purchase of these parcels. Otherwise, we still would not have known, we still would not have been involved in these meetings. So there's something going on there that's not right, and I thought the BLM was for New Mexico. I understand, SunZia's telling us the BLM has the final decision making in this entire process. Is that true?

Submission Number	Comment Text
77	Clearly define and assess the proposed R-o-W alteration purpose, need, and viability.
77	BLM is advised to give rigorous attention to SunZia's economic feasibility and to opportunities to combine and coordinate the siting of power transmission facilities on regional and interregional scales.
81	is project is being built with the intent of encouraging and enabling many large future wind farm projects in central and southern New Mexico that are intended to provide green energy to Arizona and California. If this project is so good for New Mexico, why isn't it even better for Arizona and California? Why isn't it being built in AZ and CA to encourage wind turbine sites there since they are the intended beneficiaries? The proposed transmission lines are not needed for New Mexico's current or foreseeable future needs, but are speculative projects being built for profit by private investors and other outside interests to obtain cheap green electrical energy without defacing their own natural environments?
81	Why don't CA and AZ build their own renewable infrastructure there instead of building it in New Mexico? Would this massive scale, high impact, heavy industrial use be accepted in large scenic and agricultural areas of Arizona and California? It was clearly stated in the scoping hearing that the SunZia project is being built by outside investors for speculative profit and the benefit of Arizona and California. Why should New Mexico become a massive scale industrial wind and power transmission park for the benefit of Arizona and California?
84	New Mexico has historically been an exporter of thermal-sourced power supply to markets such as California, Arizona, and Texas. As states and corporations increasingly move toward clean energy resources, the vast renewable resource potential in New Mexico creates an opportunity for the state to become a major supplier of clean energy needs of other states while continuing to serve the needs of in-state customers. In June 2020, NM RETA released findings from a landmark: Energy Transmission and Storage Study compiled by Virginia-based energy company ICF Consultants that specifically looked at this potential. The study examined the development potential for renewables to serve in-state and out-of-state demand over the next 10 years, and the transmission system alternatives that could support the interconnection of those renewables to New Mexico and export to areas of demand while maintaining system reliability requirements. Based on the findings, New Mexico has more than enough renewable energy and capacity to meet residential and business electricity demands in advance of New Mexico's Energy Transition Act's (ETA) requirement for 100% zero-carbon electricity for utilities by 2045 and rural electric cooperatives by 2050. It also identified that New Mexico's renewable capacity could expand from 2,500 MW as of the end of 2019 to 11,500 MW by 2030. This consists of 2,500 MW existing, 3,100 MW currently under development and 5,900 MW of new projects identified as a part of this study. The 11,500 MW would satisfy New Mexico's clean energy goals as well as support the goals of other states. To support the -addition of renewables at this scale, roughly 900 to 1300 miles of new transmission and supporting equipment is required. ICF Consultants identified the greatest value for transmission would be to expand capabilities to the western states. The investment made in support of renewables and transmission reflects up to \$11 billion through 2032 by project developers resulting in up to 3,700 jobs per year during peak construction plus up to 800 permanent jobs. Adding an extra transmission corridor to connect New Mexico to the neighboring markets was identified as the top priority in the Study. It also identified that existing transmission corridors were preferred over new corridors in order to minimize the need for acquisition and permitting of new right-of-way (ROW). The SunZia project meets this priority by providing new infrastructure to reach western markets with the ability to co-locate with existing infrastructure in order to minimize impacts.
105	5) Include in the EIS all third-party studies related to the economic feasibility of the SunZia transmission proposal. Promotional hype by the applicant about cost effectiveness and marketability can be very misleading to the public, investors, and regulators. It is not uncommon for a speculative project to fail after adverse environmental impacts have already occurred. Disclosure of actual third-party economic feasibility studies for long distance tie-lines that purport to transport over 90% renewable energy must be included in the main body of the EIS before the next Record of Decision is considered. These highly relevant studies were buried in the public comment appendix of the last SunZia EIS, where they could conveniently be ignored by the decision makers.
105	7) Include in the EIS a third-party career vetting analysis of each principal owner involved in the SunZia project, with particular attention to the success rate of all prior project proposals.



Submission Number	Comment Text
109	Archaeology Southwest advises the U.S. Bureau of Land Management (BLM) that this proposed expansion of SunZia environmental impacts the latest phase in a long, complex, and controversial planning and permitting saga requires intensive scrutiny in terms of whether the needs for and benefits of this much-altered proposal outweigh public interests in maintaining ecosystem and landscape integrities and in mitigating the rapidly unfolding effects of the climate crisis. We urge BLM to spare no effort in using the National Environmental Policy Act (NEPA), its implementing regulations, and related statutes and regulations to assess the new SunZia R-o-W application in relation to already altered and rapidly changing environments and opportunities to lay out coordinated regional and interregional plans for power transmission. In particular, BLM is advised to review the new SunZia application not as an amendment to an approved R-o-W grant, but for what it is: a major bundle of significant and impossible-to-mitigate impacts to unique and fragile environments that have changed irrevocably in the decade since the analyses that resulted in the 2015 record of decision. These changes tip the balance against pro forma BLM approval of the new R-o-W and in favor of a broad review and reconsideration of the public benefits from SunZia.
109	As duty-bound trustees for public lands and interests, BLM and other U.S. Government agencies are charged with taking all practical steps to address the Climate Crisis and enable climate change adaptation. We advise BLM to proceed deliberately to close the gap between management of BLM lands and scientific studies of climate change by actively integrating available research results into land management plans, practices, and decisions. 3 U.S. courts are now consistently doing something they were not doing in 2015: upholding requirements for BLM and other federal agencies to consider the Climate Crisis in their decision regarding land alterations.
109	On the basis of our focal considerations and emergent issues we request and recommend BLM carefully address each of the following issues in planning, preparing, and presenting the draft environmental impact statement (DEIS) for the proposed changes to the SunZia project. 1. Clearly define and assess the proposed R-o-W alteration purpose, need, and viability. BLM is advised to give rigorous attention to SunZia's economic feasibility and to opportunities to combine and coordinate the siting of power transmission facilities on regional and interregional scales.
132	Accordingly, we request confirmation that, despite FERC Order 888 equal access regulations, this line would under no circumstances be allowed to carry energy generated from non-renewable resources.
135	As a state that legislated the Energy Transition Act, we know that in order to move forward with renewable energy and address the transition from fossil fuels, we do need to address transmission. Regardless if SunZia will be approved or not, our state will still need massive infrastructure and transmission upgrades to meet our own renewable energy goals set by the ETA and to participate in the national renewable energy market and just simply to make our grids more resilient and capable of equitably accommodating our population while withstanding upcoming weather extremes.
136	2) The SunZia proposal now indicates a DC line capable of 3,000MW would be built first, a change from prior indications capable of an AC line capable of 1,500MW would be built first. If the first line is capable of 3,000MW, this questions the need for the second line and/or suggests alternatives should be considered. Why grant two 500kV AC lines at 3,000 MW total with 400-1000 feet of new disturbance, when one 500kV DC line could transmit the same amount of MW at a fraction of the impact? Reducing the scope to one 500kV line would reduce impacts significantly, at a similar capability to two AC lines.
138	The Sevilleta National Wildlife Refuge, managed by the Department of Interior's Fish and Wildlife Service (FWS), formalizes the importance of the Rio Grande as essential sustenance for wildlife. The same role in Arizona's San Pedro River is formalized by the San Pedro River National Conservation Area (SPRNCA) managed by the Department of Interior's Bureau of Land Management (BLM). To permit the SunZia Project access across and parallel to these important rivers would be undermining their missions. This is an issue.
138	In SunZia's 2016 Arizona state permitting process, the dissent of Chairman Little and another Arizona Corporation Commissioner to Decision No. 75464 reveals "significant defects" in SunZia's process and plan. <a href="https://docket.images.azcc.gov/0000168504.pdf?i=1624826557873">https://docket.images.azcc.gov/0000168504.pdf?i=1624826557873</a>
138	SunZia invented its own purpose and need as articulated by Chairman Little. Please revisit the purpose, need, and economic feasibility of this project in this new EIS, consider project abandonment as one of the alternatives,
140	I would like to see evaluation in the EIS of the need for this project, and the possible other ways of providing for our electrical needs through on-site generation and reductions in electricity consumption.

Submission Number	Comment Text
144	The Notice states that the purpose of the Project is to transport up to 4,500 megawatts of primarily renewable energy from New Mexico to markets in Arizona and California. However, nothing in the BLMs permitting process or other approvals will limit the line to transporting renewable energy. Moreover, changed circumstances, including the permitting of other transmission in this area, may show that this purpose can be met in other ways.
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: transmission capacity on other exiting transmission lines that has been and may continue to be freed up due to retirement or planned retirement of coal or gas fired plants in the region;
145	SunZia's amended right of way proposal should be denied because: (1) the proposed use is inconsistent with the purpose for which BLM manages the public lands described in SunZia's application; (2) the proposed use is not in the public interest; (3) SunZia is not qualified to hold a grant; (4) issuing the grant would be inconsistent with the Federal Land Policy and Management Act, other laws, or these or other regulations, and; (5) SunZia does not have or cannot demonstrate the technical or financial capability to construct the project or operate facilities within the right-of-way. See 43 C.F.R. 2804.26(a).
153	Social and Economic Conditions The BLM says that its vision is to enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources, but this project simply does not benefit those whose properties will be destroyed by construction of the SunZia lines. It only provides for other populations whose socio-economic status and access to resources is already at an advantage. Some of the BLMs guiding principles are supposedly to cultivate community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication. How, exactly, has the Transmission Project fulfilled these principles? What does the SunZia project do to enhance the lives of individual and family landowners, retirees, small farmers and ranchers, or nearby native populations who experience particular socio-economic difficulties different than many of their urban and suburban peers? What is proposed? In my and my family's dealings with SunZia so far, each of the above principles has been sorely unapparent. With all these concerns, what recourse is there?
153	6.) Include in the EIS the stated power purchase interest of all utility partners involved in the SunZia project, disclosing both the amount and source of electrical energy desired to be transported by SunZia and their backers and partners.
158	Recommendation 1: The BLM should take into consideration the system as a whole from generation, through transmission and distribution to determine whether or not the plan is viable and whether or not access should be provided at all, i.e. to perform some type of benefit and impact analysis about the project itself. One outcome of this activity under consideration could be for the BLM to deny the entire project if it is not in the overall best interests of the public good. It is too narrowly beneficial to one corporation instead of the public good and the multi-use doctrine of the BLM as it pertains to public lands. This project emphasizes one use of the land as more important than others.
158	Recommendation 2: Due to the passage of time, the BLM should consider whether or not the current approved plan is still valid, or needs to be revisited because of changing market conditions, changes to the environment, or changes to environmental laws or policies since the approval in those jurisdictions that the route traverses. This is mentioned due to the fact that it is the approved plan and may be the default position if the other plans in the application by SunZia are denied. Additionally, all aspects of the original Environmental Impact Statement and Resource Management Plan should be considered to apply to this new phase unless they are not specifically applicable.
158	Recommendation 3: If the BLM rejects the notion that this project is ill advised and not in the interest of the public good, then they should deny the new request for rerouting, consider any updates as required per Recommendation 2, and stay with the approved plan. It appears that this motion for rerouting as opposed to implementing the approved route is solely to save SunZia costs and address any concerns that WSMR may have, which SunZia is able to mitigate through burial of the transmission lines. The BLM should not put themselves in a position to give the appearance that they are concerned about the cost of this activity to SunZia as it is not part of this process.

Submission Number	Comment Text
167	Our neighboring states are doing exactly what we are doing- installing more solar and wind. Each market area is trying to sell the same thing to its neighbor. At some point, the market next door will cease to buy because it will be generating plenty of its own. Companies such as Facebook at Los Lunas have installed their own solar farm and don't need to buy power from a wind farm or a utility. Community solar is rapidly becoming a developer's new approach- their customers will not need to buy from a utility or wind farm. Individual home owners install standalone solar systems- and they do not need to buy from a wind farm or a utility. That is the trend. But the companies who are installing current power line infrastructure don't want to look ahead. They want to complete an installation project and get paid. Has anyone at the State or Federal agency level (such as BLM) looked ahead to calculate when the alleged demand for all this power will be neutralized? I think long distance transmission will be obsolete in 10 to 20 years ,
172	SunZia, et al, should be debated as to the real purpose of the proposed route for their so called merchant application. They are running those lines to areas that are mining districts and not for use as suggested. They are trying to get power and gas (Lobo gas line application withdrawn for now) too Lincoln county, Chavez county, and Socorro county for existing and planned mining operations: White City/Jarales in Lincoln, the Garnet mine purposed in Chavez county, and the Strawberry peak mine in Socorro county (already in operation) are the areas in direct line with these powerlines. According to newspapers they have been working quietly for decades to get this completed. Approval of this line system would make the permit applicant and perhaps the PRC liable to the landowners due the fact that when SunZia change the purpose for their operation as stated for application approval they are "taking" from the landowners and the government.
172	The fact that the State Land Commissioner, Audrey Dunns' gaining financially from this powerline is an indication that their is, at the least, anti trust issues and perhaps collusion. During the 60 day wait period Dunn set forth, the project, the SunZia people continued to send out requests for ROW. Then Dunn goes and purchases a ranch along the route. Really? One elected official making financial gain from this project is to many. They are also running this line through a hazardous waste site, caused by Eagle Picture battery manufacturing along the base of 'M' mountain in Socorro county. How is this possible? Does the NMED and EPA know about this and how could it be allowed?
172	New Mexico Tech has been hiding this mining district in Socorro county for decades and now have the land acquired along route. They are involved in this project as well. They, NMT owns multiple pieces of property that the lines are designed to follow.
175	The SunZia project will enable new electric transmission infrastructure which is vital to strengthening our region's electricity grid and positioning New Mexico as a leader in the renewable generation industry. Over much of my New Mexico legislative career I have become familiar with the SunZia Project and am encouraged by its progress towards the development of clean energy and-,positive economic benefits for New Mexicans. SunZia is key to unlocking New Mexico's renewable energy resources to bring sustainable economic development to our state and move us forward toward our goal of becoming a carbon-free environment
184	Social and Economic Conditions The BLM says that its vision is to enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources, but this project simply does not benefit those whose properties will be destroyed by construction of the SunZia lines. It only provides for other populations whose socio-economic status and access to resources is already at an advantage. Some of the BLMs guiding principles are supposedly to cultivate community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication. How, exactly, has the Transmission Project fulfilled these principles? What does the SunZia project do to enhance the lives of individual and family landowners, retirees, small farmers and ranchers, or nearby native populations who experience particular socio-economic difficulties different than many of their urban and suburban peers? What is proposed?
184	5.) Include in the EIS all third-party studies related to the economic feasibility of the SunZia transmission proposal! Promotional hype by the applicant about cost-effectiveness and marketability can be very misleading to the public, investors, and regulators. It is not uncommon for a speculative project to fail after adverse environmental impacts have already occurred. Disclosure of actual third-party economic feasibility studies for long-distance tie-lines that purport to transport over 90% renewable energy must be included in the main body of the EIS before the next Record of Decision is considered. These highly relevant studies were buried in the public comment appendix of the last SunZia EIS, like many other bits of information, where they could conveniently be ignored by decision-makers and made difficult to find for the public.
184	6.) Include in the EIS the stated power purchase interest of all utility partners involved in the SunZia project, disclosing both the amount and source of electrical energy desired to be transported by SunZia and their backers and partners.
184	7.) Include in the EIS a third-party career-vetting analysis of each principal owner involved in the SunZia project, with particular attention to the success rate of all prior project proposals.

## ALTERNATIVES COMMENTS

### Alternatives Comments

Submission Number	Comment Text
9	Since the SunZia NEPA process was initiated in 2009, much has changed. There are alternatives to the proposed SunZia route. Existing high voltage lines in the northern parts of Arizona and New Mexico will have available capacity due to reduced use of coal generated power. It makes far more sense both economically and environmentally to use that capacity to transport power from the New Mexico wind elds to western population centers instead of opening new utility corridors, especially along bird migration routes. The project is more ill-advised than ever.
14	6.The old and condemned wooden bridge at Scholle Rd. over the arroyo just south of Rt. 60 is already impacted by Western Spirit. How will SunZia handle the condemned bridge? This is the main road into this area for many residents. The bridge is in great disrepair and could benefit from at least a resurfacing and a guard rail. Is this a repair that SunZia could consider?
14	7.Scholle Rd. (Socorro County Road 125)is mandated by Socorro County for Light Traffic Only. The sign put up by Western Spirit (EC Subcontractor Folks) may address the requirement of the lighter weight limit imposed by Socorro County due to the disrepair of the road; however, the amount of pick-up truck and service truck traffic is very heavy under Western Spirits (EC) workforce. The road has deteriorated considerably with the increased truck traffic. Will this traffic increase with SunZia and if so, how will SunZia provide better access to this 1 lane county road? I'm asking for safety reasons, ours, our neighbors, and all the cows and wildlife that graze along this road. Note: The service road provided and built by Western Spirit (EC) does not satisfy all their access needs. They still use the County Road all day long.
14	1.Why is Segment 4 re-route even being proposed? An approved route already exists.
14	2.Are the proposed SunZia line(s) paralleling to the north or south of the Western Spirit line?
14	4.How wide is the SunZia path now and what is the maximum width for future lines?
21	We recommend that the forthcoming EIS for SunZia include a new alternative for the project: abandonment of the stretches of transmission line that are planned to run parallel to the San Pedro River and the Rio Grande, because of the environmental damage they will cause.
24	Why is the project seeking additional working areas outside the ROW?
24	What technology is SunZia using to assure the most efficient transmission of its energy, to prevent voltage loss over the 500+ miles of the project? Are they high-voltage direct current transmission lines, or alternating current lines?
26	Why not put it along I-40 where it will be less disruptive for birds and wild life?
30	Additionally, there are other alternatives: use the alternate route around Ladrones Mountains OR use the already approved route along the east of Los Pinos Mountains and along the south border of Sevilleta and across the river at Escondida.
31	I urge you to consider using an underground line for the SunZia transmission line beneath the Rio Grande and for its entire floodplain.
46	A preferable approach would be master-planning at the Federal level, leading to the selection of a single, direct route and to the construction of one high-capacity transmission line. Such high-capacity lines are common in other countries (e.g. China, India, Italy). The lines can be engineered so that each arm of a tower supports as many as six cables. The Federal Government should take a more proactive approach in transmission line permitting and requirements. Given the significant environmental impacts caused by transmission lines to the human and natural environment, care must be taken to ensure that the proposals are both necessary and environmentally compatible. The SunZia Transmission Project fails on both of these tests. It is unnecessary given the other transmission projects and it is not environmentally compatible because it traverses area of high biological wealth.

Submission Number	Comment Text
48	There appears to be an established route along Interstate I-25 which would have more accessibility to established infrastructure, such as, utility/tower maintenance, hazard control, and catastrophic response.
77	BLM is advised to give rigorous attention to SunZia's economic feasibility and to opportunities to combine and coordinate the siting of power transmission facilities on regional and interregional scales.
77	(b) use of one or more existing industrial or transportation R-o-Ws to accommodate the transmission needs, along with abandonment of the existing approved R-o-W grant to SunZia,
77	(c) no river corridor alternative,
77	The addition of new, substantial, and questionable types and levels of environmental impacts to the existing bundle of impacts analyzed in the 2015 Final EIS obligates BLM to consider a broad range of alternatives in the upcoming DEIS.
77	Failure to analyze the alternatives outlined above, and other viable options to be determined, will reward SunZia for delaying the foreseeable planning work that made this new NEPA process and DEIS necessary.
77	Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources
77	The Climate Crisis and the now-confirmed and still-escalating types and levels of environmental change in the SunZia impact area mean that all baselines used in the 2015 FEIS must reconsidered and the proposed action must be completely re-analyzed.
77	The independent, piecemeal process that the BLM has used to plan and evaluate proposals for power transmission does not serve public interests. The Federal Government is advised to engage the proponents for SunZia, Southline, and related projects and activities in deliberations toward a regional master plan that optimizes the efficiencies of renewable energy generation and transmission while minimizing adverse environmental impacts.
78	Also it seems wise and efficient to rebuild the existing transmission through the Sevilleta NWR, not disturbing more ROW property through that area.
79	The Board of Directors met with SunZia representatives on June 4, 2021. We expressed our concerns about a powerline being installed across the southwest corner of our subdivision. With the millions of acres in New Mexico of public land, we hope whoever makes the decision of the powerline route will opt for one of the other two routes that bypass populated areas.
86	I own a lot in the Santa Rita Ranches development.... Why cant you run this power project 5 miles away from us? Or even 10 miles away from us? Or even take it to another State!!! There are plenty of other routes that could be utilized. We don't want this going through our land and ruining everything. Once it is ruined, you cant get it back. We don't want this power project anywhere near our property!!
86	There are coal mines really close to where the power lines are slated to go through. This is a real danger. Don't know why that wasn't considered. I was told that there are Uranium mines in the area by my real estate agent who sold me the property. That should be researched. That cant be safe to have power lines around that. There are several other mineral mines in the area. Not a good idea to ruin them with this project. Too many things at stake. New Mexico may need them later. I would think that would be considered!
88	We need to focus on Renewable energy Transmission proposals that are not based on destroying Desert Rivers. We need to save them-- the Rio Grande and the San Pedro-- they're irreplaceable.
97	1= Need detail of the river crossings. Are the crossings going to be aerial or buried? Need the location of the poles and the arc over the river vegetation. Also need the area around the lines to see if veg must be cleared. These lines have very large structures and located far apart, which might minimize impacts, but need to see possible locations on the ground. 4=Right now, 3 new river crossings and the original river crossing have been offered. Are there any other possible crossings?

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98	National Wildlife Refuge Crossing: One of the proposed routes has two 200-foot transmission lines bracketing the west side of the Sevilleta NWR. Opening National Wildlife Refuges to private development sets a precedent that runs counter to the stated mission of the refuge system and is a major concern for those who support and value that system.
98	There are other options which have not been considered. Lines could be built to come south on the east side of White Sands Missile Range to connect with the South line. Lines could go north to connect with the Guadalupe substation. The 345 kV line could be upgraded and power moved to the four corners area which already has a good distribution network.
103	Crossing any National Wildlife Refuge sets a dangerous precedent. One of the proposed routes has two 200-foot transmission lines bracketing the west side of the Sevilleta NWR. Opening National Wildlife Refuges to private development sets a precedent that runs counter to the stated mission of the refuge system and is a major concern for those who support and value that system.
105	4) Other rational route alternatives should be considered under Component 3 in the Notice of Intent: a) If SunZia's objective is to move New Mexico's wind energy into southern and central Arizona, the Southline Transmission Project has already provided an east-west pathway that does not follow the regions last remaining natural desert river ecosystems. SunZia should consider routes located east of the White Sands Missile Range, routes that ultimately would connect to the Southline project in southern New Mexico. There is no urgent need to duplicate the function of the Southline project, particularly since Southline has surpassed SunZia in the permitting process and has avoided following the major desert river ecosystems in the region by collocating most of their transmission project with an established industrial-scale infrastructure corridor. b) If national energy policy is truly focused on replacing fossil-fueled energy with renewable energy, SunZia should consider a route that parallels Highway 60 westward from Socorro County to the large coal-fired generators located in Springerville, Arizona. This route could begin at the Rio Grande crossing that is colocated with the planned and permitted Western Spirit line. Such a route would avoid requiring amendments to the Rio Grande conservation plans associated with the Sevilleta National Wildlife Refuge and the Cibola National Forest, as well as avoid construction of a new industrial-scale infrastructure corridor parallel to both the Rio Grande and San Pedro River. This route alternative is similar in design concept to the Western Spirit Line, in that it minimizes the distance and impacts of a renewable energy tie-line by connecting to the Western Grid at the closest access point where transmission capacity is being freed up with the retirement of coal-fired energy.
105	Please include project abandonment and the two additional routes we suggested for Component 3 as analyzed alternatives in SunZia's next EIS.
106	both existing lines have significantly more narrow rights of way access than that requested by Sun Zia. Rebuilding would also force expansion of those rights of way
106	Amigos de la Sevilleta supports the 2013 EIS dismissal regarding crossing through the Sevilleta NWR, which stated that a new transmission- line ROW crossing the Sevilleta NWR would conflict with the refuge management policy and restrictions that prohibit commercial uses, as stated in the Sevilleta NWR land grant deed. We see no valid reason that the routing across Sevilleta be reinstated.
109	2. Identify and analyze a complete and reasonable range of alternatives, specifically including, at a minimum, (a) no action alternative (existing approved SunZia R-o-W grant), (b) use of one or more existing industrial or transportation R-o-Ws to accommodate the transmission needs, along with abandonment of the existing approved R-o-W grant to SunZia, (c) no river corridor alternative, (d) minimal impact to wildlife (including avoidance of wildlife refuges or placing the transmission line(s) underground through those refuges). The Federal Land Policy and Management Act (FLPMA) requires the BLM to manage the public lands in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values. The addition of new, substantial, and questionable types and levels of environmental impacts to the existing bundle of impacts analyzed in the 2015 Final EIS obligates BLM to consider a broad range of alternatives in the upcoming DEIS. Failure to analyze the alternatives outlined above, and other viable options to be determined, will reward SunZia for delaying the foreseeable planning work that made this new NEPA process and DEIS necessary.
109	4. Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. Roads cause or enable many types of environmental degradation, including significant impacts to cultural resources, topsoils, and wildlife. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources. Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soil

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115	This route is the longest of the three proposed routes, and would diverge approximately 13 miles to the west in order to avoid the Sevilleta National Wildlife Refuge (Sevilleta) and BLM specially designated areas, but would require traversing a portion of the Cibola National Forest that includes an Inventoried Roadless Area. This route would also result in the greatest amount of habitat disturbance, as it would traverse through a large area of remote relatively undisturbed habitat. This proposed route would also travel through a portion of desert bighorn sheep ( <i>Ovis canadensis nelsoni</i> ) habitat in the vicinity of Ladron Peak. The EIS should evaluate possible impacts to the desert bighorn sheep population, particularly if construction activities will occur during the rut and lambing season. Seasonal restrictions may need to be implemented, however; the Department currently lacks sufficient data on this population of desert bighorn sheep to fully assess the projects potential impacts.
115	Alternative Routes 2 and 3 The 2013 EIS had dismissed the option of crossing through the Sevilleta because the construction of a new transmission line ROW would directly conflict with refuge management policy and restrictions that prohibit any commercial uses, as stipulated in the Sevilleta land grant deed. The proposed alternative routes 2 and 3 would both cross through the Sevilleta. However; in order to avoid creating a new ROW that would be in conflict with the land grant deed, SunZia is proposing to co-locate the new transmission line with the existing El Paso Electric Company (El Paso) and Tri-State Generation and Transmission Association, Inc. (Tri-State) transmission lines. The El Paso line (route 2) is a 345kV line in a 100-ft. easement and the Tri-State line (route 3) is a 115kV line in a 50-ft. easement. SunZia is proposing a full build-out of two 500kV transmission lines, and acknowledges that due to existing easement widths, only one new transmission line could be constructed within each easement for both alternatives 2 and 3. Based on this, the full build-out of two transmission lines would have to use both alternatives 2 and 3, and not one or the other. SunZia's proposed plan to go through the Sevilleta needs to be clarified, otherwise it seems to the Department that SunZia is actually proposing two alternatives, not three.
115	The Department also recommends that EIS evaluate the option, feasibility, and the potential ecological benefits of the SunZia transmission line crossing under the Rio Grande, if it is not colocated with the Western Spirit line.
134	2) Analyze the MRG crossing above ground and underground as two separate alternatives, incorporating all impacts of each alternative. Fully detail all uncertain and unknown impacts as well as estimated benefits of any proposed mitigation to offset impacts.
134	7) Analyses of the subroutes that cross the MRG must fully analyze the cumulative impacts of collocating the crossing with Western Spirit and compare them to the cumulative impacts of adding a separate crossing. a. Defenders supports collocating the proposed transmission line with the Western Spirit transmission line to the maximum extent possible. There are likely to be significant harmful effects on migratory bird species on the MRG were subroutes 1A-2, 2A-2, 3A-2, 1A-3, 2A-3, or 3A-3 to be selected.
136	1) Viability of Co-Location & Upgrades Should be Applied to Whole Project and Entire EIS Co-locating double circuit structures with existing transmission lines is an approach that was not considered in the original SunZia EIS. This approach is new and changed information that was not considered, but should have been. Co-location has the potential to meaningfully reduce impacts and avoid or mitigate controversial aspects of the proposed action. The original EIS should be examined with this new change to see if impacts on other areas of major concern could be lessened in Arizona as well as New Mexico. Additionally, alternatives involving the upgrade of existing lines (as opposed to co-locating new SunZia lines) should be considered as another viable option for consideration. Some proposed alternatives for consideration are summarized below, though there may be others which could not be further developed due to lack of adequate comment time.
136	Northern Route Co-Location/Upgrade Alternatives -- Examine existing lines headed north towards Four Corners that could be re-built, or upgraded, combined with lines exiting Four Corners that could be re-built or upgraded to meet the same proponent objectives with lower impact. The 115kV line that is being considered for co-location south through the Sevilleta also runs north. An alternative that upgrades or co-locates that 115kV line north toward Belen and West Mesa should be examined. From West Mesa, there is an existing 230kV line towards Ambrosia to Four Corners that could be analyzed for colocation or upgrade. From Four Corners, there are different existing paths that could be explored for co-location. One path from Four Corners to Cholla to Saguaro would reach the same proposed connection point as the proposed action. Total mileage for this Northern Route Co-Location Alternative would be similar to the mileage of SunZia's proposed revised route, but 100% of that route could be built along, colocated or with upgraded existing transmission lines.

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136	Another Northern Route Co-Location Alternative would be to similarly colocate/upgrade to Four Corners, but then to co-locate/upgrade from Four Corners to Moenkopi and then to Marketplace, which would provide a direct connection to California markets. Again this alternative would be 100% along co-located or upgraded existing transmission lines. The Northern Route Co-Location/Upgrade Alternatives would not only eliminate the large amount of new corridor impacts, but could eliminate having to impact the Sevilleta, the Military, the Cascabel area, and private landowners who might be impacted by the newly proposed routes around the Sevilleta
136	2) The SunZia proposal now indicates a DC line capable of 3,000MW would be built first, a change from prior indications capable of an AC line capable of 1,500MW would be built first. If the first line is capable of 3,000MW, this questions the need for the second line and/or suggests alternatives should be considered. Why grant two 500kV AC lines at 3,000 MW total with 400-1000 feet of new disturbance, when one 500kV DC line could transmit the same amount of MW at a fraction of the impact? Reducing the scope to one 500kV line would reduce impacts significantly, at a similar capability to two AC lines.
136	4) Mavericks Area SunZia's proposed Route Modification 1--Mavericks Area is in Southline's corridor. The Southline Project has a NEPA ROD, has siting approval from the NMPPRC, and has executed ROW agreements with NMSLO, while the SunZia project does not have NMPPRC or NMSLO approval. In the NMPPRC process and in discussions leading to NMSLO agreements, the Southline alignment in the Mavericks area was adjusted to mitigate landowner impacts. As Southline is in a more advanced stage, the proposed SunZia Mavericks adjustments should be coordinated to avoid crossings of Southline. Please ensure the SunZia alignment is kept north of Southline for the benefit of all parties including avoiding multiple crossings. Please see the map below for Southline's alignment. BLM consultant SWCA should have locations of the approved Southline alignment and we hereby authorize SWCA to use that data in this area to coordinate to make sure the SunZia alignment stays north of Southline.
136	6) Coordination Opportunities An alternative for the SunZia AC line should be considered from SunZia East to the point of intersection with the EPE 345 West Mesa-Arroyo line. But, instead of looking at colocation, an alternative of connecting to and upgrading the EPE line should be evaluated. This alternative could send power south to the EPE system (with associated station upgrades) and north to Four Corners. With coordination, and Southline in service, a path westward could be provided. This option would be the most schedule-ready alternative given Southline's status and the lower level of stakeholder concerns for the SunZia East to EPE line segment. This option would eliminate new expansions through the Sevilleta and minimize new routes impacting private landowners. Combined with a Northern Route Co-Location/Upgrade Alternative (outlined above, and in diagram below), these two coordinated options could enable a similar total amount of exports for NM, in a much much lower impact fashion, and likely a shorter timeframe.
138	2.Route the lines from the wind field east then south to Southline's Afton substation, colocating as much as possible.
138	3.SunZia should consider a route that parallels Highway 60 westward from Socorro County to the large coal-fired generators located in Springerville, Arizona. This route could begin at the Rio Grande crossing that is co-located with the planned and permitted Western Spirit line and would avoid requiring amendments to the Rio Grande conservation plans associated with the Sevilleta National Wildlife Refuge and the Cibola National Forest, as well as avoiding construction of a new industrial-scale infrastructure corridor parallel to both the Rio Grande and the San Pedro River. This route alternative is similar in design concept to the Western Spirit line, in that it minimizes the distance and impacts of a renewable energy tie-line by connecting to the Western Grid at the closest access point where transmission capacity is being freed up with the retirement of coal-fired energy.
138	include other route alternatives that do not parallel our two most important remaining southwest desert riparian ecosystems.
140	I would like to see considered for Component 3--Segment 4 reroute: 1) The effect of increased route length (materials required for construction of the line, amount of new roads required, etc.)
140	Impacts I would like to see considered for Component 3--Segment 4 reroute: -The effect of this project on the management of the Sevilleta NWR for the health of wildlife and the Rio Grande ecosystem.
140	Impacts I would like to see considered for Component 3--Segment 4 reroute: Possible disruptions to the aesthetics, livability, and community cohesion of existing small communities along the route due to effects of construction and operation of transmission lines.
140	I would like to see evaluation in the EIS of the need for this project, and the possible other ways of providing for our electrical needs through on-site generation and reductions in electricity consumption.



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141	We also note that the amendments proposed in the Notice of Intent include a large amount of road construction, both permanent maintenance access roads and temporary construction access roads. The construction and maintenance of these roads were not analyzed in the 2013 EIS, of course, because the line was going to be constructed along a different path. The impact of road construction and maintenance must be fully addressed through the lens of landscape and wildlife corridor fragmentation, ground and surface water interaction, and full cultural artifact surveys. This project also demands historic surveys of the area to determine the presence of and protect cultural and historic artifacts, particularly due to the proximity of the Camino Real and Jornada del Muerto.
141	The BLM should analyze a route that would construct the SunZia transmission line parallel to and in the same disturbance area as Highway 60, east-west, and parallel to and in the same disturbance area as I-25, north-south. This alternative would provide the most minimal impact possible to Sevilleta, the Sierra Ladrones Wilderness Study Area (WSA), and a citizen inventoried land with wilderness characteristics (LWC) just west of Sierra Ladrones. This citizen inventoried LWC is in the southern Sierra Lucero, just west of the Sierra Ladrones WSA, and totals about 10,700 acres without any structures or roads beyond a couple of fences that do not negatively impact the apparent naturalness of the area. Utilizing already disturbed areas whenever possible would better serve to limit the environmental and destructive impacts of construction and operation of this transmission line, and ought to be considered fully alongside the more disruptive alternatives across the Sevilleta and the Sierra Ladrones.
141	Underground or Overhead Construction At several points during the planning of SunZia segments have been planned or mitigation measures have been offered which would put the line underground for certain strategic segments of line. Before BLM and cooperating agencies accept burying the line as a measure to mitigate the number of avian injuries and deaths, the associated resource impacts on ground and surface water, cultural artifacts, road construction, and land-based wildlife must be fully addressed and analyzed. There are pros and cons to both burying the line and suspending it overhead, but BLM and the cooperating agencies must fully analyze these pros and cons before making a decision.
141	Of the alternative routes proposed in the scoping documents, New Mexico Wild strongly supports a no action alternative that would retain the proposed route of the 2013 EIS and 2015 ROD. We note that opting for the no action alternative early in the process would save the BLM and cooperating agencies tremendous amounts of resources and would allow for the project proponent to begin construction far earlier.
142	2. Socorro County Road A-125 is a one-and-a-half lane dirt road that winds through a rugged canyon and across many arroyos. It is the most direct access to Highway 60 for the residents living south of the proposed Segment 4 Reroute, and it is our only access to Highway 60 when weather/mud renders the other access road, B-127, impassable. In essence, it is our lifeline, and it cannot be jeopardized by increased usage from transmission line construction and maintenance activities.
145	a location closer to Interstate 25 is more feasible and practical because that area is more heavily trafficked and, upon information and belief, will be less costly to SunZia.
146	If the project must go on, I recommend that you can go through White Sands and bury your lines that way, so why not do that. It is already approved.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
147	We would also urge that in general, the preferred path for the power line as it then moves south through New Mexico be sited as far from the river corridor as possible.
150	I believe the transmission lines should be buried beneath the Rio Grande and its flood plains.
150	The transmission line will have a negative visual impact, will cause the unnecessary deaths of many birds, decrease economic values along the river and discourage tourism in these very unique environments. To minimize the environmental and economic impact, the lines need to be buried.
153	According to other groups who similarly object to the proposal, alternatives other than those that favor SunZia's permit quest should be analyzed in order to make informed decisions about new sets of amendments that would cause even greater ecological impacts than documented in previous EIS processes.

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153	2.) Other rational route alternatives should be considered under Component 3 in the Notice of Intent: a. If SunZia's objective is to move New Mexico's wind energy into southern and central Arizona, the Southline Transmission Project has already provided an east-west pathway that does not follow the regions last remaining natural desert river ecosystems and other untouched areas. SunZia should consider routes located east of the White Sands Missile Range, routes that ultimately would connect to the Southline project in southern New Mexico. There is no urgent need to duplicate the function of the Southline project, particularly since Southline has surpassed SunZia in the permitting process and has avoided following the major ecosystems in the region by co-locating most of their transmission project with established industrial-scale infrastructure corridors.
157	Avoiding harm: We commend the BLM and SunZia for the 2015 siting decision that avoids a proposed route through Aravaipa Canyon (Subroutes 4A and 4B), which would have had the greatest harm to Arizona's irreplaceable wild lands. Along the chosen route through Arizona, however, we remain concerned about impacts to irreplaceable environmental and cultural values in the San Pedro River valley. By choosing this highly problematic alignment, BLM and SunZia have exacerbated the ongoing controversy around approval and construction of this transmission line, and have increased the need for other mitigation measures.
157	Minimizing damage: In sensitive areas along the chosen route, we appreciate SunZia's efforts to identify technologies that minimize impacts to conservation values, e.g. the use of taller towers and helicopters for line deployment where the line crosses the San Pedro River, which reduce the need to remove stream-side forests and other important riparian habitat. However, we remain concerned about the impacts of other construction and maintenance activities; these concerns are amplified by the current proposal to expand the construction footprint beyond what was approved in the EIS, and make many miles of road permanent rather than temporary. Roads are widely considered to be one of the major sources of habitat and watershed degradation, especially in semi-arid areas. The description of the amendment to keep access roads permanent after construction indicates a very large footprint (709 miles) but does not indicate where the new segments will be located and thus doesn't contain enough information to enable analysis of impacts or comparison of alternatives. In the forthcoming EIS process, we ask that SunZia and BLM provide detailed maps showing where new and existing roads are located, and analyze a full range of alternatives for constructing and managing these roads. NEPA analyses will need to look at both initial impacts and ongoing effects through time (e.g. from erosion, spread of invasive plants, and proliferation of spur roads, interruption of wildlife corridors, and generally expanded public access to areas where remoteness formerly served to protect natural and cultural resources); cumulative effects with other foreseeable activities; and interactions with other transportation and land management plans (including RMPs and Travel Management Plans of all BLM and USFS units, habitat management areas and hunting units, grazing leases on federal and state lands, and cultural resource protection strategies). Without detailed information about where temporary and permanent roads and expanded Right of Ways would be located, these kinds of impacts cannot be analyzed, and stakeholders cannot provide informed input on alternatives
158	Recommendation 4: If the BLM does not reject the new request as being unnecessary, since there is an approved plan and thus no need for rerouting, then the BLM should consider looking at alternate routes other than the ones identified currently in Component 3 Alternates 1,2, and 3, which impact protected areas on public lands as well as a private community. Those routes should follow established infrastructure corridors and right of ways such as I-25, or train tracks and stay away from federally protected areas
158	Recommendation 7: The BLM should look at the possibility of burying the high tension lines in sensitive areas along all routes or look at other means to minimize environmental impact in any of the potential route options past and future.
158	Recommendation 9: The BLM should deny the request for Component 3 Alternate 1, the Route around Ladron that goes through the community of Santa Rita Ranches. This route is very damaging to the environment due to its extra length compared to other routes studied or under study.
158	Recommendation 12: The BLM should deny the request for Component 3 Alternate 1. There are many threatened and endangered animal species along or near this path. If the BLM continues to view this as an option, then the BLM should determine with field surveys, like those described in Recommendation 11, whether or not any of these threatened and endangered species are in or near to the impact path of the transmission lines and determine what impact if any the project would have on their habitat, the corridors they travel, and what other effects these placement of these towers and transmission lines would have on them and other animals in that area, including increasing landscape resistance near the towers. Particular attention should be paid to raptors and other birds that might come in proximity to those lines, which may do them harm. Desert Bighorns are doing well in the area. It should be determined if the transmission lines would impact them or change the landscape resistance restricting their freedom of movement. Having seen bear tracks, mountain lion tracks, and knowing that there are wolves not too distant, particular care should be taken to ensure that there is not a detrimental effect on them. This is especially true for the Mexican wolves, which are extremely endangered. The comment would also apply to other paths under consideration, present paths and future paths.

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158	<p>Recommendation 13: The BLM should deny the request for Component 3 Alternate 1. Along or near this path there are many threatened and endangered plant species. If the BLM continues to view this as an option, then the BLM should determine with field surveys, like those described in Recommendation 11, whether or not any of these threatened and endangered plants are in or near to the impact path of the transmission lines and determine what impact if any the project would have on their habitat. Important Plant Areas 54-Rio Salado at Riley, 55-Rio Grande at Belen, 56-Sevilleta Basin, and 142-Socorro and Strawberry Peaks to name a few. Special care must be made in all these areas to preserve and protect endemic plants. The general comment would also apply to other paths under consideration, present paths and future paths.</p>
158	<p>Recommendation 14: The BLM should deny the request for Component 3 Alternate 1. The nearly pristine acreage consumed by this path and the elevation changes along this path are significant. Due to this topography, the chance for erosion, permanent damage to terrain and vegetation is significant. Through soil erosion, this could introduce additional silt into the riparian environment of the Rio Salado and the Rio Grande. If the BLM continues to view this as an option, then the BLM should hire an outside consultant to review this route and not rely on SunZia to perform the route engineering unchecked. SunZia has a conflict of interest. The BLM should engage an environmental engineering firm that has subject matter expertise in construction of transmission towers to address risks and shortcomings in the SunZia designs, evaluate those designs for environmental impact, and offer corrective actions, which should be conditions of any grant of permission for the route. The comment would also apply to other paths under consideration, present paths and future paths.</p>
158	<p>Recommendation 16: The BLM should deny the request for Component 3 Alternate 1. It introduces potential health and safety risks to people, animals, and vegetation along or near this path. This is especially true with respect to the community of Santa Rita Ranches which the lines will traverse. Studies have raised concern about the negative effects of EMF. There is a lot of debate about this matter, but erring on the side of caution because of yet unknown discovered effects should be the BLMs position. High voltage power lines can induce currents in metal structures, which could be harmful, or in the case of water tanks on this route, could prevent animals from obtaining life giving resource A survey should be formed regarding what is in the path of the towers that could be affected detrimentally from a health and safety perspective. The survey comment would also apply to other paths under consideration, present paths and future paths.</p>
158	<p>Recommendation 17: The BLM should deny the request for Component 3 Alternate 1. Due to the fact that people will live near these transmission lines in the community of Santa Rita Ranches, a community without a local water supply to fight fires. If a fire started related to the transmission lines from contact with vegetation, equipment failure, or conductor slap, were to start, there would be no easy way to fight the fire and fighting the fire near transmission towers is problematic. If despite this safety concern to life the BLM continues to view this as an option, then the BLM should conduct a study to understand how to mitigate the potential effects of a wildland fire in the proximity of these transmission lines. The comment regarding the study would also apply to other paths under consideration, present paths and future paths.</p>
158	<p>Recommendation 18: The BLM should deny the request for Component 3 Alternate 1. The Riley (Santa Rita) town and Santa Rita Ranches community is a class 2 on the Bortle Dark Sky Scale. Any ambient light that would be created by these towers would be a form of light pollution that would degrade the visual resources of this area as a dark sky area. Additionally, the communities are also extremely quiet and the transmission lines could increase the ambient noise. This form of noise pollution can also have detrimental health effects. Additionally, transmission lines can emit EMI which can affect electronics in the form of noise. Notification should be provided to the National Radio Astronomy Observatory Very Large Array (NRAO VLA). Radiotelescopes like those at the VLA are susceptible to EMI. If the BLM continues to view this as an option, then the BLM should hire an outside consultant to review the SunZia design and ensure they are taking steps in their design to mitigate the effects of light, noise, and EMI and not rely on SunZia to perform the design engineering unchecked. SunZia has a conflict of interest. The BLM should engage an environmental engineering firm that has subject matter expertise in construction of transmission towers to address risks and shortcomings in the SunZia designs, evaluate those designs for mitigations to address the light, noise, and EMI, issues and other factors discovered, then offer corrective actions, which should be conditions of any grant of permission for this route. The comment regarding the study would also apply to other paths under consideration, present paths and future paths.</p>
159	<p>WSMR would like to ensure DoD's national security concerns regarding the SunZia project are addressed. a. The 2016 Record of Decision (ROD) issued for the Final Environmental Impact Statement (EIS) authorizing a Right-Of Way (ROW) for the SunZia transmission line across the NCUA is a significant concern as DoD assesses the test range infrastructure needed to support the emerging technologies and systems identified in the 2018 National Defense Strategy (NOS). b. On December 3, 2018 the former Assistant Secretary of Defense Robert H. McMahon issued a letter to the MMR Group, Inc. reiterating DoD's concerns and indicating that re-routing the transmission line out of the NCUA would significantly benefit capabilities at WSMR by enhancing use of the NCUA for testing of future systems.</p>

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159	2. Strategic National Defense efforts have escalated since August 13, 2018, when the President signed the National Defense Authorization Act (NOAA) of 2019, which makes the development of Hypersonic systems one of the nation's top priorities. a. The 2018 NOS addresses modernizing key capabilities: Hypersonic, Integrated Air and Missile Defense, and Advanced Autonomous Systems (including Unmanned Aerial Vehicles), all requiring long range testing in the next 3-6 years. b. Critical National Security capabilities encompassing the DoD and Army priorities in Air and Missile Defense, Long Range Precision Fires, Directed Energy, Hypersonic and Autonomous systems depend on the Land, Airspace and Frequency-space that comprise WSMR for performance testing, threat exploitation and training in a realistic battlespace at tactical ranges. c. Aerial transmission lines in the NCUA would impede our ability to provide realistic operational environments including very-low-altitude test-flight profiles for, missiles, drones and other unmanned vehicles and to adequately replicate the advancing threats of our adversaries.
159	WSMR has prepared Environmental Assessments (EAs) since the date of the Final SunZia EIS in 2016 that will be of interest to your project. These are related to the ongoing test and evaluation of long range weapon systems within the NCUA. a. Theater High Altitude Area Defense (THAAD) Initial Development Program, 1994. This established a Launch Complex in the NCUA. b. Supplemental Environmental Assessment for Lee Impact Area, New Mexico, 2016. This EA adds the testing and evaluation of extended range capability of Precision Fires or similar unitary missiles. c. Environmental Assessment for Advanced Gunfire, 2018. Established the need to develop and mature the science and technologies supporting hypervelocity projectiles and future naval electromagnetic Railgun weapon systems. This EA used a newly established impact area in the NCUA. d. Environmental Assessment for Extended Range Capabilities, 2018. This EA establishes temporary airspace corridors into the NCUA restricted airspace for use in long-range Launch Test Article Testing (LTAT). Low flying systems would use airspace corridors over portions of Valencia, Bernalillo, and Torrance Counties north of the WSMR NCUA. Additionally, potential ground disturbance associated with target intercept test operations over a temporary debris impact area (1,000 acres) in the NCUA. e. Environmental Assessment for Precision Fires Rocket and Missile Systems Flight Testing from Fort Wingate Launch Complex, 2020. Test activities include launching missiles from the Precision Fires Rocket and Missile Systems family of missiles from Fort Wingate Launch Complex to WSMR in order to test the extended range capability of the missile. f. Environmental Assessment for Solid Fueled Rocket Motor Launches from Fort Wingate Launch Complex, 2018. Launch long range targets out of Fort Wingate Launch Complex to WSMR in support of a layered defense system.
159	WSMR is a tri-service installation operated by the Army, under the responsibility of the Secretary of the Army, with Deputies representing the Navy and Air Force and all three having future emerging needs to test extended long range weapon systems. WSMR provides Holloman, Kirtland, and Cannon Air Force Bases (AFBs) air space and range operations for training, special air operations and other missions. The Department of the Air Force issued a ROD in March 2021 for the EIS to implement actions to achieve Special Use Airspace (SUA) optimization for Holloman AFB, which may be of interest for the project.
159	The Army, Navy and the Air Force have future emerging needs to test extended long range weapon systems. A Programmatic Environmental Impact Statement (PEIS) is in the early stages to develop long range overland flight corridors from locations within the Continental United States terminating at WSMR in support of future long range weapon system testing demand, including hypersonic testing. The proponent is the DoD Test Resource Management Center. The ROD for this PEIS is estimated FY 2024, enabling usage beginning in FY 2025. The point of contact is Mr. Gabriel Saldivar, Acting Director, Strategic Technical Initiatives, gabriel.saldivar.civ@mail.mil, (575) 678-2937 or Ms. Catherine L. Giblin, Environmental Engineer, Materiel Test Directorate, catherine.l.giblin.civ@mail.mil, (575) 678-3541
163	I have serious concerns about all three options for reroutes discussed under Component 3, and urge you to choose a no action alternative that would return to the original route evaluated in the 2013 Environmental Impact Statement (EIS).
163	The Rio Grande Corridor is a keystone flyway for hundreds of migratory species, including raptors, water birds, and others. It is also home to many rare and endangered species. The tall transmission lines (in addition to construction activity) in Proposed Reroutes 2 and 3 will significantly impact the Rio Grande Corridor. The BLM and cooperating agencies would need to conduct a thorough analysis of the impacts of such transmission lines on birds in a new EIS.
163	I strongly support a no action alternative that would retain the proposed route of the 2013 EIS and the 2015 Record of Decision (ROD). Ideas for placing the transmission line underground could be resurrected and analyzed to address concerns of the White Sands Missile Range (WSMR). This would not only avoid the impacts discussed above but would save very significant amounts of time and money for the BLM and other cooperating agencies.

Submission Number	Comment Text
163	If the no action alternative is not acceptable, there is a fourth alternative: rather than crossing the Sevilleta National Wildlife Refuge or going around the Sierra Ladrone WSA and cutting it off from nearby ACECs and the Bear Mountains, a route that bypasses the White Sands Missile Range to the north, then parallels the I-25 corridor should be thoroughly analyzed. It could connect into the original route evaluated in the 2013 EIS when it crosses I-25 at Escondido. Since such a route would clearly mitigate concerns about impacts on the WSMR as well as the Sierra Ladrone WSA, the Sevilleta National Wildlife Refuge, and other protected areas, I'm baffled that such an option was not already considered.
165	here are a number of recommendations submitted [in Larry Wharton's comment letter]. Of particular impact are the Implementation of Recommendations 2,3,4,6,12,13,14,15,17 and 18. Recommendation #6 is especially notable. {SWCA note: recommendation 6 is to select routes through USFWS where existing T lines exist]
165	The Lower San Pedro Watershed Alliance presents several recommendations. Recommendation #4 is particularly relevant to New Mexico. Please consider its implementation. [note from SWCA- #4 is create a new route following existing linear disturbance]
167	There is no master plan at the State of NM level for establishing ecologically sound guidelines for the proper transfer of power across sensitive zones in NM.
167	There is no master plan at the State of NM level for establishing ecologically sound guidelines for the proper transfer of power across sensitive zones in NM. The visual pollution of these lines is also of concern- they may transfer green power, but they are ugly. Their electromagnetic fields (EMFs), may affect bird life and the navigational ability of bees. Valencia and Socorro Counties appear to be the current targets for a spiderweb of transmission lines. Worse, each power line installation company seems to be pursuing its own route to cross the river before continuing south. This practice cuts up more of the landscape and pits landowners against each other. The fear of an eminent domain action lurks in the background for those who are not interested. Shouldn't the various private power companies and the State and Federal agencies concerned be able to plan one or two well designed and attractive corridors where more than one company's lines can parallel and cross a sensitive area such as the Rio Grande? We have been told that other states, such as California, have put lines underground for some distances at a reasonable cost. The power line company reps who have attended public meetings in Valencia and Socorro counties poo-poo this. But some extra cost may be worth it in terms of a better overall plan. What are some specific examples of technology and cost for underground placement in other states that BLM and other agencies can look at?
167	We have been told that other states, such as California, have put lines underground for some distances at a reasonable cost. The power line company reps who have attended public meetings in Valencia and Socorro counties poo-poo this. But some extra cost may be worth it in terms of a better overall plan. What are some specific examples of technology and cost for underground placement in other states that BLM and other agencies can look at?
170	There's alternative routes now through Torrence County up to Valencia County, they got our lines going across the road. There's a good alternative.
171	During this scoping process, please be open to expanding the geographic scope of this EIS to additional segments of the route as well. Specifically, I am most concerned about the segment that traverses the San Pedro River Valley. It is my opinion that these lines are improperly sited in Arizona. The BLM should expand the purview of the current EIS to include route alternatives that avoid the San Pedro River Valley. Alternatively, I encourage the BLM to deny this permit altogether, given the environmental damage that would be caused by the project as a whole.
172	This project should be denied on their application. And instead establish a utilities corridor through the state directly to the end users. This corridor would be in the national security interest as it would be easily monitored, expanded with growth, maintained and protected. Thank you for your consideration.
176	The protection of the Rio Grande Migratory Corridor is of such paramount importance that we cannot begin to consider the pros and cons of the alternative routes without first considering the alternative means of crossing this critically important flyway. The Rio Grande Return board of directors and staff insist that all alternative routes must fully consider both overhead and underground alternatives to crossing the Rio Grande Corridor. Further, we insist that all alternatives include mitigation measures based on robust scientific data that establishes the cumulative impacts of both overhead and underground alternatives to a full range of birds, bats, and other wildlife that utilize this continentally important migratory corridor.
184	According to other groups who similarly object to the proposal, alternatives other than those that favor SunZia's permit quest should be analyzed in order to make informed decisions about new sets of amendments that would cause even greater ecological impacts than documented in previous EIS processes.

Submission Number	Comment Text
184	2.) Other rational route alternatives should be considered under Component 3 in the Notice of Intent: a. If SunZia's objective is to move New Mexico's wind energy into southern and central Arizona, the Southline Transmission Project has already provided an east-west pathway that does not follow the regions last remaining natural desert river ecosystems and other untouched areas. SunZia should consider routes located east of the White Sands Missile Range, routes that ultimately would connect to the Southline project in southern New Mexico. There is no urgent need to duplicate the function of the Southline project, particularly since Southline has surpassed SunZia in the permitting process and has avoided following the major ecosystems in the region by co-locating most of their transmission project with established industrial-scale infrastructure corridors. b. If national energy policy is truly focused on replacing fossil-fueled energy with renewable energy, SunZia should consider a route that parallels Highway 60 westward from Socorro County to the large coal-fired generators located in Springerville, Arizona. This route could begin at the Rio Grande crossing that is co-located with the planned and permitted Western Spirit line. Such a route would avoid requiring amendments to the Rio Grande conservation plans associated with the Sevilleta National Wildlife Refuge and the Cibola National Forest, as well as avoid construction of a new industrial-scale infrastructure corridors parallel to both the Rio Grande and San Pedro River. This route alternative is similar in design concept to the Western Spirit Line, in that it minimizes the distance and impacts of a renewable energy tie-line by connecting to the Western Grid at the closest access point where transmission capacity is being freed up with the retirement of coal-fired energy.
184	4.) Impacts and cumulative effects to all resources in New Mexico and Arizona affected by the requested amendments must be re-analyzed from what was memorialized in SunZia's original EIS, particularly with regard to additional lands sought for construction staging, permanent access roads, new route alternatives, and new substations. Given the magnitude of miles/acreage of additional permanent access roads, miles/acreage of each new route alternative, and the fact that the former EIS is a critical part of the evidentiary basis for seeking state permits, a comprehensive table of all proposed changes that were not analyzed in the first EIS should be prepared, followed by a detailed analysis of additional impacts associated with these changes, including changes that were not disclosed in the recent Notice of Intent.
184	If that is not possible, minimize the impacts on vulnerable communities and ecosystems across New Mexico and Arizona by returning to one of the previously approved and authorized route(s) through the White Sands Missile Range (WSMR) or the two alternate paths through the Sevilleta National Wildlife Refuge, which use existing rights-of-way and therefore would make less of an impact along undeveloped routes and pristine properties across New Mexico and Arizona.

## IMPACT ANALYSIS AND MITIGATION COMMENTS

### Reasonably Foreseeable Environmental Trends and Planned Actions Comments

Submission Number	Comment Text
7	The matter of precedence: how these lines are constructed and where they are located will most likely lead to other lines crossing the river at the same location, it will become an energy transmission corridor and should be located and built with that consideration in mind.
14	3.How many more SunZia lines can be added in the future?
17	how these lines are constructed and where they are located will most likely lead to other lines crossing the river at the same location, it will become an energy transmission corridor and should be located and built with that consideration in mind.
28	Finally, I ask that the precedence this line could set be considered: how these lines are constructed (above or below ground) and where they are located could lead to other lines crossing the river at the same location, magnifying the impact of the decision now at hand.
44	The EIS also must fully explore environmental justice issues, including how building this line will invite the construction of other lines in the same area, turning this rural area into an energy transmission corridor to benefit out-of-state interests at the expense of low-income local communities.

Submission Number	Comment Text
80	Another company is proposing another transmission line. I fear the SunZia project will set a precedent. How transmission lines are constructed and where they are located will most likely lead to other lines crossing the river at the same location. It will become an energy transmission corridor and should be located and built with that consideration in mind. So instead of being a corridor for over 400 species of birds, our valley could turn into an industrial site, obliterating its great natural value for humans, birds, and other wildlife.
81	... the majority of the 514-mile line would run west and then south near New Mexico's Rio Grande Valley. This is an industrial scale proposed project that would industrialize the entire length from Lincoln, Torrance, and surrounding counties all the way through a large portion of the Rio Grande Valley of New Mexico. This industrialization is already happening in Torrance and surrounding counties without the SunZia project. Land use along Highway 54 between Duran and Corona New Mexico has gone from a natural area used for sustainable ag and national forest to a MASSIVE industrial park with roads, huge scars on the land, industrial traffic on two lane roads and a sea of "in your face" wind turbines on every part of the landscape. The SunZia project would only encourage and greatly enable this industrialization to occur. New Mexico BLM should not offer New Mexicans to any bidder, sparing the prime outside beneficiaries of this project from the impacts of scarred land, interruptions or cessation of ag uses and tourism and all the other collateral damage to wildlife and forest land that has been proven to occur. These proposed lines go through areas of great natural beauty and wildlife areas. Southern NM has gone to great lengths to preserve some of their lands, but this proposal defaces and permanently ruins a good deal of what is left. The BLM is involved in several projects including SunZia that will greatly impact New Mexico's future. The cumulative impact on New Mexico of the proposed SunZia project along with other related projects will be huge and irreversible.
81	What is the overall cumulative and permanent impact of the SunZia project on the environment, economy, and quality of life from the impacted lands that have previously been preserved?
98	Wherever the lines go, that area will likely become an energy corridor. This area was not considered a good energy corridor in the West Wide Energy corridor study except to acknowledge that if the SunZia transmission lines were built it would become an energy corridor.
105	While SunZia attempts to salvage their cash investment in various permit quests, conservationists continue to point out that the project has a basic flaw with its design concept that would cause continuously increasing and permanent adverse impacts to both of the major desert river ecosystems in the region. If this new industrial-scale infrastructure corridor is established, it will attract additional linear infrastructure proposals to the same corridor in the future.
105	2) Impacts and cumulative effects to all resources in New Mexico and Arizona affected by the requested amendments must be re-analyzed from what was memorialized in SunZia's original EIS, particularly with regard to additional lands sought for construction staging, permanent access roads, new route alternatives, and new substations. Given the magnitude of miles/acreage of additional permanent access roads, miles/acreage of each new route alternative, and the fact that the former EIS is a critical part of the evidentiary basis for seeking state permits, a comprehensive table of all proposed changes that were not analyzed in the first EIS should be prepared, followed by a detailed analysis of additional impacts associated with these changes, including changes that were not disclosed in the recent Notice of Intent, such as new lighting requirements by the Federal Aviation Administration.
134	7) Analyses of the subroutes that cross the MRG must fully analyze the cumulative impacts of collocating the crossing with Western Spirit and compare them to the cumulative impacts of adding a separate crossing. a. Defenders supports collocating the proposed transmission line with the Western Spirit transmission line to the maximum extent possible. There are likely to be significant harmful effects on migratory bird species on the MRG were subroutes 1A-2, 2A-2, 3A-2, 1A-3, 2A-3, or 3A-3 to be selected.
136	5) Cumulative Impacts The original 2013 SunZia EIS did not include or analyze Southline as a reasonable foreseeable future action. Since the original 2013 SunZia EIS, Southline's permitting has advanced ahead of SunZia's with a NEPA ROD, NM State Siting approval, and NMSLO approval. Southline now needs to be included in the SunZia EIS analysis for Cumulative Impacts
141	Above and beyond the independent analyses called for in this comment, the BLM must analyze the cumulative impacts including continued dependence on fossil fuel-fired power plants, as well as the expected construction and operation of renewable energy projects to serve the capacity of the SunZia transmission line. While the purpose of the SunZia Southwest transmission line is to transport primarily renewable energy, the use of the word primarily suggests that fossil fuel-derived energy will also be transported. BLM and cooperating agencies must determine to what extent fossil fuel-derived energy will be supported by the construction and operation of this transmission line, and analyze the impacts therefrom

Submission Number	Comment Text
144	BLM must also consider cumulative impacts from the many types of development along the SunZia route that could be facilitated by a new line in these areas, for example, potential fossil fuel plants (which could undermine any GHG benefits from new renewable energy sources) and sprawl housing developments in remote areas that would impact scarce water resources and other resources.
147	This placement will also have impacts on the quality of experience for users of the Rio Grande Trail, a long distance trail that follows the river through New Mexico from the Colorado to the Texas Border. The building of this trail is in progress and it promises to provide users with a tapestry of diverse natural habitats and striking landscapes while contributing to the economic prosperity of the surrounding counties. Placing the power line and its enormous towers over the river where they can be seen for miles will industrialize the area and degrade that experience. Plus, in the future, other power lines may follow in a similar path adding to this degradation. Burying the line so that it crosses under the river is technologically feasible and will eliminate all of these problems.
176	The protection of the Rio Grande Migratory Corridor is of such paramount importance that we cannot begin to consider the pros and cons of the alternative routes without first considering the alternative means of crossing this critically important flyway. The Rio Grande Return board of directors and staff insist that all alternative routes must fully consider both overhead and underground alternatives to crossing the Rio Grande Corridor. Further, we insist that all alternatives include mitigation measures based on robust scientific data that establishes the cumulative impacts of both overhead and underground alternatives to a full range of birds, bats, and other wildlife that utilize this continentally important migratory corridor.
184	4.) Impacts and cumulative effects to all resources in New Mexico and Arizona affected by the requested amendments must be re-analyzed from what was memorialized in SunZia's original EIS, particularly with regard to additional lands sought for construction staging, permanent access roads, new route alternatives, and new substations. Given the magnitude of miles/acreage of additional permanent access roads, miles/acreage of each new route alternative, and the fact that the former EIS is a critical part of the evidentiary basis for seeking state permits, a comprehensive table of all proposed changes that were not analyzed in the first EIS should be prepared, followed by a detailed analysis of additional impacts associated with these changes, including changes that were not disclosed in the recent Notice of Intent.

### Mitigation (non-resource-specific) Comments

Submission Number	Comment Text
141	Additionally, if an alternative is chosen that would construct the line through Sevilleta, we expect significant offsets in the final EIS and record of decision to ensure that any impacts suffered upon the refuge and its inhabitants do not result in population decline of any avian species. We welcome the opportunity to discuss our concerns with BLM and cooperating agencies as the NEPA process continues, and request that this comment be included in the project record.
147	Additionally, given the 30 x 30 initiative to conserve 30% of our wild lands by 2030 to protect biodiversity, placing these large power line structures in such important river habitat is a step in the wrong direction. In the past, SunZia offered to purchase habitat in the area and set it aside for wildlife as a way to mitigate impacts of its power line. But, because the migratory birds using the river in winter don't breed in the area, to be useful to replace birds killed by the power line, this land would need to be in northern nesting areas and not in the middle Rio Grande Valley leaving the river corridor impaired.
157	We encourage BLM and SunZia to proactively consider a broader set of mitigation measures in this amendment than were mandated by the 2015 Right of Way approval.
157	To maximize benefits and minimize harms from projects such as this, The Nature Conservancy advocates for a comprehensive mitigation hierarchy approach that seeks to avoid impacts to areas with the greatest and most irreplaceable ecological value; minimize impacts to sites chosen; and offset (compensate for) the remaining unavoidable impacts by investing in a comparable amount of conservation benefits elsewhere. This approach closely matches federal guidance in 40 CFR1508.2.



Submission Number	Comment Text
157	Offsetting unavoidable impacts: Overall, we find the mitigation offsets described in the original 2013 EIS and the 2016 ROW grant processes to be inadequate to adequately compensate for unavoidable impacts. The 2016 ROW, for example, only required offsets for a small number of acres in Designated Critical Habitat of federally listed Endangered Species. These handful of acres represent a tiny fraction of the acres that will be exposed to watershed disturbance and habitat degradation from construction and maintenance of this powerline and its associated infrastructure. Our 2015 letter to the Arizona Corporation Commission describes these un-mitigated impacts in detail. This amendment is an opportunity to evaluate a broader suite of potential mitigation measures, from avoidance to offsets. Specific to road impacts, adding permanent road miles and an expanded footprint to the right-of-way would cause additional ongoing impacts; this network should be examined for least-harm alternatives, and then considered in offset calculations. These impacts will be cumulative to impacts of the road network and construction footprint already described in the 2015 EIS. Because habitat/watershed degradation often has non-linear effects, the most robust approach for this amendments NEPA process would be to conduct an analysis of mitigation options for the full set of roads, construction disturbance, and other infrastructure not just the most recent proposed changes.
167	At some point, installing more long distance transmission lines will become obsolete. As solar becomes cheaper and battery technologies advance, long distance lines will become outdated hazards. In signing contracts with the power line companies, have those companies agreed in writing to set aside for perpetuity, a fund for the dismantling of these structures when the time comes? Or should the State (and Federal agencies) set aside a salvage cost for dismantling them?

## Air Resources Comments

Submission Number	Comment Text
153	On still days, this area of the Southwest is some of the purest there is. Historically, it was even sometimes called the well country for sufferers of tuberculosis and other lung ailments who moved to sanitariums, especially in New Mexico, to breathe easier in the fresh, dry air. Tests increasingly show that a buildup of static electricity around power lines attracts particulates in the air and carries them to the area, where they accumulate. This problem is made worse if power lines are located close to other sources of pollution (like the many sources inherent to large-scale construction sites). Pollutants are often made up of a mixture of contaminants that can then become charged by the electricity running through the power lines. In turn, breathing in charged particles has been linked to many adverse health effects, including cancer. How will SunZia and/or the BLM safeguard the populations in these areas, human and otherwise?
158	Air quality Similar to the comments in the paragraph regarding water resources, the transmission lines would not be a major factor in reduction in air quality, but corona discharge can lead to the generation of the detrimental type of ozone O3 as well as NOx . Ground level ozone is an air pollutant and can interact with other chemicals in the air and contribute to smog. Elevated ozone can affect growing vegetation <sup>15</sup> further exacerbating the destruction of the localized landscape near these towers
184	Climate and Air Quality. On still days, this area of the Southwest is some of the purest there is. Historically, it was even sometimes called the well country for sufferers of tuberculosis and other lung ailments who moved to sanitariums, especially in New Mexico, to breathe easier in the fresh, dry air. Tests increasingly show that a buildup of static electricity around power lines attracts particulates in the air and carries them to the area, where they accumulate. This problem is made worse if power lines are located close to other sources of pollution (like the many sources inherent to large-scale construction sites). Pollutants are often made up of a mixture of contaminants that can then become charged by the electricity running through the power lines. In turn, breathing in charged particles has been linked to many adverse health effects, including cancer. How will SunZia and/or the BLM safeguard the populations in these areas, human and otherwise?

## Climate Change Comments

Submission Number	Comment Text
3	Has anyone done a cost benefit analysis analyzing the costs and negative impacts of the transmission line with the costs and positive benefits of an equal amount of capital deployed into a carbon capture venture?
16	Not only will the SunZia line address this need and bring thousands of megawatts of renewable power online, it will also reduce millions of tons of greenhouse gas emissions from being emitted into our atmosphere and do its part in mitigating worsening impacts caused by climate change.
24	Large overhead structures can be more vulnerable to weather-related events. Global climate change caught Texas by surprise this spring, freezing infrastructure and causing massive loss of power and bringing suffering to customers. What measures will be taken to protect the lines from extreme weather events not experienced in the past and prevent dangerous conditions for communities in their wake?
77	We advise BLM to proceed deliberately to close the gap between management of BLM lands and scientific studies of climate change by actively integrating available research results into land management plans, practices, and decisions. 3 U.S. courts are now consistently doing something they were not doing in 2015: upholding requirements for BLM and other federal agencies to consider the Climate Crisis in their decision regarding land alterations. <sup>4</sup> SunZia must not be excused from rigorous analysis and evaluation of its Climate Crisis impacts (and benefits) simply because it links renewable energy sources and major markets.
77	Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soils.
77	The Climate Crisis and the now-confirmed and still-escalating types and levels of environmental change in the SunZia impact area mean that all baselines used in the 2015 FEIS must [be] reconsidered and the proposed action must be completely re-analyzed.
109	As duty-bound trustees for public lands and interests, BLM and other U.S. Government agencies are charged with taking all practical steps to address the Climate Crisis and enable climate change adaptation. We advise BLM to proceed deliberately to close the gap between management of BLM lands and scientific studies of climate change by actively integrating available research results into land management plans, practices, and decisions. 3 U.S. courts are now consistently doing something they were not doing in 2015: upholding requirements for BLM and other federal agencies to consider the Climate Crisis in their decision regarding land alterations.
109	SunZia must not be excused from rigorous analysis and evaluation of its Climate Crisis impacts (and benefits) simply because it links renewable energy sources and major markets.
109	4. Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. Roads cause or enable many types of environmental degradation, including significant impacts to cultural resources, topsoils, and wildlife. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources. Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soil
109	1. The Climate Crisis and the now-confirmed and still-escalating types and levels of environmental change in the SunZia impact area mean that all baselines used in the 2015 FEIS must [be] reconsidered and the proposed action must be completely re-analyzed.
135	We are also very aware of the increasing rapidity of climate change effects with the incredible heat waves this summer, the drought that we in New Mexico continue to experience and now the threat of summer storms in coastal areas and this does not even address our need to care for our brothers and sisters most affected in poorer countries around the world and the rates of animal extinctions due to quick weather shifts.
140	Also, as we have seen more and more recently, large power grids are more easily disrupted by extremes in weather. In a time of global climate change, it seems important to put our resources into generating more power locally at the place where it is being used so that 1) the people using the power also experience and understand the effects of generating it instead of pushing those effects off onto other people, lands, and ecosystems, and 2) power sources are not so vulnerable to disruption by weather or sabotage.

Submission Number	Comment Text
141	Construction will require heavy machinery and multiple truckloads of materials. The agencies must analyze the immediate climate impacts of the construction, as well as the long-term climate impacts of potentially continuing to use energy derived from fossil fuel. We recognize that the scoping materials indicate that the SunZia transmission line will be used to transport mostly renewable energy, but until that energy production is online we are concerned that fossil fuel-derived energy will be transported and this transmission line will serve to rationalize the continued dependence upon fossil fuel-derived energy.
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: persistent drought and increased wildfire risk which will increase the need for vegetation clearing along the transmission line and new roads and significantly increase impacts to species, habitats and other resources to a degree not anticipated in earlier environmental review;
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: excessive local groundwater pumping which is impairing the San Pedro River system along with the impacts of increasing drought and climate change, these cumulative impacts to the San Pedro River, adjacent lands and resources must be addressed along with the critical need to protect and conserve these rare and declining resources.
153	If combatting climate change is really the goal, why not spend the same amount of money on investing in localized, low-impact energy infrastructures; maintaining or updating existing energy systems; and diverging from plans that inherently waste generated resources by transporting them hundreds of miles through sensitive ecosystems?
153	Other materials and equipment of all kinds that will be necessary for the construction and maintenance of the project are also potentially detrimental to environments in the vicinity. For example, will SunZia's high-voltage systems be insulated with sulfur hexafluoride, a potent greenhouse gas, like many others? Sulfur hexafluoride can leak into the atmosphere from aging equipment or during maintenance and servicing, trapping heat and warming local and global atmospheres, ultimately degrading the tenuous climate situation that SunZia's green energy is supposed to countereffect.
163	Construction of any of these alternative routes will cause major, lasting disturbance to an area that is already under duress from climate change. It will accelerate invasive species colonization, augment erosion, disrupt habitat, and alter the natural landscape irremediably. All these impacts would need to be analyzed fully in a new EIS, which would have to include a complete survey of flora and fauna in all areas effected by construction and maintenance of the transmission line.
176	<p>Riverine and riparian ecosystems are the most productive, biologically diverse, and threatened habitats in the American Southwest (Johnson and Jones 1977, Johnson et al. 1985, Knopf et al. 1988, Ohmart et al. 1988, Johnson 1991, Minckley and Brown 1994). Riparian habitats support ecological processes and diverse assemblages of distinctive species that are not found in the surrounding uplands (Stevens et al. 1977, Minckley and Brown 1994).</p> <p>Despite their great ecological importance, land management activities such as flow regulation and other anthropogenic activities have substantially compromised the ecological integrity of stream, wetland, and riparian ecosystems throughout North America (Minckley and Brown 1994, Dale et al. 2000) and in the MRG in particular. Estimates of riparian habitat loss range from 40% to 90% in the arid southwestern states (Dahl 1990), and riparian habitats are considered to be one of the region's most endangered ecosystems (Minckley and Brown 1994, Noss et al. 1995).</p> <p>Because of the increasing impacts of climate change, prolonged drought and urban development in the historic floodplain, the loss of wetland habitat in the MRG now likely exceeds the higher range of Dahl's estimates that were published in 2000. As a consequence, the hundreds of thousands of birds that have been migrating through and wintering in the MRG for millions of years are now dependent on 5% to 10% of the wetlands habitat that have supported them historically.</p>
184	Other materials and equipment of all kinds that will be necessary for the construction and maintenance of the project are also potentially detrimental to environments in the vicinity. For example, will SunZia's high-voltage systems be insulated with sulfur hexafluoride, a potent greenhouse gas, like many others? Sulfur hexafluoride can leak into the atmosphere from aging equipment or during maintenance and servicing, trapping heat and warming local and global atmospheres, ultimately degrading the tenuous climate situation that SunZia's green energy is supposed to countereffect.
184	If combatting climate change is really the goal, why not spend the same amount of money on investing in localized, low-impact energy infrastructures; maintaining or updating existing energy systems; and diverging from plans that inherently waste generated resources by transporting them hundreds of miles through sensitive ecosystems?

## Soils, Minerals, and Geology Comments

Submission Number	Comment Text
77	Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soils.
86	There are coal mines really close to where the power lines are slated to go through. This is a real danger. Don't know why that wasn't considered. I was told that there are Uranium mines in the area by my real estate agent who sold me the property. That should be researched. That can't be safe to have power lines around that. There are several other mineral mines in the area. Not a good idea to ruin them with this project. Too many things at stake. New Mexico may need them later. I would think that would be considered!
106	The wide swath of ground demanded by the Sun Zia transmission lines will require many lifetimes to return to its present undisturbed state once machinery and humans are introduced to the site. Limited information is available in the plan documents describing SunZia's commitment to environmental restoration post construction. Use of the term feasible throughout the document provides for loopholes to avoid adequate remediation commitment by Sun Zia or its subcontractors. Despite efforts to restore the refuge to its pre-construction state, the need for ongoing maintenance on completed lines will continue to disturb the environment into the future.
109	4. Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. Roads cause or enable many types of environmental degradation, including significant impacts to cultural resources, topsoils, and wildlife. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources. Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soil.
138	Every new access road, first used by very heavy equipment, would later invite motorized trespassers and require constant maintenance to prevent erosion and invasive plants. Gates have no meaning.
146	We care about protecting the wilderness areas and protecting them from erosion which can destroy habitat and species, then disrupt and pollute the water. We want the rivers like the Rio Grande and Rio Salado and arroyos and mesas protected from erosion and destruction.
153	Earth Resources The importance of the regional geology, mineral resources, and unique soils of the areas of Arizona and New Mexico that SunZia plans to develop is vast. Not only will construction and ongoing operations take a scarring toll on the landforms of the region across south-central New Mexico to Arizona, the record of the land within the ground, and its history, will literally be bulldozed for the goals of the project and the likely development proposals that would follow. What guarantees will there be that once upheaval begins and the earth is altered in large swaths SunZia will protect inhabitants from the devastating and known effects of erosion in delicate areas? Will flood and landslide insurance be provided?
158	Earth resources (geology, minerals, and soils) As stated in the Background Section, the overall SunZia transmission route right-of-way alone will consume an area larger than the city of Santa Fe, NM. The Riley/SRR Route right-of-way will consume ~3697 acres. The ~3697 acres under these transmission towers is mostly pristine land with many terrain changes. The difficulty in building in this terrain will be rife with issues, such as potential erosion, permanent damage to terrain and vegetation, and destruction and disruption of habitat to name a few. There will most likely be the need for temporary access roads during construction and possibly permanent roads for maintenance. Almost the whole Riley/SRR Route is through environmentally sensitive areas. Roads would create additional damage. Given the rough terrain as seen in Figure 5, which shows the elevation changes along the Riley/SRR Route, construction may be difficult and especially prone to erosion. As depicted, many of these slopes are extremely steep. Machinery used to build these transmission lines would likely leave significant and permanent damage along the route and possibly off the route as well. Desert terrain is a very fragile environment. There are still trail ruts from wagons that used the Santa Fe trail over a century ago. Erosion would be a significant concern and ultimately the silt products from erosion could end up in the Rio Grande. The Rio Grande is already struggling with water levels and water flow and adding additional silt and soil material into the Rio Grande would be detrimental to this great river which is vital to New Mexico. Fourteen miles North of Magdalena and within five miles of the proposed Riley/SRR Route is where the C de Baca Uranium project was located. It could be that uranium or some other minerals could be exposed while digging foundations and disturbing the earth under these sites.

Submission Number	Comment Text
158	Recommendation 14: The BLM should deny the request for Component 3 Alternate 1. The nearly pristine acreage consumed by this path and the elevation changes along this path are significant. Due to this topography, the chance for erosion, permanent damage to terrain and vegetation is significant. Through soil erosion, this could introduce additional silt into the riparian environment of the Rio Salado and the Rio Grande. If the BLM continues to view this as an option, then the BLM should hire an outside consultant to review this route and not rely on SunZia to perform the route engineering unchecked. SunZia has a conflict of interest. The BLM should engage an environmental engineering firm that has subject matter expertise in construction of transmission towers to address risks and shortcomings in the SunZia designs, evaluate those designs for environmental impact, and offer corrective actions, which should be conditions of any grant of permission for the route. The comment would also apply to other paths under consideration, present paths and future paths.
172	SunZia, et al, should be debated as to the real purpose of the proposed route for their so called merchant application. They are running those lines to areas that are mining districts and not for use as suggested. They are trying to get power and gas (Lobo gas line application withdrawn for now) too Lincoln county, Chavez county, and Socorro county for existing and planned mining operations: White City/Jarales in Lincoln, the Garnet mine purposed in Chavez county, and the Strawberry peak mine in Socorro county (already in operation) are the areas in direct line with these powerlines. According to newspapers they have been working quietly for decades to get this completed. Approval of this line system would make the permit applicant and perhaps the PRC liable to the landowners due the fact that when SunZia change the purpose for their operation as stated for application approval they are "taking" from the landowners and the government.
184	Earth Resources The importance of the regional geology, mineral resources, and unique soils of the areas of Arizona and New Mexico that SunZia plans to develop is vast. Not only will construction and ongoing operations take a scarring toll on the landforms of the region across south-central New Mexico to Arizona, the record of the land within the ground, and its history, will literally be bulldozed for the goals of the project and the likely development proposals that would follow. What guarantees will there be that once upheaval begins and the earth is altered in large swaths SunZia will protect inhabitants from the devastating and known effects of erosion in delicate areas? Will flood and landslide insurance be provided?

## Water Resources Comments

Submission Number	Comment Text
97	1= Need detail of the river crossings. Are the crossings going to be aerial or buried? Need the location of the poles and the arc over the river vegetation. Also need the area around the lines to see if veg must be cleared. These lines have very large structures and located far apart, which might minimize impacts, but need to see possible locations on the ground. 4=Right now, 3 new river crossings and the original river crossing have been offered. Are there any other possible crossings?
97	3=MRGCD and Reclamation have jurisdiction over the river and floodway, and MRGCD's extends further to canals and other irrigation infrastructure. Please coordinate with MRGCD about the river crossings and permitting. What access will be needed during line construction?
138	In construction, massive amounts of water would be used to make the cement platforms. This project would do so much damage that it could not be mitigated.
141	We also note that the amendments proposed in the Notice of Intent include a large amount of road construction, both permanent maintenance access roads and temporary construction access roads. The construction and maintenance of these roads were not analyzed in the 2013 EIS, of course, because the line was going to be constructed along a different path. The impact of road construction and maintenance must be fully addressed through the lens of landscape and wildlife corridor fragmentation, ground and surface water interaction, and full cultural artifact surveys. This project also demands historic surveys of the area to determine the presence of and protect cultural and historic artifacts, particularly due to the proximity of the Camino Real and Jornada del Muerto.
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: excessive local groundwater pumping which is impairing the San Pedro River system along with the impacts of increasing drought and climate change, these cumulative impacts to the San Pedro River, adjacent lands and resources must be addressed along with the critical need to protect and conserve these rare and declining resources.

Submission Number	Comment Text
146	We care about protecting the wilderness areas and protecting them from erosion which can destroy habitat and species, then disrupt and pollute the water. We want the rivers like the Rio Grande and Rio Salado and arroyos and mesas protected from erosion and destruction.
153	How about the often conflict-ridden and tense issues surrounding water rights in New Mexico and Arizona? When the transmission project disrupts existing waterways and accesses, who will provide resources for the properties and environments below the kinks?
157	Minimizing damage: In sensitive areas along the chosen route, we appreciate SunZia's efforts to identify technologies that minimize impacts to conservation values, e.g. the use of taller towers and helicopters for line deployment where the line crosses the San Pedro River, which reduce the need to remove stream-side forests and other important riparian habitat. However, we remain concerned about the impacts of other construction and maintenance activities; these concerns are amplified by the current proposal to expand the construction footprint beyond what was approved in the EIS and make many miles of road permanent rather than temporary. Roads are widely considered to be one of the major sources of habitat and watershed degradation, especially in semi-arid areas. The description of the amendment to keep access roads permanent after construction indicates a very large footprint (709 miles) but does not indicate where the new segments will be located and thus doesn't contain enough information to enable analysis of impacts or comparison of alternatives. In the forthcoming EIS process, we ask that SunZia and BLM provide detailed maps showing where new and existing roads are located and analyze a full range of alternatives for constructing and managing these roads. NEPA analyses will need to look at both initial impacts and ongoing effects through time (e.g. from erosion, spread of invasive plants, and proliferation of spur roads, interruption of wildlife corridors, and generally expanded public access to areas where remoteness formerly served to protect natural and cultural resources); cumulative effects with other foreseeable activities; and interactions with other transportation and land management plans (including RMPs and Travel Management Plans of all BLM and USFS units, habitat management areas and hunting units, grazing leases on federal and state lands, and cultural resource protection strategies). Without detailed information about where temporary and permanent roads and expanded Right of Ways would be located, these kinds of impacts cannot be analyzed, and stakeholders cannot provide informed input on alternatives
157	Offsetting unavoidable impacts: Overall, we find the mitigation offsets described in the original 2013 EIS and the 2016 ROW grant processes to be inadequate to adequately compensate for unavoidable impacts. The 2016 ROW, for example, only required offsets for a small number of acres in Designated Critical Habitat of federally listed Endangered Species. These handful of acres represent a tiny fraction of the acres that will be exposed to watershed disturbance and habitat degradation from construction and maintenance of this powerline and its associated infrastructure. Our 2015 letter to the Arizona Corporation Commission describes these un-mitigated impacts in detail. This amendment is an opportunity to evaluate a broader suite of potential mitigation measures, from avoidance to offsets. Specific to road impacts, adding permanent road miles and an expanded footprint to the right-of-way would cause additional ongoing impacts; this network should be examined for least-harm alternatives, and then considered in offset calculations. These impacts will be cumulative to impacts of the road network and construction footprint already described in the 2015 EIS. Because habitat/watershed degradation often has non-linear effects, the most robust approach for this amendments NEPA process would be to conduct an analysis of mitigation options for the full set of roads, construction disturbance, and other infrastructure not just the most recent proposed changes.
158	Water resources In their final state, the transmission lines would not be a big consumer of water resources or have a significant effect on the overall water situation in and around the transmission lines. There are a few potential exceptions to that however. Presumably anchoring towers to the ground, would require concrete, which requires water to mix. Given the scant amount of water in the area it would stand to reason that it will have to be trucked in, which of course creates significant road damage. Additionally, to mitigate dust during construction sites may have to be wetted down. The more significant concern would be that the large right of ways required under the transmission lines would create a natural path for erosion, especially if vegetation needs to be cleared for other reasons, as vegetation naturally reduces the effect of running water as it relates to erosion. The same concerns would exist with both temporary and permanent roads created by the project. The area by these power lines is cut through by arroyos and in the case of the Riley/SRR Route most of these end up in the Rio Salado and ultimately the Rio Grande. F
172	The lines will run directly over Indian cultural sites and are directly over seven irrigation and drainage canals, as well as the railroad- All passing over within one miles' width; and less than a mile for Escondida Lake.

Submission Number	Comment Text
176	Riverine and riparian ecosystems are the most productive, biologically diverse, and threatened habitats in the American Southwest (Johnson and Jones 1977, Johnson et al. 1985, Knopf et al.1988, Ohmart et al. 1988, Johnson 1991, Minckley and Brown 1994). Riparian habitats support ecological processes and diverse assemblages of distinctive species that are not found in the surrounding uplands (Stevens et al. 1977, Minckley and Brown 1994). Despite their great ecological importance, land management activities such as flow regulation and other anthropogenic activities have substantially compromised the ecological integrity of stream, wetland, and riparian ecosystems throughout North America (Minckley and Brown 1994, Dale et al. 2000) and in the MRG in particular. Estimates of riparian habitat loss range from 40% to 90% in the arid southwestern states (Dahl 1990), and riparian habitats are considered to be one of the region's most endangered ecosystems (Minckley and Brown 1994, Noss et al. 1995). Because of the increasing impacts of climate change, prolonged drought and urban development in the historic floodplain, the loss of wetland habitat in the MRG now likely exceeds the higher range of Dahl's estimates that were published in 2000. As a consequence, the hundreds of thousands of birds that have been migrating through and wintering in the MRG for millions of years are now dependent on 5% to 10% of the wetlands habitat that have supported them historically.
184	How about the often conflict-ridden and tense issues surrounding water rights in New Mexico and Arizona? When the transmission project disrupts existing waterways and accesses, who will provide resources for the properties and environments below the kinks?

### Paleontological Resources Comments

Submission Number	Comment Text
153	Paleontological Resources and Cultural Resources These particular areas of New Mexico and Arizona that SunZia proposes to tap contain literally countless records of human prehistory and history, as well as the scientific history of the regions plant and animal life. They are full of archeological and paleontological sites that are rife with pottery and other artifacts, ancient fossils, historic landscapes, and much, much more. Along with the state and nationally protected lands that are home to these exquisite and fading sites, archeological and paleontological locations can be found simply by exploring properties and roadsides along the proposed SunZia routes. Having trekked just a small percentage of this acreage, I can attest to finding: potsherds and beads from multiple sites and eras of indigenous occupation; fossilized marine invertebrates from when the area was part of a large inland sea; manos and matates from ancient natives going about their chores; historical buildings and cemeteries; remnants of old cowboy camps; the delicate imprint of ferns from bygone geologic periods; etc. You can't walk ten feet toward a rock to pee behind without coming upon some remnant of sacred eras past. At what net revenue for SunZia will the loss of these priceless resources for everyone else become profitable?
184	Paleontological Resources and Cultural Resources These particular areas of New Mexico and Arizona that SunZia proposes to tap contain literally countless records of human prehistory and history, as well as the scientific history of the regions plant and animal life. They are full of archeological and paleontological sites that are rife with pottery and other artifacts, ancient fossils, historic landscapes, and much, much more. Along with the state and nationally protected lands that are home to these exquisite and fading sites, archeological and paleontological locations can be found simply by exploring properties and roadsides along the proposed SunZia routes. Having trekked just a small percentage of this acreage, I can attest to finding: potsherds and beads from multiple sites and eras of indigenous occupation; fossilized marine invertebrates from when the area was part of a large inland sea; manos and matates from ancient natives going about their chores; historical buildings and cemeteries; remnants of old cowboy camps; the delicate imprint of ferns from bygone geologic periods; etc. You can't walk ten feet toward a rock to pee behind without coming upon some remnant of sacred eras past. At what net revenue for SunZia will the loss of these priceless resources for everyone else become profitable?

## Cultural Resources and Native American Concerns Comments

Submission Number	Comment Text
184	Paleontological Resources and Cultural Resources These particular areas of New Mexico and Arizona that SunZia proposes to tap contain literally countless records of human prehistory and history, as well as the scientific history of the regions plant and animal life. They are full of archeological and paleontological sites that are rife with pottery and other artifacts, ancient fossils, historic landscapes, and much, much more. Along with the state and nationally protected lands that are home to these exquisite and fading sites, archeological and paleontological locations can be found simply by exploring properties and roadsides along the proposed SunZia routes. Having trekked just a small percentage of this acreage, I can attest to finding: potsherds and beads from multiple sites and eras of indigenous occupation; fossilized marine invertebrates from when the area was part of a large inland sea; manos and matates from ancient natives going about their chores; historical buildings and cemeteries; remnants of old cowboy camps; the delicate imprint of ferns from bygone geologic periods; etc. You cant walk ten feet toward a rock to pee behind without coming upon some remnant of sacred eras past. At what net revenue for SunZia will the loss of these priceless resources for everyone else become profitable?
77	Consider cultural resources on par and in conjunction with biophysical aspects of the environment.
77	BLM is advised to give special consideration to the vital importance of the Rio Grande and Rio San Pedro corridors as cultural landscapes and as region-defining visual resources that are far too precious to sacrifice for incompletely considered, profit-driven projects, especially a tie line with extraordinarily high visual impacts.
77	The 2015 programmatic agreement (to satisfy the requirements of the National Historic Preservation Act) for the approved R-o-W does not include provisions for changes to the R-o-W. Neither that agreement nor the 2015 FEIS adequately consider or address the Rio Grande and Rio San Pedro as likely cultural landscapes. The impending DEIS must do so. A new or substantially amended programmatic agreement is now required.
92	We urge you to consider and mitigate as much as possible the impact to our lands and particularly to sacred cultural sites and tribal lands
146	We care about preserving the Old Ones graves and prehistoric sites and not desecrating them. Also The cowboy and NM culture and history, with the old grave yards and ghost towns.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
153	Paleontological Resources and Cultural Resources These particular areas of New Mexico and Arizona that SunZia proposes to tap contain literally countless records of human prehistory and history, as well as the scientific history of the regions plant and animal life. They are full of archeological and paleontological sites that are rife with pottery and other artifacts, ancient fossils, historic landscapes, and much, much more. Along with the state and nationally protected lands that are home to these exquisite and fading sites, archeological and paleontological locations can be found simply by exploring properties and roadsides along the proposed SunZia routes. Having trekked just a small percentage of this acreage, I can attest to finding: potsherds and beads from multiple sites and eras of indigenous occupation; fossilized marine invertebrates from when the area was part of a large inland sea; manos and matates from ancient natives going about their chores; historical buildings and cemeteries; remnants of old cowboy camps; the delicate imprint of ferns from bygone geologic periods; etc. You cant walk ten feet toward a rock to pee behind without coming upon some remnant of sacred eras past. At what net revenue for SunZia will the loss of these priceless resources for everyone else become profitable?
157	Avoiding harm: We commend the BLM and SunZia for the 2015 siting decision that avoids a proposed route through Aravaipa Canyon (Subroutes 4A and 4B), which would have had the greatest harm to Arizona's irreplaceable wild lands. Along the chosen route through Arizona, however, we remain concerned about impacts to irreplaceable environmental and cultural values in the San Pedro River valley. By choosing this highly problematic alignment, BLM and SunZia have exacerbated the ongoing controversy around approval and construction of this transmission line, and have increased the need for other mitigation measures.
172	The lines will run directly over Indian cultural sites and are directly over seven irrigation and drainage canals, as well as the railroad- All passing over within one miles' width; and less than a mile for Escondida Lake.



Submission Number	Comment Text
92	we urge you to consider and mitigate as much as possible the impact to our lands and particularly to sacred cultural sites and tribal lands
105	After SunZia received a Record of Decision from the BLM six years ago, SunZia's permit application at the Arizona Corporation Commission was approved by a narrow 3-to-2 margin, following an extended set of hearings in which there was compelling testimony in opposition to SunZia that painstakingly detailed extensive adverse impacts to an area of unique biological wealth and rich cultural resources found along the most remote and previously undisturbed stretch of the San Pedro River. Part of this evidence included a letter written in 2012 to the BLM by SunZia's own project manager admitting that this route would be ecologically inappropriate [page J-737 in the SunZia Final EIS of 6/14/2013].
109	3. Consider cultural resources on par and in conjunction with biophysical aspects of the environment. The two are indivisible and merit integrated consideration in Federal planning and permitting.
109	BLM is advised to give special consideration to the vital importance of the Rio Grande and Rio San Pedro corridors as cultural landscapes and as region-defining visual resources that are far too precious to sacrifice for incompletely considered, profit-driven projects, especially a tie line with extraordinarily high visual impacts. The 2015 programmatic agreement (to satisfy the requirements of the National Historic Preservation Act) for the approved R-o-W does not include provisions for changes to the R-o-W. Neither that agreement nor the 2015 FEIS adequately consider or address the Rio Grande and Rio San Pedro as likely cultural landscapes. The impending DEIS must do so. A new or substantially amended programmatic agreement is now required.
109	4. Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. Roads cause or enable many types of environmental degradation, including significant impacts to cultural resources, topsoils, and wildlife. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources. Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soil
109	2. The American Southwest is distinguished from other parts of the world by the highly evolved integration of human and non-human ecosystems. The proposed new R-o-W would, in conjunction with other types and levels of industrial land alteration, threaten and corrupt the essential identity of the Southwest as a place defined by open and natural spaces and by the intricate and sophisticated cultural resource complexes that define cultural landscapes.
139	Speaking again to the Riley/ Santa Rita route, this area is rich in cultural and archaeological resources. There are pottery shards strewn about the land. Much of it is Socorro black-on-white, which can be dated as far back as the 10th century. To build the transmission lines through this area would destroy the cultural heritage and archaeological treasures it holds. Riley is also a documented ghost town, an authentic vestige of the Old West that would be coopted and have its character ruined by the intrusion and eyesore of large modern power structures. The small cemetery there includes the grave of Deputy Sherriff Daniel Bustamante, killed by the bandits infamous for performing the last great train robbery in the west.
141	We also note that the amendments proposed in the Notice of Intent include a large amount of road construction, both permanent maintenance access roads and temporary construction access roads. The construction and maintenance of these roads were not analyzed in the 2013 EIS, of course, because the line was going to be constructed along a different path. The impact of road construction and maintenance must be fully addressed through the lens of landscape and wildlife corridor fragmentation, ground and surface water interaction, and full cultural artifact surveys. This project also demands historic surveys of the area to determine the presence of and protect cultural and historic artifacts, particularly due to the proximity of the Camino Real and Jornada del Muerto.
86	Santa Rita Ranches has a rich history. I have found quite a few artifacts on my land. Lots of adobe bricks that have fancy designs on the outside. The inside being adobe, and the outside being another thin layer of adobe brick face, with a fancy design engraved in to it and placed on the outside of the bigger adobe brick. Some of these designs even have an Egyptian design look to them. Must have been fancy buildings of some kind back in the day.

Submission Number	Comment Text
158	Recommendation 15: The BLM should deny the request for Component 3 Alternate 1. The cultural significance of the town of Riley (Santa Rita) and the community of Santa Rita Ranches would be detrimentally affected by this route. The property values of the residents would reduce. Many of the landowners are retirees or near-retirees that are or will be on fixed incomes. Riley is a ghost town. The visual impact of the transmission lines and towers are out of character and lessens its historical value. There are archaeological sites in the community of Santa Rita Ranches and many of the lots have evidence of tribal occupation from 700 1100 years ago in the form of potsherds that are present. If the BLM continues to view this as an option, then the BLM should conduct an archaeological, historical, and cultural study for this whole area and the area adjacent to it to assess the detriment to the ghost town of Riley (Santa Rita) and the Santa Rita Ranches community, including its landowners. The comment regarding the impact study would also apply to other paths under consideration, present paths and future paths.
101	There are many Indian artifacts on my property and we also have an archaeological site on my property you can look this up on the National Register of Historic Places. There are 22 sites in our association and 12 of them are eligible under Criterion d that contain information important to our understanding of the prehistory of the area.
164	The proposed route through Santa Rita Ranches will be encroaching upon the historic lands and communities of Magdalena, Riley, and the Alamo Navajo Reservation. In doing so, there is a distinct possibility of disturbing potentially historic archeological sites and locales; which, if it does, will require federal archeological investigations, causing the Proposed Route through SRR (Santa Rita Ranches) to be delayed for an indeterminate period.
14	Native American petroglyphs in the area of Scholle Rd. south of Rt. 60 approximately 2 miles are already impacted by Western Spirit. How will SunZia protect these petroglyphs?

## Fire Management Comments

Submission Number	Comment Text
95	...there are fire risks if something should happen to these lines
98	Undergrounding should be considered as fool proof mitigation for fire in the bosque. Fires in California have shown that cleared rights of way are not sufficient.
103	Undergrounding should be considered as fool proof mitigation for fire in the Rio Grande bosque. Fires in California have shown that cleared rights of way are not sufficient.
112	It is remote and completely out of the way with no water and the closest volunteer only, fire department 22 miles away and on a rugged, dirt county road as well. In the event of a fire ,which these high powered lines have been known to cause in California, it would take well over an hour to get to Riley. The other fire department in Socorro (47.9 miles) would take well over 2 hours
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: persistent drought and increased wildfire risk which will increase the need for vegetation clearing along the transmission line and new roads and significantly increase impacts to species, habitats and other resources to a degree not anticipated in earlier environmental review;
146	We care about the threat of fire, like the recent massive catastrophic CA fires.
153	Wildland Fire Ecology and Management What about wildfire protections? Power lines are one of the top causes of wildfires in western areas like the SunZia corridor, which - like many similar environs - is already greatly at risk from drought and other variable threats that increase fire potential. Gas and electric companies can face lawsuits for their responsibility in igniting wildfires and endangering, maiming, and killing animals and humans, as well as their habitats. Every year in recent memory, the wildfire seasons have been more devastating than the ones before. Currently, there are hundreds of thousands of acres burning across the proposed SunZia project area. It seems ill-advised to increase this risk.

Submission Number	Comment Text
158	Wildland fire ecology High voltage transmission lines can be a significant impediment to fighting fires. There are significant power line hazards that are present to personnel fighting fires. <sup>13</sup> The Santa Rita Ranches community does not have installed fire equipment. Wildland fires already present a risk in that area due to the lack of water. This is a risk that the landowners accepted when purchasing their property, but this risk could be significantly exacerbated by the presence of the transmission lines both by making it more difficult to fight fires in the presence of the transmission lines and also the possibility that the transmission lines could contribute to the possibility of a fire. Vegetation management and other measures can mitigate some of that risk, but of course eliminating vegetation is also environmentally detrimental, especially in desert landscapes. Transmission lines present in an area can make fires more prevalent due to weather related events, inadvertent contact with vegetation or other items , equipment failure, and possible conductor slap creating sparks in a dry environment. These are all valid concerns. There is increased risk to the lives and property of the people in the proximity of these transmission lines
158	Recommendation 17: The BLM should deny the request for Component 3 Alternate 1. Due to the fact that people will live near these transmission lines in the community of Santa Rita Ranches, a community without a local water supply to fight fires. If a fire started related to the transmission lines from contact with vegetation, equipment failure, or conductor slap, were to start, there would be no easy way to fight the fire and fighting the fire near transmission towers is problematic. If despite this safety concern to life the BLM continues to view this as an option, then the BLM should conduct a study to understand how to mitigate the potential effects of a wildland fire in the proximity of these transmission lines. The comment regarding the study would also apply to other paths under consideration, present paths and future paths.
165	Of particular note are.... concerns about: a) fires caused by electrical lines and the ability to provide fire mitigation in drought-stricken remote rural areas
184	Wildland Fire Ecology and Management What about wildfire protections? Power lines are one of the top causes of wildfires in western areas like the SunZia corridor, which - like many similar environs - is already greatly at risk from drought and other variable threats that increase fire potential. Gas and electric companies can face lawsuits for their responsibility in igniting wildfires and endangering, maiming, and killing animals and humans, as well as their habitats. Every year in recent memory, the wildfire seasons have been more devastating than the ones before. Currently, there are hundreds of thousands of acres burning across the proposed SunZia project area. It seems ill-advised to increase this risk.

## Public Health and Safety Comments

Submission Number	Comment Text
22	I would like to know what is the danger of living close to 2-500KV transmission lines i own property in Santa Rita Ranches POA i Riley NM and is it safe to continue to live there
24	Large overhead structures can be more vulnerable to weather-related events. Global climate change caught Texas by surprise this spring, freezing infrastructure and causing massive loss of power and bringing suffering to customers. What measures will be taken to protect the lines from extreme weather events not experienced in the past and prevent dangerous conditions for communities in their wake?
24	What measures will be taken to protect the lines from extreme weather events not experienced in the past and prevent dangerous conditions for communities in their wake?
95	There is also a chance that people living near these lines may become ill due to the high levels of magnetic waves
98	Electro-magnetic radiation is also reduced when lines are undergrounded. See upload for Targeted Undergrounding details
101	I really cannot afford to go somewhere else the biggest reason i do not want them there is because i am afraid of the dangers of living that close to those transmission lines Cancer and Leukemia being the most dangerous about 15 years ago my younger brother died of cancer after high voltage power lines went across the street were he lived

Submission Number	Comment Text
139	Another large concern is the threat to health. I would urge the BLM and those making decisions about this project to err on the side of caution, as epidemiological research has found associations between magnetic field exposure and cancer.
140	Also, as we have seen more and more recently, large power grids are more easily disrupted by extremes in weather. In a time of global climate change, it seems important to put our resources into generating more power locally at the place where it is being used so that 1) the people using the power also experience and understand the effects of generating it instead of pushing those effects off onto other people, lands, and ecosystems, and 2) power sources are not so vulnerable to disruption by weather or sabotage.
146	Then there is the electric and magnetic field which will harm us, the animals and even plants and vegetation. The EMFs are said to be safe within 1500 ft. But who knows if that is safe when you're constantly exposed?
151	A significant portion of the proposed SunZia project is the designation and analysis of alternative routes to move the previously pre-approved route out of the White Sands Missile Range (WSMR) Northern Callup Area. This action is critical to national defense due to WSMRs unique capabilities for testing and validating new and emerging military technologies. These unique capabilities cannot be duplicated on any other land-based test and training range. While the pre-approved routing will allow operations to continue at the range, the testing scenarios will be more limited and constrained due to narrowly defined azimuths of approach to the impact areas. This will limit data collection and evaluation and potentially increase the number of failed tests due to the constrained environment. In addition, as military technology continues to evolve, the additional constraints from the transmission line may prevent the ability to test and evaluate the newest systems.
153	On still days, this area of the Southwest is some of the purest there is. Historically, it was even sometimes called the well country for sufferers of tuberculosis and other lung ailments who moved to sanitariums, especially in New Mexico, to breathe easier in the fresh, dry air. Tests increasingly show that a buildup of static electricity around power lines attracts particulates in the air and carries them to the area, where they accumulate. This problem is made worse if power lines are located close to other sources of pollution (like the many sources inherent to large-scale construction sites). Pollutants are often made up of a mixture of contaminants that can then become charged by the electricity running through the power lines. In turn, breathing in charged particles has been linked to many adverse health effects, including cancer. How will SunZia and/or the BLM safeguard the populations in these areas, human and otherwise?
153	Health and Safety/Hazardous Materials Where to even begin here? The effects of high-voltage power lines are still understudied and little understood, even while the giant systems continue to be raised. Levels of electromagnetic fields emitted by high-voltage power lines are hard to quantify and depend on many variables; therefore, accurately gauging the exposure to nearby humans and environments is tricky. Undeniably, the closer in proximity the power lines are to specific people and places, as well as the amount of time spent within their exposure, increases the negative impacts that are possible. It is also practically impossible to shield EMFs from homes and habitats. What choice will landowners or animals, birds, insects, and other life have to escape the EMF zone of the 550+ miles of SunZia's lines?
158	Health and safety/hazardous materials There is significant debate that living near transmission lines could cause health issues. While the exposure to High Voltage DC, plan to be carried by the SunZia Transmission project reduces some of the issues over High Voltage AC, it does not eliminate them. Additionally, in the public hearings SunZia suggested that some of the additional capacity they may use could be High Voltage AC in the future. Therefore, advanced consideration should be given regarding the design of the power lines with that in mind. The Environmental Protection Agency advises to limit ones exposure to Electromagnetic Fields (EMF), stating they should increase the distance between yourself and the source and limit the time spent around the source. <sup>12</sup> A precautionary approach should be taken and the towers should not be placed near residences or biologically rich areas. The Bureau of Land Management should consider setting electrical and magnetic field limits at the edges of the right of way as a condition of approval to protect the public. High voltage power lines like these can induce currents in metal structures. Galvanized steel roofing material, fencing, water tanks, to name a few are items that could suffer from induced currents and could end up being electrified, which could be harmful.

Submission Number	Comment Text
158	Other Environmental Factors Electromagnetic Interference (EMI) Corona generation and gap discharges from electric power transmission lines generate radio noise during their normal operation. These discharges can create EMI that can affect all types of electronics including cell phones, radios, and TVs. There are even studies that show the EMI can have detrimental health effects. Due to the remoteness of Riley(Santa Rita), it is already difficult to obtain a cell signal due to topographic effects, being on the fringe of coverage, and frankly being on the wrong side of geography from where cell phone providers earn their revenue, i.e. population centers. One of the most renowned radiotelescopes in the world, the Very Large Array is approximately 25 miles from this route. Radiotelescopes are extremely sensitive to EMI of all kinds. EMI can affect nearby vegetation. EMI is a noise to radio signals. One might call it the invisible pollution of the radio spectrum.
158	Recommendation 16: The BLM should deny the request for Component 3 Alternate 1. It introduces potential health and safety risks to people, animals, and vegetation along or near this path. This is especially true with respect to the community of Santa Rita Ranches which the lines will traverse. Studies have raised concern about the negative effects of EMF. There is a lot of debate about this matter, but erring on the side of caution because of yet unknown discovered effects should be the BLMs position. High voltage power lines can induce currents in metal structures, which could be harmful, or in the case of water tanks on this route, could prevent animals from obtaining life giving resource A survey should be formed regarding what is in the path of the towers that could be affected detrimentally from a health and safety perspective. The survey comment would also apply to other paths under consideration, present paths and future paths.
159	2. Strategic National Defense efforts have escalated since August 13, 2018, when the President signed the National Defense Authorization Act (NOAA) of 2019, which makes the development of Hypersonic systems one of the nation's top priorities. a. The 2018 NOS addresses modernizing key capabilities: Hypersonic, Integrated Air and Missile Defense, and Advanced Autonomous Systems (including Unmanned Aerial Vehicles), all requiring long range testing in the next 3-6 years. b. Critical National Security capabilities encompassing the DoD and Army priorities in Air and Missile Defense, Long Range Precision Fires, Directed Energy, Hypersonic and Autonomous systems depend on the Land, Airspace and Frequency-space that comprise WSMR for performance testing, threat exploitation and training in a realistic battlespace at tactical ranges. c. Aerial transmission lines in the NCUA would impede our ability to provide realistic operational environments including very-low-altitude test-flight profiles for, missiles, drones and other unmanned vehicles and to adequately replicate the advancing threats of our adversaries.
159	WSMR has prepared Environmental Assessments (EAs) since the date of the Final SunZia EIS in 2016 that will be of interest to your project. These are related to the ongoing test and evaluation of long range weapon systems within the NCUA. a. Theater High Altitude Area Defense (THAAD) Initial Development Program, 1994. This established a Launch Complex in the NCUA. b. Supplemental Environmental Assessment for Lee Impact Area, New Mexico, 2016. This EA adds the testing and evaluation of extended range capability of Precision Fires or similar unitary missiles. c. Environmental Assessment for Advanced Gunfire, 2018. Established the need to develop and mature the science and technologies supporting hypervelocity projectiles and future naval electromagnetic Railgun weapon systems. This EA used a newly established impact area in the NCUA. d. Environmental Assessment for Extended Range Capabilities, 2018. This EA establishes temporary airspace corridors into the NCUA restricted airspace for use in long-range Launch Test Article Testing (LTAT). Low flying systems would use airspace corridors over portions of Valencia, Bernalillo, and Tarrant Counties north of the WSMR NCUA. Additionally, potential ground disturbance associated with target intercept test operations over a temporary debris impact area (1,000 acres) in the NCUA. e. Environmental Assessment for Precision Fires Rocket and Missile Systems Flight Testing from Fort Wingate Launch Complex, 2020. Test activities include launching missiles from the Precision Fires Rocket and Missile Systems family of missiles from Fort Wingate Launch Complex to WSMR in order to test the extended range capability of the missile. f. Environmental Assessment for Solid Fueled Rocket Motor Launches from Fort Wingate Launch Complex, 2018. Launch long range targets out of Fort Wingate Launch Complex to WSMR in support of a layered defense system.
159	WSMR is a tri-service installation operated by the Army, under the responsibility of the Secretary of the Army, with Deputies representing the Navy and Air Force and all three having future emerging needs to test extended long range weapon systems. WSMR provides Holloman, Kirtland, and Cannon Air Force Bases (AFBs) air space and range operations for training, special air operations and other missions. The Department of the Air Force issued a ROD in March 2021 for the EIS to implement actions to achieve Special Use Airspace (SUA) optimization for Holloman AFB, which may be of interest for the project.

Submission Number	Comment Text
159	The Army, Navy and the Air Force have future emerging needs to test extended long range weapon systems. A Programmatic Environmental Impact Statement (PEIS) is in the early stages to develop long range overland flight corridors from locations within the Continental United States terminating at WSMR in support of future long range weapon system testing demand, including hypersonic testing. The proponent is the DoD Test Resource Management Center. The ROD for this PEIS is estimated FY 2024, enabling usage beginning in FY 2025. The point of contact is Mr. Gabriel Saldivar, Acting Director, Strategic Technical Initiatives, gabriel.saldivar.civ@mail.mil, (575) 678-2937 or Ms. Catherine L. Giblin, Environmental Engineer, Materiel Test Directorate, catherine.l.giblin.civ@mail.mil, (575) 678-3541
165	Of particular note are ... concerns about: d e) overall health and safety concerns for both humans and wildlife.
167	There is no master plan at the State of NM level for establishing ecologically sound guidelines for the proper transfer of power across sensitive zones in NM. The visual pollution of these lines is also of concern- they may transfer green power, but they are ugly. Their electromagnetic fields (EMFs), may affect bird life and the navigational ability of bees. Valencia and Socorro Counties appear to be the current targets for a spiderweb of transmission lines. Worse, each power line installation company seems to be pursuing its own route to cross the river before continuing south. This practice cuts up more of the landscape and pits landowners against each other. The fear of an eminent domain action lurks in the background for those who are not interested. Shouldn't the various private power companies and the State and Federal agencies concerned be able to plan one or two well designed and attractive corridors where more than one company's lines can parallel and cross a sensitive area such as the Rio Grande? We have been told that other states, such as California, have put lines underground for some distances at a reasonable cost. The power line company reps who have attended public meetings in Valencia and Socorro counties poo-poo this. But some extra cost may be worth it in terms of a better overall plan. What are some specific examples of technology and cost for underground placement in other states that BLM and other agencies can look at?
172	cell phone and emergency service will be effected and digital television signals will be effected by the power line as well.
184	Climate and Air Quality On still days, this area of the Southwest is some of the purest there is. Historically, it was even sometimes called the well country for sufferers of tuberculosis and other lung ailments who moved to sanitariums, especially in New Mexico, to breathe easier in the fresh, dry air. Tests increasingly show that a buildup of static electricity around power lines attracts particulates in the air and carries them to the area, where they accumulate. This problem is made worse if power lines are located close to other sources of pollution (like the many sources inherent to large-scale construction sites). Pollutants are often made up of a mixture of contaminants that can then become charged by the electricity running through the power lines. In turn, breathing in charged particles has been linked to many adverse health effects, including cancer. How will SunZia and/or the BLM safeguard the populations in these areas, human and otherwise?
184	Health and Safety/Hazardous Materials Where to even begin here? The effects of high-voltage power lines are still understudied and little understood, even while the giant systems continue to be raised. Levels of electromagnetic fields emitted by high-voltage power lines are hard to quantify and depend on many variables; therefore, accurately gauging the exposure to nearby humans and environments is tricky. Undeniably, the closer in proximity the power lines are to specific people and places, as well as the amount of time spent within their exposure, increases the negative impacts that are possible. It is also practically impossible to shield EMFs from homes and habitats. What choice will landowners or animals, birds, insects, and other life have to escape the EMF zone of the 550+ miles of SunZia's lines?

## Vegetation Resources Comments

Submission Number	Comment Text
33	I realize that the proposed Sun Zia transmission tower will use same corridor across Sevilleta National Wildlife Refuge as other towers, combining lines from the other towers with the Sun Zia lines into one structure. But the work required to do this will damage the delicate desert ecosystem and further disturb the Refuge wildlife and plants. The Refuge was set up to be a place with minimal human use so that the land could return to its natural state. Putting more lines in, even along the existing corridor, will cause even more human activity in the Refuge, and result in more developed roads and buildings to service the Sun Zia towers. This is not what the Refuge is supposed to be used for.

Submission Number	Comment Text
80	SunZia would deal a serious blow to this regional effort to address wetland ecosystem health in the Middle Rio Grande Valley.
106	The wide swath of ground demanded by the Sun Zia transmission lines will require many lifetimes to return to its present undisturbed state once machinery and humans are introduced to the site. Limited information is available in the plan documents describing SunZia's commitment to environmental restoration post construction. Use of the term feasible throughout the document provides for loopholes to avoid adequate remediation commitment by Sun Zia or its subcontractors. Despite efforts to restore the refuge to its pre-construction state, the need for ongoing maintenance on completed lines will continue to disturb the environment into the future.
138	Every new access road, first used by very heavy equipment, would later invite motorized trespassers and require constant maintenance to prevent erosion and invasive plants. Gates have no meaning.
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: persistent drought and increased wildfire risk which will increase the need for vegetation clearing along the transmission line and new roads and significantly increase impacts to species, habitats and other resources to a degree not anticipated in earlier environmental review;
157	Minimizing damage: In sensitive areas along the chosen route, we appreciate SunZia's efforts to identify technologies that minimize impacts to conservation values, e.g. the use of taller towers and helicopters for line deployment where the line crosses the San Pedro River, which reduce the need to remove stream-side forests and other important riparian habitat. However, we remain concerned about the impacts of other construction and maintenance activities; these concerns are amplified by the current proposal to expand the construction footprint beyond what was approved in the EIS, and make many miles of road permanent rather than temporary. Roads are widely considered to be one of the major sources of habitat and watershed degradation, especially in semi-arid areas. The description of the amendment to keep access roads permanent after construction indicates a very large footprint (709 miles) but does not indicate where the new segments will be located and thus doesn't contain enough information to enable analysis of impacts or comparison of alternatives. In the forthcoming EIS process, we ask that SunZia and BLM provide detailed maps showing where new and existing roads are located, and analyze a full range of alternatives for constructing and managing these roads. NEPA analyses will need to look at both initial impacts and ongoing effects through time (e.g. from erosion, spread of invasive plants, and proliferation of spur roads, interruption of wildlife corridors, and generally expanded public access to areas where remoteness formerly served to protect natural and cultural resources); cumulative effects with other foreseeable activities; and interactions with other transportation and land management plans (including RMPs and Travel Management Plans of all BLM and USFS units, habitat management areas and hunting units, grazing leases on federal and state lands, and cultural resource protection strategies). Without detailed information about where temporary and permanent roads and expanded Right of Ways would be located, these kinds of impacts cannot be analyzed, and stakeholders cannot provide informed input on alternatives.
157	Offsetting unavoidable impacts: Overall, we find the mitigation offsets described in the original 2013 EIS and the 2016 ROW grant processes to be inadequate to adequately compensate for unavoidable impacts. The 2016 ROW, for example, only required offsets for a small number of acres in Designated Critical Habitat of federally listed Endangered Species. These handful of acres represent a tiny fraction of the acres that will be exposed to watershed disturbance and habitat degradation from construction and maintenance of this powerline and its associated infrastructure. Our 2015 letter to the Arizona Corporation Commission describes these un-mitigated impacts in detail. This amendment is an opportunity to evaluate a broader suite of potential mitigation measures, from avoidance to offsets. Specific to road impacts, adding permanent road miles and an expanded footprint to the right-of-way would cause additional ongoing impacts; this network should be examined for least-harm alternatives, and then considered in offset calculations. These impacts will be cumulative to impacts of the road network and construction footprint already described in the 2015 EIS. Because habitat/watershed degradation often has non-linear effects, the most robust approach for this amendments NEPA process would be to conduct an analysis of mitigation options for the full set of roads, construction disturbance, and other infrastructure not just the most recent proposed changes.

Submission Number	Comment Text
158	Vegetation/riparian/noxious and invasive weeds/special status plant species, including Threatened and Endangered Species and their habitat There are 23 rare plants in Socorro County, NM as described in the Rare Plant List maintained by the University of New Mexico. <sup>8</sup> Three of these plants are listed as threatened or endangered by the US Fish and Wildlife Service (USFWS); the Wright's Marsh Thistle, the Dune Pricklypear, and the Pecos Sunflower, which is also listed as threatened by the US Fish and Wildlife Service (USFWS). The Pecos Sunflower, seen in Figure 4, is a particularly beautiful flower and had been found at the nearby La Joya Wildlife Refuge. This refuge is very near the confluence of the Rio Salado and the Rio Grande. The community of Riley/SRR straddles the Rio Salado and the proposed Riley/SRR Route parallels the riparian environment of the Rio Salado and also crosses many arroyos which empty into the Rio Salado. These riparian environments are corridors for wildlife and critical environment for vegetation. This route is in very close proximity to Important Plant Areas: 54-Rio Salado at Riley, 55-Rio Grande at Belen, 56-Sevilleta Basin, and 142-Socorro and Strawberry Peaks to name a few. Special care must be made in all these areas to preserve and protect endemic plants.
158	Wildland fire ecology High voltage transmission lines can be a significant impediment to fighting fires. There are significant power line hazards that are present to personnel fighting fires. <sup>13</sup> The Santa Rita Ranches community does not have installed fire equipment. Wildland fires already present a risk in that area due to the lack of water. This is a risk that the landowners accepted when purchasing their property, but this risk could be significantly exacerbated by the presence of the transmission lines both by making it more difficult to fight fires in the presence of the transmission lines and also the possibility that the transmission lines could contribute to the possibility of a fire. Vegetation management and other measures can mitigate some of that risk, but of course eliminating vegetation is also environmentally detrimental, especially in desert landscapes. Transmission lines present in an area can make fires more prevalent due to weather related events, inadvertent contact with vegetation or other items, equipment failure, and possible conductor slap creating sparks in a dry environment. These are all valid concerns. There is increased risk to the lives and property of the people in the proximity of these transmission lines
158	Recommendation 13: The BLM should deny the request for Component 3 Alternate 1. Along or near this path there are many threatened and endangered plant species. If the BLM continues to view this as an option, then the BLM should determine with field surveys, like those described in Recommendation 11, whether or not any of these threatened and endangered plants are in or near to the impact path of the transmission lines and determine what impact if any the project would have on their habitat. Important Plant Areas 54-Rio Salado at Riley, 55-Rio Grande at Belen, 56-Sevilleta Basin, and 142-Socorro and Strawberry Peaks to name a few. Special care must be made in all these areas to preserve and protect endemic plants. The general comment would also apply to other paths under consideration, present paths and future paths.
163	Construction of any of these alternative routes will cause major, lasting disturbance to an area that is already under duress from climate change. It will accelerate invasive species colonization, augment erosion, disrupt habitat, and alter the natural landscape irremediably. All these impacts would need to be analyzed fully in a new EIS, which would have to include a complete survey of flora and fauna in all areas effected by construction and maintenance of the transmission line.
165	Of particular note are ...concerns about: b) environmental issues - especially associated with the fragile nature of semi-arid geography
165	Of particular note are ...concerns about: d) destruction of pristine landscapes caused by the building and maintenance of the transmission lines
176	Riverine and riparian ecosystems are the most productive, biologically diverse, and threatened habitats in the American Southwest (Johnson and Jones 1977, Johnson et al. 1985, Knopf et al.1988, Ohmart et al. 1988, Johnson 1991, Minckley and Brown 1994). Riparian habitats support ecological processes and diverse assemblages of distinctive species that are not found in the surrounding uplands (Stevens et al. 1977, Minckley and Brown 1994). Despite their great ecological importance, land management activities such as flow regulation and other anthropogenic activities have substantially compromised the ecological integrity of stream, wetland, and riparian ecosystems throughout North America (Minckley and Brown 1994, Dale et al. 2000) and in the MRG in particular. Estimates of riparian habitat loss range from 40% to 90% in the arid southwestern states (Dahl 1990), and riparian habitats are considered to be one of the region's most endangered ecosystems (Minckley and Brown 1994, Noss et al. 1995). Because of the increasing impacts of climate change, prolonged drought and urban development in the historic floodplain, the loss of wetland habitat in the MRG now likely exceeds the higher range of Dahl's estimates that were published in 2000. As a consequence, the hundreds of thousands of birds that have been migrating through and wintering in the MRG for millions of years are now dependent on 5% to 10% of the wetlands habitat that have supported them historically. "



Submission Number	Comment Text
185	As with other linear projects, the Department recommends consideration of potential impacts to wildlife movement corridors, outdoor recreation (e.g., hunting, hiking, camping, and wildlife watching), deposition and/or spread of noxious and invasive weeds, and habitat fragmentation. Enclosed is a report from the Department's online Environmental Review Tool (ERT) prepared specifically for the SunZia Southwest project access roads and temporary work areas outside the granted ROW, and the SunZia West Substation. Within the report are lists of special status species documented within two miles of the project vicinity, special areas that intersect with the project footprint, Species of Greatest Conservation Need (SGCN) predicted to intersect with the project footprint, and Species of Economic and Recreation Importance predicted to intersect with the project footprint. The ERT report is a vital information resource for your use in evaluating potential environmental impacts in Arizona.

### Wildlife Resources Comments

Submission Number	Comment Text
1	My only comment for the moment, it that I am concerned that the Sandhill Cranes will not be cognizant of the power lines with the few number of visibility balls that are installed at the moment. Since the birds have already migrated north this year, the accidents will not be noted until the fall. We see many birds that are killed in the fields around the river valley when they fly into the lower residential type of power lines. Since the SunZia lines are much higher, denser in number (and new) there may be a higher incidence of mortality when larger groups are flying through the area, rather than just between fields. I cannot tell from the project PDFs where the final lines will go, however, currently I am assuming that there will only be one Rio Grande river crossing and that will be where the lines and poles have already been put in place.
7	Undergrounding of the line beneath the Rio Grande and its entire floodplain should be considered as mitigation for impacts to birds (400 species of birds use the Rio Grande in central NM), degraded landscape, and interference with the Rio Grande Trail.
7	The potential loss of grant awards for conservation in an impacted wildlife corridor.
7	The potential substantial effect on other species of wildlife.
8	Of concern also is the crossing of the Rio Grande and the impacts on migrating birds and the local tourism economy. Socorro County depends on these tourism dollars and the negative impact of news stories of dead sandhill cranes will seriously harm an already fragile economy. I
9	There are 386 species of neotropical migratory birds that migrate to and from and through the U.S. each year, including songbirds, shorebirds and birds of prey. In addition to their role in pollination, seed dispersal and pest control, birds also provide early warnings of the effects of climate change and environmental contamination and contribute billions of dollars to the economy through bird watching and bird feeding industries
12	Please reconsider the project that would impact the migratory thru-way for birds and other species through loss of habitat; studies show that millions of birds and bats collide with power lines.
14	What provisions is SunZia proposing to preserve the migratory bird and wildlife refuges that will be heavily impacted in the western parts of Segment 4?
17	Undergrounding of the line beneath the Rio Grande and its entire floodplain should be considered as mitigation for impacts to birds (400 species of birds use the Rio Grande in central NM), degraded landscape, and interference with the Rio Grande Trail.
23	Having read the proposed SunZia route, I have two concerns; both concern habitat: The Rio Grande crossing should be buried to avoid problems for migrating waterfowl.

Submission Number	Comment Text
24	Energy sources can now be created and distributed locally with less impact to the environment shared by people and wildlife, including endangered species such as Gila trout, Chiricahua leopard frog, and Mexican wolf 3, threatened with extinction due to human impacts. If the power is generated in Texas or Southeast NM, keep it there.
28	In particular, it is important that the Environmental Impact Study consider undergrounding the line beneath the Rio Grande and its entire floodplain as mitigation for impacts to birds.
28	Some 400 species of birds use the middle Rio Grande either year-round or seasonally, including species such as ducks important to hunters as well as endangered species (e.g., yellow-billed cuckoo, southwestern willow flycatcher) and species which draw tourists. The continued presence of all these bird species thus has an important economic impact on towns such as Socorro, which hosts the annual Crane Festival.
44	Most alarming is SunZia's proposal to string two 500-kilovolt transmission lines over the Rio Grande, a critically important migratory bird corridor. High voltage transmission lines crossing a major bird flyway will fragment the migratory corridor and will certainly kill birds. New Mexico's Rio Grande Corridor is one of the most important and fragile migratory bird zones in North America. Over 350 species of birds traveling from eleven states funnel down New Mexico's Middle Rio Grande corridor during their annual migrations. Among these birds are the Rocky Mountain population of sandhill cranes, snow geese, Ross's geese and ducks. All of these birds fly close along the river with many of them wintering at Bosque del Apache National Wildlife Refuge, just south of the proposed project river crossing. Other nearby refuges and wildlife management that draw migrating birds include the Ladd S. Gordon Waterfowl Management Area, Sevilleta NWR, and the Valle de Oro NWR. The bird populations that use the Middle Rio Grande Corridor are already hard-pressed. Climate change and development are leaving them fewer places to rest and feed. The riparian cottonwood forest in the Middle Rio Grande Valley is dwindling. For decades, the NMWF and many other conservation groups have worked to protect this precarious and threatened ecosystem. SunZia's transmission lines pose a major threat to this landscape-scale conservation effort now and in the future.
44	Fully explore running the lines under the river to avoid inevitable bird mortality;
44	Fully explore the cumulative effects of building the line in any form on all endemic wildlife species on all area wildlife management areas and refuges as well as on other area lands;
44	If the EIS process recommends the approval of line construction in any form, it's imperative that the EIS identify conservation properties in the immediate project area that the applicant must be required to purchase and donate to public agencies to mitigate the projects effects on wildlife, hunting, birdwatching and other recreation.
44	And again, if this line is built across the Rio Grande, the applicant must be forced to acquire suitable conservation lands in the area that will be set aside under public management to mitigate the inevitable bird deaths that it will cause.
77	(d) minimal impact to wildlife (including avoidance of wildlife refuges or placing the transmission line(s) underground through those refuges).
80	I am writing my scoping comments on the SunZia Southwest Transmission Project. I am a 23 year-long resident of Socorro, NM and a supporter of the advocacy group Protect Our Rio Grande. The SunZia Project is a big threat to the jewel that is our Middle Rio Grande Valley. The Middle Rio Grande Valley is a place of refugia for our human spirits to appreciate beautiful, natural landscape. This land lifts up my heart and the hearts of the many tourists who visit here for respite. We need a rest from our highly industrialized, techno-heavy society. Looking up at the sky through huge transmission lines at a flock of sandhill cranes in my beloved Middle Rio Grande Valley would not bring serenity to my soul. I want the gifts nature offers us to be preserved and protected. We cannot keep sacrificing our beautiful natural ecosystems, such as the Middle Rio Grande Valley, in the pursuit of an insatiable demand for more power by cities. And we also need to ensure the survival of our planet. Sun Zia has not committed to transmitting 100% renewable energy. The energy transmitted does not go to New Mexicans. If the SunZia transmission lines transverse the Middle Rio Grande Valley, we New Mexicans will be paying the price of losing our beautiful habitat and many species of birds, including sandhill cranes, will be at risk of death as they migrate on the flyway that transverses this same valley.
80	The Middle Rio Grande Valley is New Mexico's major river and wildlife corridor.

Submission Number	Comment Text
80	Another company is proposing another transmission line. I fear the SunZia project will set a precedent. How transmission lines are constructed and where they are located will most likely lead to other lines crossing the river at the same location. It will become an energy transmission corridor and should be located and built with that consideration in mind. So instead of being a corridor for over 400 species of birds, our valley could turn into an industrial site, obliterating its great natural value for humans, birds, and other wildlife.
80	The valley is the home to 2 fantastic wildlife refuges - Bosque del Apache and Sevilleta. The Bosque del Apache Wildlife Refuge is one big reason I have chosen the Middle Rio Grande Valley as my home. The Bosque del Apache is an important migration and wintering area for hundreds of thousands of migratory water birds.
80	Mitigation of damage to habitat and the birds themselves requires undergrounding/burying the transmission lines beneath the Rio Grande and its entire floodplain.
97	2=The Fish and Wildlife Service has info on willow flycatchers and cuckoos and habitat along the river. Reclamation is gathering population surveys and vegetation mapping during Summer 2021. Data may be available in draft form depending on the EIS write up schedule. Please request the data after September 2021.
98	Undergrounding: There must be a thorough evaluation of undergrounding where the power lines cross the Rio Grande and its floodplain.
98	Impacts by overhead construction to over 400 species of birds that use the Rio Grande flyway in central New Mexico need to be seriously considered.
98	Undergrounding should be considered as fool proof mitigation for fire in the bosque. Fires in California have shown that cleared rights of way are not sufficient.
101	we have open coal mines copper mines and a very large bat cave in the Riley area now i do not know if bats are an endangered but if they are this needs to be checked out.
103	Undergrounding should be thoroughly evaluated. There must be a thorough evaluation of undergrounding where the power lines cross the Rio Grande and its floodplain. Impacts by overhead construction to over 400 species of birds that use the Rio Grande flyway in central New Mexico need to be seriously considered.
103	Undergrounding should be considered as fool proof mitigation for fire in the Rio Grande bosque. Fires in California have shown that cleared rights of way are not sufficient.
105	After SunZia received a Record of Decision from the BLM six years ago, SunZia's permit application at the Arizona Corporation Commission was approved by a narrow 3-to-2 margin, following an extended set of hearings in which there was compelling testimony in opposition to SunZia that painstakingly detailed extensive adverse impacts to an area of unique biological wealth and rich cultural resources found along the most remote and previously undisturbed stretch of the San Pedro River. Part of this evidence included a letter written in 2012 to the BLM by SunZia's own project manager admitting that this route would be ecologically inappropriate [page J-737 in the SunZia Final EIS of 6/14/2013].
105	SunZia's application for a state permit in New Mexico was denied by a 4-to-0 margin by the Public Regulatory Commission. With the currently proposed amendments and a pledge of cash payments to Socorro County, SunZia is attempting to line up just enough political support to squeak by the New Mexico approval process. However, their new amendments would increase impacts along the Rio Grande, now proposing to cross or skirt two National Wildlife Refuges, not one, as in the prior EIS. Both of these Refuges (Sevilleta and Bosque del Apache) are vital at a hemispherical scale to successful bird migration and breeding. Major transmission lines, towers, and guy wires can pose significant strike hazards for bird life, especially during times of poor visibility.
105	1) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories. Lighting can have profound ecological impacts in a riparian zone.
106	The wide swath of ground demanded by the Sun Zia transmission lines will require many lifetimes to return to its present undisturbed state once machinery and humans are introduced to the site Limited information is available in the plan documents describing SunZia's commitment to environmental restoration post construction. Use of the term feasible throughout the document provides for loopholes to avoid adequate remediation commitment by Sun Zia or its subcontractors. Despite efforts to restore the refuge to its pre-construction state, the need for ongoing maintenance on completed lines will continue to disturb the environment into the future

Submission Number	Comment Text
106	...given that rare and endangered species, such as eagles, occupy areas of the refuge through which the lines are planned to pass, there is strong probability that there will be increasing bird mortality or that these and other such inhabitants will be driven out. Further, the transmission lines as currently planned, will cross portions of the North American Central Flyway used by migrating birds like sandhill cranes. Creating obstructions such as transmission lines affects the birds ability to complete the roundtrip journey that is essential to their survival. Although birds of all sizes and types collide with wires, behavior and body type of larger birds put them more at risk for line collisions and electrocutions.
106	Since visitors to Sevilleta come to view the unbroken panorama, for the pleasure of experiencing the broad vista of open space that defines the roughly quarter million acres of the refuge, transmission towers and a 400+ wide road through the refuge will radically alter that visual experience. Undergrounding the majority of the line on Sevilleta NWR would serve to reduce the impact on humans and animals. No information covering a trade-off analysis for this approach is offered in the Sun Zia documents, implying little or no consideration has been given for undergrounding the lines.
109	4. Critically evaluate the need for the apparently excessive creation of 700 miles of new roads in areas that are (mostly) already roaded. Roads cause or enable many types of environmental degradation, including significant impacts to cultural resources, topsoils, and wildlife. The amount of proposed new road construction entailed in the R-o-W application requires and deserves BLM analyses and evaluations that consider direct, indirect, and cumulative impacts on the full spectrum of biophysical and cultural resources. Additionally, BLM is advised to consider topsoil losses due to road and transmission line construction in terms of contributions to greenhouse gas emissions and in terms of reductions in regional capacities to capture and retain carbon dioxide in soil
111	were concerned about the affect new electric transmission lines will have on the birds.
111	I've heard it would be possible to put the line underground beneath the Rio Grande and its floodplain. This sounds like a good start to reduce impacts on the birds and other wildlife that use this riparian corridor.
111	I'm just concerned about some of the effects of the transmission line through the Rio Grande River corridor
115	General Comments to Minimize Impacts to Wildlife The Department recommends that SunZia's transmission lines, substations, and upgrades to existing power lines be constructed in conformance with the Avian Power Line Interaction Committees, Suggested Practices for Avian Protection on Power Lines (2006) and Reducing Avian Collisions with Power Lines (2012) ( <a href="https://www.aplic.org">https://www.aplic.org</a> ).
115	General Comments to Minimize Impacts to Wildlife All migratory birds are protected against direct take under the federal Migratory Bird Treaty Act (16 U.S.C. Sections 703-712). In addition, hawks, falcons, vultures, owls, songbirds, and other insect-eating birds are protected from take under New Mexico State Statutes (17-2-13 and 17-2- 14 NMSA), unless permitted by the applicable regulatory agency. To minimize the likelihood of adverse impacts to migratory bird nests, eggs or nestlings during transmission line construction activities, the Department recommends that ground disturbance and vegetation removal activities be conducted outside of the primary breeding season for migratory songbirds and raptors (1 March 1 September). If ground disturbing and clearing activities during the breeding season cannot be avoided, the area should be surveyed for active nest sites (with birds or eggs present in the nesting territory), and when occupied, nest disturbance should be avoided until young have fledged. For active nests, adequate buffer zones should be established to minimize disturbance to nesting birds. Buffer distances should be 100 feet from songbird and raven nests, and 0.25 mile from raptor nests. For golden eagle ( <i>Aquila chrysaetos</i> ), ferruginous hawk ( <i>Buteo regalis</i> ), prairie falcon ( <i>Falco mexicanus</i> ) and peregrine falcon ( <i>Falco peregrinus</i> ), a buffer zone of 0.5 mile should be established. Active nest sites in trees or shrubs that must be removed should be mitigated by qualified biologists or wildlife rehabilitators. Department biologists are available for consultation regarding nest site mitigation, and can facilitate contact with qualified personnel.
115	Prairie dog colonies could occur along the length of the transmission line project construction area. Both black-tailed prairie dogs ( <i>Cynomys ludovicianus</i> ) and Gunnison's prairie dogs ( <i>Cynomys gunnisoni</i> ) are designated as New Mexico Species of Greatest Conservation Need, and their colonies provide important habitat for other grassland wildlife. Wherever possible, occupied prairie dog colonies should be left undisturbed. Any burrows that are located on the project site should be surveyed during the period of 1 March-1 September to determine whether burrows are active or inactive, and whether burrowing owls ( <i>Athene cunicularia</i> ) may be utilizing the site. If ground-disturbing activities cannot be relocated off the prairie dog colony, or if project activities involve control of prairie dogs, the Department recommends live-trapping and relocation of prairie dogs. The Department can provide recommendations regarding suitability of potential translocation areas and procedures

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115	This route is the longest of the three proposed routes, and would diverge approximately 13 miles to the west in order to avoid the Seville National Wildlife Refuge (Seville) and BLM specially designated areas, but would require traversing a portion of the Cibola National Forest that includes an Inventoried Roadless Area. This route would also result in the greatest amount of habitat disturbance, as it would traverse through a large area of remote relatively undisturbed habitat. This proposed route would also travel through a portion of desert bighorn sheep ( <i>Ovis canadensis nelsoni</i> ) habitat in the vicinity of Ladron Peak. The EIS should evaluate possible impacts to the desert bighorn sheep population, particularly if construction activities will occur during the rut and lambing season. Seasonal restrictions may need to be implemented, however; the Department currently lacks sufficient data on this population of desert bighorn sheep to fully assess the projects potential impacts.
115	Crossing the Rio Grande. The Departments preferred alternative for crossing the Rio Grande is the proposal to co-locate the SunZia line with the Western Spirit transmission line. To aid in siting and mitigation planning, we recommend that the EIS process include monitoring seasonal bird flight behavior at the three alternative sites SunZia is proposing for crossing the Rio Grande. Project planning should include development of a project specific post-construction Avian Protection Plan, that includes mortality monitoring and adaptive management provisions. Line marker devices should be installed on the lines at potential collision hazard locations, and support towers should be lighted only where required by law, using red or red-and-white blinking or strobe lights. Towers should be erected without guy lines if possible; if a guyed design is necessary, the guy wires should be provided with line markers. In addition to line markers, a recent study using near-ultraviolet light reduced Sandhill Crane ( <i>Antigone canadensis</i> ) collisions with power lines by 98% . Mitigation with line markers has had limited success because most collisions occur at night when line markers are least visible. The Department recommends that the EIS evaluate the use of near- ultraviolet light to mitigate avian collisions where the transmission lines cross the Rio Grande.
115	All three of the alternative sites where SunZia is proposing to cross the Rio Grande occur in designated critical habitat for the federally endangered southwest willow flycatcher ( <i>Empidonax traillii extimus</i> ), Rio Grande Silvery Minnow ( <i>Hybognathus amarus</i> ) and the threatened yellowbilled cuckoo ( <i>Coccyzus americanus</i> ). SunZia should enter into consultations with the U.S. Fish and Wildlife Service for species specific guidance on avoiding and minimizing impacts to aquatic and riparian habitats, as well as seasonal restrictions during transmission line construction.
115	The Department also recommends that EIS evaluate the option, feasibility, and the potential ecological benefits of the SunZia transmission line crossing under the Rio Grande, if it is not colocated with the Western Spirit line.
124	My comment would be to request that any Transmission lines be buried rather than overhead to protect this migration area of our state.
132	It is important to note that transmission lines cause incremental bird mortality along their entire length; Loss et al. (2019) estimate that 14.4 birds are killed annually by each mile of power line (transmission and distribution), and that the annual total for the entire nation is between 8 and 57 million birds. These concerns dictate that the shortest and least impactful route be chosen, and that the entire length of the line be examined to define locations with potentially higher mortality as well as minimization and mitigation opportunities.
132	In terms of impacts to birds, we are primarily concerned about collision mortality of greater sandhill cranes and other waterfowl should an overhead crossing of the Middle Rio Grande (MRG) be selected, and about a range of riparian impacts should an underground river crossing be selected.
132	Analyze the MRG crossing above ground and underground as separate alternatives, incorporating all impacts of each alternative. Fully detail all uncertainties and unknowns about these impacts, and fully incorporate the estimated benefits of any proposed mitigation to offset impacts.
132	Underground analysis must include a full analysis of the following impacts: construction disturbance of river morphology, dewatering station impacts, disruption of flow regimes, removal of riparian vegetation along underground ROWs, impact on critical habitat for endangered species, maintenance disturbance, and potential introduction of invasive species. Habitat mitigation that would offset these impacts needs to be fully detailed as well. A complete examination is needed of new cable technologies being manufactured in Japan <sup>2</sup> and Italy <sup>3</sup> , as well as the implementation of these new cable types for the SOO Green line in the Upper Midwest <sup>4</sup> and for any other projects to date; these were not available when the previous undergrounding study was undertaken, and the flexibility they could provide for a state-of-the-art underground installation must be incorporated into the analysis.

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132	Overhead analysis must include a full analysis of the following impacts: avian collision mortality and mitigation, construction disturbance of river morphology, disruption of flow regimes, impact on critical habitat for endangered species, providing perches for predators, maintenance disturbance, and potential introduction of invasive species. Potential to minimize collision mortality through line marking and near UV illumination also must be analyzed, along with conclusive and timely testing to justify use of this technology in an untested context. The potential impacts of possible mitigation, including purchase of the Herkenhoff property, proposed habitat enhancement, and other mitigation should be fully analyzed and evaluated in the EIS. BLM should also analyze whether purchase of the Herkenhoff property and/or other mitigation measures should be required as a condition of approval of the permit.
132	Examine the need for marking Sections C110 and C212 in Arizona; an increasing number of Sandhill Cranes are spending time in the Bonita area north of the Sun Zia route, and this puts the line between daytime feeding areas and nighttime roost sites in and around Willcox Playa/Cochise Lakes Important Bird Area.
132	In all other areas, examine all routes thoroughly and holistically, gathering pre-decisional information to identify areas where avian impacts are more likely and detail how the mitigation hierarchy will be used to prioritize avoiding impacts through siting, minimizing them wherever needed per APLIC guidelines, and completely compensating for them when they occur to produce net conservation benefit. Ensure that line construction complies with the best practices outlined in the 2014 voluntary Avian Protection Plan (APP) and that the mitigation measures detailed in Appendix E of the Record of Decision are implemented. Use all new information to create a completely updated APP.
132	Impacts on the following bird species must be fully analyzed: greater sandhill crane, western yellow-billed cuckoo, southwest willow flycatcher, and migratory waterfowl. This applies to both the underground and overhead MGR crossing alternatives, as well as at the San Pedro River crossing in Arizona and segments C110, C212 in Arizona for Sandhill Crane and migrating raptors.
132	Thoroughly utilize all greater sandhill crane movement data collected by FWS and other parties to define activity areas and movement pathways between them. Fully use this information to guide siting and mitigation.
132	Impacts analysis for any routes through Sevilleta NWR must quantify avian collision risk from the existing transmission lines as currently configured and compare them to impacts of the two parallel ROWs that would be installed, one with current transmission incorporated, if these routes were chosen. This analysis must fully account for how the lines are distributed into vertical planes and how this affects collision risk as well as the effect of using more of the existing ROW for the new development; although the ROW width would not change, the impacts within that ROW would.
132	The 2015 comment letter from Pima County recommends habitat protection and restoration efforts to offset the roughly 2,400 acres of County Conservation Lands in the San Pedro watershed that would be impacted by SunZia. Specifically, the request was to Work with Pima County to collaboratively develop and implement a long-term monitoring and adaptive management plan that includes but may not be limited to, the control and eradication of invasive species, proliferation of off-road vehicle impacts, effective habitat restoration and vegetation management, and protection of cultural resources. The long-term monitoring and adaptive management plan will be effective for no less than 20 years and will be codified through an enforceable means. We support this recommendation as mitigation for habitat impacts in this important conservation area and request that a full accounting of impacts and mitigation be presented in the DEIS
132	Estimates of riparian habitat loss range from 40% to 90% in the arid southwestern states (Dahl 1990), and riparian habitats are one of the regions most endangered ecosystems (Minckley and Brown 1994, Noss et al. 1995).
132	There are many reasons why the Rio Grande corridor is so critical for birds. During spring and fall migration, the shorelines, mudflats, and sandbars of the reservoir and river in this area provide important feeding grounds for migrating shorebirds and waterbirds that need to refuel during their journey along the river corridor. The waters of the Rio Grande in this area also support valuable riparian forests and marshes which host breeding populations of many neotropical migrants such as warblers, tanagers, and flycatchers, and these same riparian habitats are critical migration stopovers for other species that breed farther north.
132	Audubon has concerns about the impacts of the SunZia transmission line on the Rio Grande, particularly with the Middle Rio Grande Valley and the specific routes through Sevilleta NWR and that bisect movement pathways between the units of Ladd S. Gordon Waterfowl Complex and Important Bird Area. Because of unacceptable impacts to migrating Sandhill Cranes and other important birds and wildlife, BLM should not select any routes that involve new crossings of the Rio Grande in this area, unless environmental analysis shows that running the line underground in this area would sufficiently limit impacts.

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132	<p>The Ladd S. Gordon Waterfowl Complex is a cooperative project between the New Mexico Department of Game &amp; Fish and the U.S. Fish and Wildlife Service to feed and harbor migrating waterfowl along the Rio Grande corridor. Because of the importance to migrating and wintering ducks, geese, and cranes, this waterfowl complex was designated as an Important Bird Area in 2000. These refuges feed approximately one-half of the wintering waterfowl in the Middle Rio Grande Valley. The Belen Waterfowl Area is four miles south of Belen on New Mexico 109. This 230-acre farm grows corn and alfalfa for migrating waterfowl. The Casa Colorado Waterfowl Area comprised of 420 acres of cultivated crops is six miles south of Belen on New Mexico 304. The Bernardo Waterfowl Area is 17 miles south of Belen near Bernardo and straddles U.S. Highway 60. This property consists of more than 1,700 acres with 450 acres in cultivation and is open to the public on most days, with recent improvements for bird viewing and photography platforms. The La Joya Waterfowl Area is 22 miles south of Belen, just east of I-25 and consists of 3,500 acres containing 600 acres of man-made ponds to provide winter feed and resting areas. These areas represent a significant investment in conservation that has paid off and must be safeguarded.</p>
132	<p>Located on the southern end of the Central Flyway and along the key migration corridor of the Rocky Mountain population of Sandhill Cranes, the Middle Rio Grande Valley, more specifically the Socorro reach of the valley, has been integral in the rebuilding and protection of this waterbird population. During the early 1900s the Rocky Mountain population of Sandhill Cranes numbers plummeted due to habitat alteration, land fragmentation, and human population growth (Taylor 1999). By the 1940s, the population was estimated to be fewer than 400 birds. Efforts to protect habitat, restore wetlands, and enhance existing natural and agricultural habitats in combination with sound population management practices helped the species recover to between 18,000 and 20,000 birds annually (Taylor 1999). Today along with the Rocky Mountain population cranes, the Middle Rio Grande Valley plays host to hundreds of thousands of migrating and wintering waterbirds and countless breeding and migratory neotropical migrants and raptors including the endangered Southwestern Willow Flycatcher and the candidate species Yellow-billed Cuckoo.</p>
132	<p>Greater Sandhill Cranes A Species Particularly Vulnerable to Transmission Collision Mortality Our concerns about the potential impacts of transmission collision mortality on greater sandhill cranes are based on the biology of the species as well as the landscape context. As a group, the configuration of their vision makes cranes particularly vulnerable to transmission line collision mortality. Crane vision is optimized for taking food with the bill at short range, using direct visual guidance accurately and gauge distance. They have a relatively narrow horizontal binocular visual field of 15-10 degrees and substantial parts of the frontal hemisphere have no coverage. This lack of visual coverage in the direction of flight likely contributes to collision probability. Cranes are also not able to see far above in the vertical dimension. Birds are often able to see power carrying conductors of a transmission line at greater distances and shift their flight paths in response, then see the thinner and less visible overhead shield wire that protects the other lines from lightning strikes at the last minute. In this situation, the overhead shield wire is often narrowly avoided through flaring of the wings and rapid upward flight. It may not be possible for cranes to see the shield wire in this context given their narrow vertical field of vision.<sup>5</sup> This, combined with their heavy wing loading and lack of maneuverability, may put them at greater risk with respect to other species. Sandhill crane mortality has been well documented for over six decades, starting in 1945 and with a number of notable mass mortality events over the years.<sup>6</sup> Drewien<sup>7</sup> estimated that 37% of mortality in the Rocky Mountain population was due to collisions with power lines, particularly power lines between feeding and roosting habitats where low altitude flights occur frequently at dawn and dusk when visibility is low, an assertion supported by studies in other areas.<sup>8</sup> Brown et al.<sup>9</sup> suggest that new transmission lines should not be constructed within 2 km of roosts or feeding sites. Increased collision mortality during inclement weather and low visibility conditions has also been noted consistently across the years in multiple studies (Walkinshaw 1956, Wheeler 1966, Nesbitt and Gilbert 1976, Tacha et al. 1979).<sup>10</sup> Greater sandhill cranes were the most common bird species detected during mortality surveys in the San Luis Valley ~260 miles north of the proposed SunZia MRG crossing, and juvenile greater sandhill cranes represented significantly more of this mortality (30%) than adults (4.7%). These birds collided making low level flights between wetland roosts and feeding areas (croplands), with collisions occurring frequently during windy conditions. <sup>11</sup> Given that sandhill cranes have the lowest annual recruitment of any game bird species in North America and typically don't reproduce until their third year, the effects of increases in long-term juvenile mortality are of great concern, and highlight the need for a thorough risk assessment along with a coherent program to offset impacts should an overhead MRG crossing be chosen as the preferred alternative in the final EIS. Effectiveness of marking power lines to minimize greater sandhill crane collision varies by type of marker used, power line configuration in horizontal and vertical space, marker density, and by many site-specific factors. The studies cited above that examined efficacy of marking lines all showed they reduced mortality significantly compared to unmarked lines and resulted in over 50% mortality reduction. Enhancing this deterrent effect through near UV illumination of markers increased effectiveness to 95% at Audubon's Rowe Sanctuary, but this was a preliminary study done in a context where greater sandhill cranes roost directly below lines and flush up into them— fundamentally different than a SunZia MGR crossing.</p>

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134	We ask the BLM and cooperating agencies to fully explore the issues detailed below in the Draft EIS. This comment provides recommendations for issues and topics raised by the proposed amendment to the right of way (ROW) for Segment Four of the SunZia transmission line. Defenders is primarily concerned with potential impacts the proposal will have on wildlife and wildlife habitat in the Middle Rio Grande portion of the Central flyway. The Middle Rio Grande is a vitally important stopover location for migratory species such as the sandhill crane and a high voltage transmission line that intersects the river must be responsibly sited so as to minimize detrimental impacts on wildlife and wildlife habitat.
134	Defenders is concerned with potential impacts the proposal may have on wildlife and wildlife habitat in Seville National Wildlife Refuge (NWR) and Sierra Ladrones Wilderness Study Area. As natural desert landscapes, they are particularly vulnerable to human disturbances. The BLM and Fish & Wildlife Service (FWS) must ensure that the proposal is compatible with Seville's purpose and will not impair the wilderness characteristic of Sierra Ladrones.
134	1) For all proposed routes, analyze impacts thoroughly and holistically, gathering pre-decisional information to identify areas where wildlife impacts are more likely and detail how mitigation will be used to prioritize avoiding impacts through siting, minimizing them wherever needed, and completely compensating for them when they occur to produce net conservation benefit.
134	3) Analyses for both above ground and underground alternatives must consider the following impacts: Construction disturbance of river morphology,4 disruption of flow regimes, impact (including direct mortality) on endangered species, threatened species and other sensitive species, impact on critical habitat for endangered and threatened species, potential introduction of invasive species, removal of riparian vegetation along the ROWs, and maintenance disturbance. a. Habitat mitigation that would offset these impacts, including habitat enhancement, must be fully analyzed. Mitigation factors should also consider the benefits of protecting and enhancing habitat through acquisition of the Herkenhoff property and associated water rights.
134	4) Analyses for both above ground and underground alternatives must also fully analyze impacts on the following bird species: greater sandhill crane, western yellow-billed cuckoo, southwest willow flycatcher, and migratory waterfowl. a. Guide siting and mitigation using all greater sandhill crane movement data collected by FWS and other parties by defining activity areas and movement pathways between them.
134	5) Analyses for an above ground alternative must also fully analyze avian collision mortality and mitigation and providing perches for predators. Mitigation factors to minimize collision mortality should consider line marking and near UV illumination, along with conclusive and timely testing to justify use of this technology in an untested context.
134	6) Analyses for an underground alternative must also fully analyze impacts from ancillary facilities, such as dewatering stations and transition stations, and mitigation that would offset these impacts.
134	10) Analyses of route alternatives through Seville NWR must quantify avian collision risk from the existing transmission lines as currently configured and compare them to impacts of the two parallel ROWs that would be installed, if these routes were chosen. These analyses must fully account for how the lines are distributed in the vertical planes and how this affects collision risk.
137	As a birder and a frequent visitor to the Bosque del Apache, I feel that the EIS should address the potential impacts of the line to birds and other wildlife in the Rio Grande corridor. Line placement can not only affect migration and nesting patterns, but interfere with nature viewing tourism that currently brings substantial income to the towns in the area.
138	We want all parties to understand that the Cascabel Working Group is very much in favor of renewable energy especially when the source is close to major end - users. We oppose this particular transmission project because it would permanently damage two of the most important riparian ecosystems in the desert southwest. They support major migration pathways, threatened and endangered species, and rich biological diversity.
138	SunZia's proposed route parallels the Rio Grande and the San Pedro rivers, two of the most important riparian ecosystems in the desert southwest.
138	Transmission lines and towers are proven dangers to bird migration. Extra High Voltage (EHV) lines and the required huge towers amplify danger. The San Pedro Valley hosts three quarters of all neotropical migrant species in the U.S., the Rio Grande has fewer neotropical migrants, but more marsh and water birds. Both rivers support populations of Threatened and Endangered Species.



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139	I am also specifically against the proposed reroute that goes through Riley, NM and the Santa Rita Ranches community. This route is the longest, leading to increased destruction of the land and disruption to local wildlife. This route proposes to skirt around the Ladron Wilderness Study area, but go directly through the pristine and undeveloped land of the Bear Mountains, home to a lot of native wildlife, as well as unspeakably beautiful views. There have even been Mexican grey wolf sightings in this area, an endangered animal the Center for Biological Diversity calls one of the rarest and most imperiled mammals on the continent.
139	It is well documented that electricity delivery systems and roadways disturb the natural environment they traverse. Roughly 45,000 acres within the Bear Mountains belong to Inventoried Roadless Areas and offer an important home to New Mexico's wildlife. It would negatively impact these populations if these roadless areas were disturbed through the building of the transmission lines and their access roads. Negative impacts include direct loss of habitat, population fragmentation, degradation of habitat quality, and road avoidance, which could cause critical species to move on in search of a new home, thwarting their progress.
139	Furthermore, the ambient noise and light from these towers would also disturb both the wildlife and local residents. It really would ruin the essence of the area. I know only one person from the Scoping meetings said they'd visited Riley. It's so quiet out there that the silence becomes loud, like the whole worlds trying to fit in your eardrums at once. And there's so little light pollution that you can see milky way dust and the stars are like a billion gemstones strewn across the night sky. It saddens me greatly to think of that lost.
139	This project has the potential to do a great deal of harm to avian communities. Id like to point out two recommendations from the Audubon society and recommend you follow them: 1.Audubon advocates for putting renewable energy projects close to consumers in order to minimize the length of power lines. 2.Audubon advocates for underground high-voltage lines to eliminate impacts to birds, whenever feasible. This also protects power lines from storms and wildfires.
140	Impacts I would like to see considered for Component 3--Segment 4 reroute: -The effect of this project on the management of the Sevilleta NWR for the health of wildlife and the Rio Grande ecosystem.
141	The new overhead transmission line poses a threat to migratory birds, particularly the alternatives proposed that would construct the line across the Sevilleta National Wildlife Refuge. Of critical concern is the Rio Grande corridor which is a keystone flyway for myriad raptor species and waterfowl. Birdwatchers flock to the Sevilleta, and the Rio Grande flowing through it, to observe migrating birds, an activity that will be severely impacted in the presence of a fairly large transmission line.
141	Beyond the species of least conservation concern, there are likely present a number of threatened and endangered species. A quick survey of the landscape using Fish and Wildlife Services iPac Mapping Tool shows the likely presence of the New Mexico meadow jumping mouse, the Mexican spotted owl, the Northern aplomado falcon, the piping plover, the Southwestern willow flycatcher, the yellow-billed cuckoo, the Chiricahua leopard frog, the Rio Grande silvery minnow, the Alamosa springsnail, the Chupadera springsnail, the Socorro springsnail, the Socorro isopod, as well as the Pecos sunflower and Wrights march thistle. In fact, the Sevilleta is a listed silvery minnow critical habitat. The BLM and cooperating agencies must conduct a thorough biological survey of the landscape prior to approving any construction. Without an adequate biological survey, there is simply no means to implement safeguards and project components that will protect these species.
141	We also note that the amendments proposed in the Notice of Intent include a large amount of road construction, both permanent maintenance access roads and temporary construction access roads. The construction and maintenance of these roads were not analyzed in the 2013 EIS, of course, because the line was going to be constructed along a different path. The impact of road construction and maintenance must be fully addressed through the lens of landscape and wildlife corridor fragmentation, ground and surface water interaction, and full cultural artifact surveys. This project also demands historic surveys of the area to determine the presence of and protect cultural and historic artifacts, particularly due to the proximity of the Camino Real and Jornada del Muerto.
141	Additionally, if an alternative is chosen that would construct the line through Sevilleta, we expect significant offsets in the final EIS and record of decision to ensure that any impacts suffered upon the refuge and its inhabitants do not result in population decline of any avian species. We welcome the opportunity to discuss our concerns with BLM and cooperating agencies as the NEPA process continues, and request that this comment be included in the project record.
143	I write urging you to require that the proposed SunZia power lines be placed underground to mitigate the impact to birds as they use the Rio Grande River as their flyway and to reduce interference with the Rio Grande Trail.
143	There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico.

Submission Number	Comment Text
143	I write urging you to require that the proposed SunZia power lines be placed underground to mitigate the impact to birds as they use the Rio Grande River as their flyway and to reduce interference with the Rio Grande Trail. It is certain that if this is not done a precedent will be established and soon our beautiful riverscape and bosque will become an ugly corridor of power lines and pipelines. There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico. Our wildlife corridor, the Rio Grande River and it's bosque are priceless treasures that we must protect. BURY THE LINES near the Ri
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: excessive local groundwater pumping which is impairing the San Pedro River system along with the impacts of increasing drought and climate change, these cumulative impacts to the San Pedro River, adjacent lands and resources must be addressed along with the critical need to protect and conserve these rare and declining resources.
146	Protecting the wolves, which we have had sightings of since they've been recently introduced back to the area. Along with mountain lion, desert bighorn sheep, elk, pronghorn antelope and Golden Eagles, (like the pair we saw on our land). We care about the diverse species of insects and plants unique to the land. Don't forget the NM Meadow Mouse and other endangered species.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
147	We appreciate that it appears SunZia chose to move the location where its power line will cross the Rio Grande River north after concerns about siting it in proximity to the Bosque del Apache National Wildlife Refuge were raised in 2015. These concerns centered on the fact that the River is a very important migratory corridor and Bosque del Apache is an important wintering ground for birds like Sandhill Cranes, geese, ducks, and raptors like hawks and eagles. The height of the lines guarantees that birds will collide with them insuring their deaths and potentially starting fires in the bosque forest as their remains plummet to the ground.
147	However, placing the line further north will still imperil these migratory birds which also use other important bird areas along the Rio Grande such as the Bernardo Waterfowl Management Area and the Whitfield Wildlife Conservation area. The same concerns for wintering birds will apply. These birds fly daily to and from feeding and roosting grounds and will be risking their lives each time they do it in the proximity of the power line. Waterfowl and raptors are the largest birds that could be affected, but smaller birds are at risk also. North America has lost nearly 3 billion birds since the 1970's representing a third of the overall avian population. Every single negative impact cumulatively adds to this alarming decline. In addition to being a migratory corridor, in our warming world and age of persistent drought, the river offers a life line of water and riparian trees to birds and other wildlife. The riverine forest of Cottonwoods is extremely important for biodiversity in our arid state. The Middle Rio Grande riparian habitat hosts 270 species of birds with just about 1/3 of them breeding in the valley, over 60 species of mammals and 11 species of bats in addition to turtles, reptiles, amphibians and invertebrates. In our current age of mass extinction, we can no longer take the long term survival of these species for granted.
150	The transmission line will have a negative visual impact, will cause the unnecessary deaths of many birds, decrease economic values along the river and discourage tourism in these very unique environments. To minimize the environmental and economic impact, the lines need to be buried.
153	Biological Resources There are many environmental studies and reports on the areas of New Mexico and Arizona that will be affected by the SunZia proposal. These regions hold significant indigenous species of plants, mammals, and other animals, including mountain lions in the Sierra Ladrones; the endangered Mexican Wolf (which is making a comeback in the area); countless migratory bird, insect, and other populations that use the region for important seasonal thoroughfares (National Geographic interactive map; National Fish and Wildlife Foundation annual report); and - among other examples - the Socorro Springsnail, found only in Socorro County, New Mexico. This tiny freshwater snail, a minute mollusk, is considered the most endangered of all animals in the state of New Mexico. Any basic google searches of these areas and the prolific and unique ecosystems they support would save someone at SunZia or the BLM a caboodle on research and surveying for the Environmental Impact Statement. At what point would the impact on these and other organisms stall the project? What recourse will there be when the adverse effects of the project inevitably alter these bioforms?

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153	Wildland Fire Ecology and Management What about wildfire protections? Power lines are one of the top causes of wildfires in western areas like the SunZia corridor, which - like many similar environs - is already greatly at risk from drought and other variable threats that increase fire potential. Gas and electric companies can face lawsuits for their responsibility in igniting wildfires and endangering, maiming, and killing animals and humans, as well as their habitats. Every year in recent memory, the wildfire seasons have been more devastating than the ones before. Currently, there are hundreds of thousands of acres burning across the proposed SunZia project area. It seems ill-advised to increase this risk.
153	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?
156	Having re-read the Audubon NM comments from 08-22-2012 (Comments from Audubon NM on the Proposed Sun Zia SW Transmission Project DEIS), I conclude that the arguments against an aerial crossing of the Rio Grande remain even with the improved more northerly siting. There is evidence that the Rio Grande flyway is in decline since the earlier DEIS which makes these arguments stronger. An underground crossing is the preferred alternative and is technically feasible. The additional cost should be distributed to the state of New Mexico, rate payers, Sun Zia and other stake holders.
157	Avoiding harm: We commend the BLM and SunZia for the 2015 siting decision that avoids a proposed route through Aravaipa Canyon (Subroutes 4A and 4B), which would have had the greatest harm to Arizona's irreplaceable wild lands. Along the chosen route through Arizona, however, we remain concerned about impacts to irreplaceable environmental and cultural values in the San Pedro River valley. By choosing this highly problematic alignment, BLM and SunZia have exacerbated the ongoing controversy around approval and construction of this transmission line, and have increased the need for other mitigation measures.
157	Offsetting unavoidable impacts: Overall, we find the mitigation offsets described in the original 2013 EIS and the 2016 ROW grant processes to be inadequate to adequately compensate for unavoidable impacts. The 2016 ROW, for example, only required offsets for a small number of acres in Designated Critical Habitat of federally listed Endangered Species. These handful of acres represent a tiny fraction of the acres that will be exposed to watershed disturbance and habitat degradation from construction and maintenance of this powerline and its associated infrastructure. Our 2015 letter to the Arizona Corporation Commission describes these un-mitigated impacts in detail. This amendment is an opportunity to evaluate a broader suite of potential mitigation measures, from avoidance to offsets. Specific to road impacts, adding permanent road miles and an expanded footprint to the right-of-way would cause additional ongoing impacts; this network should be examined for least-harm alternatives, and then considered in offset calculations. These impacts will be cumulative to impacts of the road network and construction footprint already described in the 2015 EIS. Because habitat/watershed degradation often has non-linear effects, the most robust approach for this amendments NEPA process would be to conduct an analysis of mitigation options for the full set of roads, construction disturbance, and other infrastructure not just the most recent proposed changes.
158	General and special-status wildlife species, including Threatened and Endangered Species and their habitat The area along the Riley/SRR route is home to many species of wildlife because of its remoteness and large undeveloped areas. The endangered Meadow Jumping Mouse is down along the Rio Grande Southeast of Riley/SRR, North of Riley/SRR in the Jemez, and Southwest of Riley/SRR on the Mogollon Rim. It would not be a stretch to say that they exist in the Riley/SRR area but they have not been surveyed. The Riley/SRR Route around Ladron is wholly contained within Socorro County, which is critical habitat for the Meadow Jumping Mouse. The Mexican Spotted Owl also makes its home in Socorro County, NM. The Riley/SRR Route comes within 10 miles of Spotted Owl habitat at its southernmost point. Spotted Owl habitat is to the east in the Manzanos, south in the Magdalenas, and to the north at Mt. Taylor. Riley, Ladron, and the Bear Mountains are all between these three points and could provide additional habitat for them.

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158	Two other endangered and threatened bird species, the Yellow Billed Cuckoo and the Southwestern Willow Flycatcher also make their home just east of the route along the Rio Grande. Given that the Rio Salado is a tributary of the Rio Grande and that this Route is close to the Rio Grande it is very possible that these two species use the Rio Salado riparian environment as a habitat and as a flyway. There are many raptors in the area, including golden eagles and nighthawks, which the lines could be hazardous to in flight. There are many other threatened and endangered species near this route in Socorro County, shown in Appendix A from the NM Bison-M system. Desert Bighorns, which were on the brink of extinction at one point in time in New Mexico have done well in the area near the Riley/SRR Route. They are still a fragile mammal that requires extensive management and significant range. One of the most endangered mammals in the United States, the Mexican Gray Wolf also has its range nearby. <sup>7</sup> Members of our community have spotted wolves near Santa Rita Ranches. Figure 3 shows just how close the wolves range is to the proposed Riley/SRR Route. It's well documented that roadways negatively impact local wildlife, their movement, habitat and population, so it stands to reason the transmission lines will as well (in and of themselves) in addition to the access and maintenance roads that will be required to reach them. Generally, the landscape resistance that affects the movement of these animals is low in this area, but a large unnatural set of objects could have a detrimental effect and increase the habitat fragmentation
158	Recommendation 5: The BLM should deny the request for Component 3 Alternate 1, the Route around Ladron that goes in a 60.6 miles loop, then through the community of Santa Rita Ranches. The extra and unnecessary length of this route is very damaging to the environment. It treads upon nearly unspoiled landscape adjacent to the Ladron Wilderness Study Area and through the community of Riley/Santa Rita Ranches, which has cultural and historical significance. It also would traverse the foothills of the Bear Mountains in Cibola NF, which are for the most part a roadless area. It is also in close proximity to the Rio Salado a stream that feeds the Rio Grande and a riparian habitat for plants, birds, and animals
158	Recommendation 12: The BLM should deny the request for Component 3 Alternate 1. There are many threatened and endangered animal species along or near this path. If the BLM continues to view this as an option, then the BLM should determine with field surveys, like those described in Recommendation 11, whether or not any of these threatened and endangered species are in or near to the impact path of the transmission lines and determine what impact if any the project would have on their habitat, the corridors they travel, and what other effects these placement of these towers and transmission lines would have on them and other animals in that area, including increasing landscape resistance near the towers. Particular attention should be paid to raptors and other birds that might come in proximity to those lines, which may do them harm. Desert Bighorns are doing well in the area. It should be determined if the transmission lines would impact them or change the landscape resistance restricting their freedom of movement. Having seen bear tracks, mountain lion tracks, and knowing that there are wolves not too distant, particular care should be taken to ensure that there is not a detrimental effect on them. This is especially true for the Mexican wolves, which are extremely endangered. The comment would also apply to other paths under consideration, present paths and future paths.
161	We are concerned about the impact to Sandhill Cranes of the proposed route for SunZia Southwest transmission line near Socorro, New Mexico. Bosque del Apache and the surrounding area near Socorro are the critical wintering areas for thousands of Greater ( <i>Antigone canadensis tabida</i> ) and Lesser Sandhill Cranes ( <i>A. c. canadensis</i> ) from October-March. The proposed transmission line directly bisects the Sandhill Cranes migration path to and from their breeding grounds in the northern Rocky Mountains and could present an obstacle during their biannual migration. Sandhill Cranes roost in the small lakes and the Rio Grande River at night nearby Bosque del Apache NWR and Socorro and fly out to feeding areas in nearby fields during the day.ost documented powerline collisions with birds involve transmission lines
161	A comparable study of Sandhill Crane collisions with transmission lines at a critical migration stopover site along the Platte River in Nebraska found Sandhill Cranes dying due to collisions with transmission lines. This study also found that two different line markers along the transmission lines did not prevent collisions because the collisions generally occurred at night when the markers had little effect. Therefore, markers are unlikely to solve issues with Sandhill Crane collisions with the proposed transmission line. The revised routes north of Socorro and proposed infrared lighting may help alleviate some of these issues, but the number of transmission lines in this revised route and its location poses a significant threat to Sandhill Cranes on their wintering grounds. Lights on transmission lines must be robust to avoid collisions at night and during low visibility.
161	Sandhill Cranes have been using roosting and feeding areas in this area for thousands of years, and cranes have high site fidelity to seasonal ranges. Southwestern Power Group mentions purchasing property to establish feeding areas closer to the river to reduce bird movement during the day. However, there are no guarantees that cranes will utilize new foraging areas, nor that the transmission lines would not be crossing their daily routes to and from foraging and roosting areas, nor that new threats to cranes wont develop due to changing foraging areas after completion of this project. A

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161	According to a study on winter roosting and foraging locations, Greater Sandhill Cranes had shorter foraging flights than Lesser Sandhill Cranes and areas within 5km for Greater Sandhill Cranes and 10 km for Lesser Sandhill Cranes of roosting locations should be considered habitat. We are concerned that the proposed transmission lines are entirely too close to known Sandhill Crane roosting areas and that foraging habitat will be degraded or lost due to the installment of transmission lines so close to their roosting areas.
161	Thus far, there is no mention of intensive monitoring of Sandhill Crane populations and movements along the transmission corridor and immediate area once the transmission line is constructed. Monitoring for at least 2 winters after construction would help inform future projects and identify any effects of the transmission line on Sandhill Cranes.
162	My concern with the Sun Zia Transmission lines is the east west line crossing over the Rio Grande River, and the danger it presents to the Migrating Geese and Sandhill Cranes who have been following this major Migratory route for thousands of years. I would think that the Sun Zia project would consider this seriously and do the right thing and bury the lines at the Rio Grande and San Pedro Crossings. This simple solution could avoid massive avian deaths.
163	Alternative Route 1 would cut off the Sierra Ladrones Wilderness Study Area (WSA) and the Ladron Mountain / Devils Backbone Complex Area of Critical Environmental Concern (ACEC) from important habitat in the Bear Mountains, e.g., the Scott Mesa Inventoried Roadless Area (IRA), and the Sevilleta National Wildlife Refuge. The impacts of such a disruption in wildlife corridors are incompatible with the goals of a WSA or ACEC and would need to be fully studied and addressed by a new EIS.
163	Alternative Routes 2 and 3 would constitute significant disruptions in wildlife corridors and habitat within the Sevilleta National Wildlife Refuge and are incompatible with the goals of the refuge.
163	The Rio Grande Corridor is a keystone flyway for hundreds of migratory species, including raptors, water birds, and others. It is also home to many rare and endangered species. The tall transmission lines (in addition to construction activity) in Proposed Reroutes 2 and 3 will significantly impact the Rio Grande Corridor. The BLM and cooperating agencies would need to conduct a thorough analysis of the impacts of such transmission lines on birds in a new EIS.
164	Third, the environmental impact would be tremendous, if not devastating. This area has had re-introduction programs of Big Horn Sheep and Mexican Grey Wolves. Elk, Antelope, Deer, Coyote, Black Bear, Mountain Lion, and Oryx are among the many herd animals that either migrate through this area, or are indigenous to this area. Migratory birds such as the Sand Hill Crane, Western Tanager, Black Headed Grosbeak, Black Capped Orioles, and many specimens of Hummingbird, all traverse the land of and around SRR. To run a full scale infrastructural project through these lands could potentially disrupt the migratory paths of many of these species, at the very least, and at the very worst cause some of these species to become endangered. Again, federal investigations and studies would need to be done, whereas using the already established route through Sevilleta would seem like a better solution to SunZia's routing.
165	Of particular note are.....concerns about: c) impact on endangered and threatened species: d e) overall health and safety concerns for both humans and wildlife.
165	Of particular note are ... concerns about: e) overall health and safety concerns for both humans and wildlife.
169	Profits they make there will kill birds and further degrade land and impact negatively a wildlife corridor that, if managed well, is priceless.
176	The Middle Rio Grande represents the narrowest section of one of the most important migratory corridors in North America. Approximately 400 species of birds will migrate through, winter, or breed in the Middle Rio Grande (MRG) .. many flying thousands of miles to and from wintering and nesting areas in Canada, Montana, Idaho, Wyoming, Utah, Colorado and Mexico. The Important Bird Area (IBA) program, coordinated in the U.S. by the National Audubon Society and in other parts of the world by Bird Life International, enables scientists to identify places essential to birds for breeding, wintering or migrating. New Mexico currently has 62 MAs, several of which are in the MRG including Bosque del Apache National Wildlife Refuge, Ladd S. Gordon Waterfowl Complex (composed of the Belen, Casa Colorada, Bernardo, and La Joya Waterfowl Areas), Valle de Oro National Wildlife Refuge and the Rio Grande Nature Center. During spring and fall migration, the shorelines, mudflats, and sandbars of the Rio Grande provide important feeding grounds for migrating shorebirds and waterbirds that need to refuel during their journey along the river corridor. The waters of the Rio Grande in this area also support valuable riparian forests and marshes which host breeding populations of many neotropical migrants such as warblers, tanagers, and flycatchers, and these same riparian habitats are critical migration stopovers for waterfowl and other species that breed farther north.

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176	<p>While significant efforts have been made to quantify the impacts of transmission lines crossing the Rio Grande on a few iconic and endangered species such as the Sandhill Crane, Southwestern Willow Flycatcher, and Yellow-billed cuckoo, the impacts to 99% of the other species of the Intermountain West that migrate, winter or breed in the MR.G have either not been studied or are not well known. Along with the Rocky Mountain population cranes, the Middle Rio Grande Valley plays host to hundreds of thousands of migrating and wintering waterbirds and countless breeding and migratory neotropical migrants and raptors. While we are developing a better understanding of the potential dangers that high voltage transmission lines would pose to the Sandhill Cranes, we have little data or understanding of how the other 400 species of birds (bats and other wildlife) would be impacted by high voltage power lines bisecting this continentally important migratory corridor. It would be completely unscientific and unacceptable to assume that the impacts to 99% of the bird species that migrate through, winter, or breed in the MGR won't be impacted by SunZia's overhead transmission lines, nor would it be scientifically sound to make inferences on the impacts to a majority of these birds based on data collected on a few species. Without having sufficient data on the impacts that these overhead lines would have on a majority of birds and other wildlife that will encounter them, there is presently no way of accurately quantifying the overall impacts to wildlife or determining the true mitigation requirements for any of the overhead alternatives being proposed. It seems imperative to us that there be additional studies and data collected on a larger sample size of the avian population that will encounter, and could be impacted, by the overhead Sun Zia transmission lines at all three proposed alternative crossings. Assumptions with regard to other species simply can't be made based on data collected on Sandhill Cranes and the two endangered species. At the very least this sample size should include the ranges and movement patterns of bird species included on the Partners in Flight Species of Continental Importance, Intermountain West Priority Species, as well as all the bird species listed by the NMDG&amp;F and USFWS as threatened or species of management concern in the MRG. It is important to recognize that in many areas detailed information is lacking, and that absence of information is not an indication of the absence of use or impacts to wildlife. Without more data on the potential impacts to more species of birds, bats and other wildlife, the only feasible alternative with regard to these proposed routes would be to bury the transmission lines under the Rio Grande and its historic floodplain. If the lines were buried at any of the proposed alternative routes, the impacts to wetland and riverine habitat would be minimal and quantifiable, the collision impacts to waterfowl and Sandhill Cranes would be eliminated, and it would be unnecessary to address the data gaps regarding the majority of bird species that utilize the MRG.</p>
176	<p>Bosque del Apache NWR. was established using the authority of the Migratory Bird Conservation Act (16 U.S.C. 712d) of 1936, to provide refuge and breeding grounds for migratory birds and other wildlife as well as incidental fish and wildlife-oriented recreational development, the protection of natural resources, and the conservation of endangered species or threatened species. Sevilleta NWR. and the Ladd S. Gordon Waterfowl Areas managed by the New Mexico Department of Game &amp; Fish were established afterward with a similar purpose - to conserve remnants of habitat in the face of landscape fragmentation. Sun Zia transmission lines crossing the MRG would further fragment the habitat continuity and habitat restoration efforts to which state and federal agencies have made significant investments since 1936.</p>
176	<p>With the help of funding through the North American Wetland Conservation Act (NA WCA), the Valle de Oro NWR was established in 2015 in Bernalillo County to create additional habitat and add habitat continuity to the suite of other federal, state and private lands in the MR.G for migrating and breeding birds. In addition to the acquisition of the Valle de Oro NWR, these NA WCA funds - secured and managed by Rio Grande Return and New Mexico Wildlife Federation - have been used to restore and enhance 3,486 of acres of habitat within the aforementioned state Wildlife Management Units (WMU) and federal refuges within the MR.G. Perhaps most importantly, a portion of the NA WCA funding has gone to the protection of 1,300 acres of key habitat on private lands through conservation easements to help alleviate habitat fragmentation by preserving and enhancing some important lands between the federal refuges and state WMU's. Most of these conservation easements are in the MRG, most are proximate to the Rio Grande, and several are in close proximity to the proposed Sun Zia routes - La Joya Fanns most significantly. We are concerned that these ongoing efforts by Rio Grande Return and more than 50 partner stakeholders to address the increasing fragmentation of the remaining suite of wetlands in the MRG will be further compromised by overhead transmission lines that would cross the Rio Grande anywhere in the MRG.</p>

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176	<p>In 2019, the Management Board of the Intermountain West Joint Venture (IWN) designated the Middle Rio Grande as one of five priority areas for the 12-state intermountain region they represent.... The recognition of the continental importance of the MRG as a IWN focal area isn't surprising as the hundreds of thousands of birds that migrate through 517,502 square miles of the Intermountain West (Montana, Idaho, Wyoming, Utah, &amp; Colorado) are funneled through the historic floodplain of the MRG that in most stretches measures less than one mile in width. There is likely no place in the continental United States that a transmission line would have a greater negative impact on migratory birds than the MRG. The impacts to wildlife may differ slightly with regard to the three alternative routes proposed in this EIS where the Sun Zia transmission lines would cross the MRG, but in the context of how important it is to preserve the integrity of this narrow stretch of migratory corridor to the numerous agencies, organizations, and landowners working on behalf of the hundreds of species of birds occupying seven states and three countries, fully understanding the consequences of compromising this corridor in any way takes precedence to the pros and cons of specific crossings and for so many of us remains the overarching concern.</p>
176	<p>The State of New Mexico has developed a Long-range Management Plan for Sandhill Cranes and this species is a New Mexico Species of Greatest Conservation Need as identified in the State Wildlife Action Plan (NMDGF 2003 and 2006). However, the primary authority for management of the species lies with the US Fish and Wildlife Service. There is one species of crane found in New Mexico, the Sandhill Crane (<i>Grus canadensis</i>), with three identified subspecies found in the state: Lessers (<i>G.c. canadensis</i>), Canadians (<i>G.c. rowani</i>) and Greater (<i>G.c. tabida</i>) (NMDGF 2003). Migration and wintering areas are of concern in New Mexico. These areas are described in the New Mexico Department of Game and Fish's Long-Range Plan, but, briefly, include the entire Rio Grande Valley from the Colorado line to northern Dona Ana County, the Pecos River watershed from Roswell to Carlsbad, and from Las Vegas National Wildlife Refuge in western San Miguel County southwest to the Middle Rio Grande Valley. The Middle Rio Grande Valley is a narrow corridor that is used by hundreds of thousands of migrating and wintering waterbirds. The MRG has been identified as the most critical landscape in the annual cycle of the Rocky Mountain population of Sandhill Cranes (approx. 20,000 annually in the population) due to the density of wintering birds in one location, the limited availability of foods (natural and wintering), and the small size of this wintering area (Taylor 1999). Research across all Sandhill Crane populations indicates the single most important factor regulating Sandhill Crane populations is habitat availability (Tacha et al. 1992). Understanding the importance of the MR.G valley in the context of population viability is essential when evaluating potential anthropogenic impacts. Located on the southern end of the Central Flyway and along the key migration corridor of the Rocky Mountain population of Sandhill Cranes, the Middle Rio Grande Valley, has been integral in the rebuilding and protection of this waterbird population. During the early 1900's the Rocky Mountain population of Sandhill Cranes numbers plummeted due to habitat alteration, land fragmentation, and human population growth (Taylor 1999). By the 1940's, the population was close to extinction and estimated to be fewer than 400 birds. Efforts to protect habitat, restore wetlands, and enhance existing natural and agricultural habitats in combination with sound population management practices has helped the species recover to between 18,000 and 20,000 birds annually (Taylor 1999). Recently, a subgroup of The Migratory Shore and Upland Game Bird Support Task Force focused on establishing the top priority information needs for migratory populations of Sandhill Cranes (Vradenburg, personal communication, April 2010). One of the outcomes of this effort was the finding that the most limiting landscape in the annual cycle of Sandhill Cranes, specifically the Rocky Mountain population, is the Middle Rio Grande Valley and further alterations to the valley could be population compromising. Many geographic constrictions occur in the Middle Rio Grande Valley which limit the energetic potential of the valley, concentrates the Sandhill Crane population for an extended period, and places them in proximity to large concentrations of other migratory waterbirds. Due the valley's size there are limited habitat resources for foraging and roosting which are becoming increasingly limited due to habitat conversion and degradation resulting from water loss and urbanization. There are limited opportunities for conservation (wetland and agricultural) so there is a sense of urgency to get lands protected to assure longevity of the resources needed by migrating and wintering waterbirds.</p>
176	<p>The protection of the Rio Grande Migratory Corridor is of such paramount importance that we cannot begin to consider the pros and cons of the alternative routes without first considering the alternative means of crossing this critically important flyway. The Rio Grande Return board of directors and staff insist that all alternative routes must fully consider both overhead and underground alternatives to crossing the Rio Grande Corridor. Further, we insist that all alternatives include mitigation measures based on robust scientific data that establishes the cumulative impacts of both overhead and underground alternatives to a full range of birds, bats, and other wildlife that utilize this continentally important migratory corridor.</p>

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176	Riverine and riparian ecosystems are the most productive, biologically diverse, and threatened habitats in the American Southwest (Johnson and Jones 1977, Johnson et al. 1985, Knopf et al.1988, Ohmart et al. 1988, Johnson 1991, Minckley and Brown 1994). Riparian habitats support ecological processes and diverse assemblages of distinctive species that are not found in the surrounding uplands (Stevens et al. 1977, Minckley and Brown 1994). Despite their great ecological importance, land management activities such as flow regulation and other anthropogenic activities have substantially compromised the ecological integrity of stream, wetland, and riparian ecosystems throughout North America (Minckley and Brown 1994, Dale et al. 2000) and in the MRG in particular. Estimates of riparian habitat loss range from 40% to 90% in the arid southwestern states (Dahl 1990), and riparian habitats are considered to be one of the region's most endangered ecosystems (Minckley and Brown 1994, Noss et al. 1995). Because of the increasing impacts of climate change, prolonged drought and urban development in the historic floodplain, the loss of wetland habitat in the MRG now likely exceeds the higher range of Dahl's estimates that were published in 2000. As a consequence, the hundreds of thousands of birds that have been migrating through and wintering in the MRG for millions of years are now dependent on 5% to 10% of the wetlands habitat that have supported them historically.
178	The proposed above ground transmission route will bring irreparable and permanent harm by despoiling the natural beauty and vistas of its crossing path creating undetermined hazards to migratory geese, cranes, and the ca. 400 species of birds that use the Rio Grande flyway annually.
178	Both Socorro County (9/26/2019) and Valencia County (1/20/2020) Commissions opposed the above ground crossing of the Western Spirit transmission line and now Sun Zia is petitioning to double the damage with a second line crossing in the same area of the Rio Grande. The ONLY mitigation for impacts to birds, degraded landscape, interference with the Rio Grande Trail, and the health and well-being of local residents is UNDERGROUNDING the line beneath the Rio Grande and its entire floodplain.
178	The proposed Sun Zia route will impact the Bosque del Apache wildlife refuge, Ladd S. Gordon wildfowl management area, and Sevilleta. The Rio Grande is one of the most important and fragile migratory bird corridors in western North America. The conclusion of expert ornithologist is that if you wanted to kill as many birds as possible with a transmission line, this reach of the Rio Grande is where you'd put it!
178	Birding is an especially important economic resource for N.M. Rural states have high involvements of people who become avid birdwatchers. In fact, N.M. is 28th in the nation for number of birders, with a 23% population participation rate.
184	Biological Resources There are many environmental studies and reports on the areas of New Mexico and Arizona that will be affected by the SunZia proposal. These regions hold significant indigenous species of plants, mammals, and other animals, including mountain lions in the Sierra Ladrones; the endangered Mexican Wolf (which is making a comeback in the area); countless migratory bird, insect, and other populations that use the region for important seasonal thoroughfares (National Geographic interactive map; National Fish and Wildlife Foundation annual report); and - among other examples - the Socorro Springsnail, found only in Socorro County, New Mexico. This tiny freshwater snail, a minute mollusk, is considered the most endangered of all animals in the state of New Mexico. Any basic google searches of these areas and the prolific and unique ecosystems they support would save someone at SunZia or the BLM a caboodle on research and surveying for the Environmental Impact Statement. At what point would the impact on these and other organisms stall the project? What recourse will there be when the adverse effects of the project inevitably alter these bioforms?
184	Wildland Fire Ecology and Management What about wildfire protections? Power lines are one of the top causes of wildfires in western areas like the SunZia corridor, which - like many similar environs - is already greatly at risk from drought and other variable threats that increase fire potential. Gas and electric companies can face lawsuits for their responsibility in igniting wildfires and endangering, maiming, and killing animals and humans, as well as their habitats. Every year in recent memory, the wildfire seasons have been more devastating than the ones before. Currently, there are hundreds of thousands of acres burning across the proposed SunZia project area. It seems ill-advised to increase this risk.
184	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?



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184	If that is not possible, minimize the impacts on vulnerable communities and ecosystems across New Mexico and Arizona by returning to one of the previously approved and authorized route(s) through the White Sands Missile Range (WSMR) or the two alternate paths through the Sevilleta National Wildlife Refuge, which use existing rights-of-way and therefore would make less of an impact along undeveloped routes and pristine properties across New Mexico and Arizona.
185	As with other linear projects, the Department recommends consideration of potential impacts to wildlife movement corridors, outdoor recreation (e.g., hunting, hiking, camping, and wildlife watching), deposition and/or spread of noxious and invasive weeds, and habitat fragmentation. Enclosed is a report from the Department's online Environmental Review Tool (ERT) prepared specifically for the SunZia Southwest project access roads and temporary work areas outside the granted ROW, and the SunZia West Substation. Within the report are lists of special status species documented within two miles of the project vicinity, special areas that intersect with the project footprint, Species of Greatest Conservation Need (SGCN) predicted to intersect with the project footprint, and Species of Economic and Recreation Importance predicted to intersect with the project footprint. The ERT report is a vital information resource for your use in evaluating potential environmental impacts in Arizona.
185	A specific item to be considered in the new RMP is the golden eagle nest in the Winchester Mountains, NW of Willcox, AZ. Birds of prey such as raptors, owls, vultures, and eagles are vulnerable to electrocution and powerline strikes during construction and operation. There are a number of design features that can minimize impacts to these important species. Tuk Jacobson is the Department's raptor expert and will be willing to share information on best management practices; he can be contacted at kjacobson@azgfd.gov or 623-236-7575. Power poles can serve as perches for many birds of prey and there are design features for structures that can reduce impacts to these important species. Another possible alternative to reduce mortality is using bird flight diverters to decrease avian mortalities. Again, Mr. Jacobson has expertise in all of the best management practices and would be available to share his knowledge in the pre-design phase of this project. Additionally, the Department recommends that SunZia consider timing of construction within this area as it relates to the eagle breeding season (August to mid-December) and plan accordingly.

## Noise Comments

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32	The University of New Mexico operates the Long Wavelength Array (LWA-SV) station located at the Sevilleta National Wildlife Refuge. The LWA observes the Universe at frequencies between 3 and 88 MHz. At these low frequencies arcing from power-lines, especially high-voltage powerlines like the ones proposed by SunZia, emit broad-band emission which interferes with the operation of the radio telescope. Often powerlines start out fairly clean, but over time they become noisy as components loosen, become weathered, or damaged. Even a small amount of noise can blind our highly sensitive radio telescope that is looking at cosmic signals arriving from great distances. We point out that certain bands are specifically reserved for radio astronomy and protected against unwanted emission by the International Telecommunications Union (ITU). These include 73-74.6 MHz in Regions 1 and 3, 37.5-38.25 MHz (all regions) and 25.550-25.670 MHz, and 13.360-13.410 MHz in Region 2 (US). The 5.149 bands are take all practicable steps to protect and according to ITU-R 769 the harmful interference threshold is -195 dBW at 74 MHz. Although detailed propagation models can be complicated, as a general rule, high voltage lines (over 100 kV) should not be located within 10 miles of a radio telescope.
95	Our property values will be impacted due to the close proximity to these power lines as well as the unsightliness of them not to mention the noise as there is ZERO ambient noise
139	Furthermore, the ambient noise and light from these towers would also disturb both the wildlife and local residents. It really would ruin the essence of the area. I know only one person from the Scoping meetings said they'd visited Riley. Its so quiet out there that the silence becomes loud, like the whole worlds trying to fit in your eardrums at once. And there's so little light pollution that you can see milky way dust and the stars are like a billion gemstones strewn across the night sky. It saddens me greatly to think of that lost.

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153	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?
158	Other Environmental Factors Electromagnetic Interference (EMI) Corona generation and gap discharges from electric power transmission lines generate radio noise during their normal operation. These discharges can create EMI that can affect all types of electronics including cell phones, radios, and TVs. There are even studies that show the EMI can have detrimental health effects. Due to the remoteness of Riley(Santa Rita), it is already difficult to obtain a cell signal due to topographic effects, being on the fringe of coverage, and frankly being on the wrong side of geography from where cell phone providers earn their revenue, i.e. population centers. One of the most renowned radiotelescopes in the world, the Very Large Array is approximately 25 miles from this route. Radiotelescopes are extremely sensitive to EMI of all kinds. EMI can affect nearby vegetation. EMI is a noise to radio signals. One might call it the invisible pollution of the radio spectrum.
158	Audible Noise The community of Santa Rita Ranches is extremely quiet. It is part of its attractiveness. When you are standing on a wind free day, it is extremely quiet. Due to corona discharge and other factors, power lines make noise. Weather events can even cause the transmission lines to make more noise. Noise is known to cause stress. Animals tend to be more sensitive to noise because many animals use their sense of hearing to find food, find each other, and avoid predators. Noise pollution in such an free environment is yet one more detrimental effect on this mostly pristine ecosystem.
184	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?

## Recreation Resources Comments

Submission Number	Comment Text
44	If the EIS process recommends the approval of line construction in any form, it's imperative that the EIS identify conservation properties in the immediate project area that the applicant must be required to purchase and donate to public agencies to mitigate the projects effects on wildlife, hunting, birdwatching and other recreation.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
147	This placement will also have impacts on the quality of experience for users of the Rio Grande Trail, a long distance trail that follows the river through New Mexico from the Colorado to the Texas Border. The building of this trail is in progress and it promises to provide users with a tapestry of diverse natural habitats and striking landscapes while contributing to the economic prosperity of the surrounding counties. Placing the power line and its enormous towers over the river where they can be seen for miles will industrialize the area and degrade that experience. Plus, in the future, other power lines may follow in a similar path adding to this degradation. Burying the line so that it crosses under the river is technologically feasible and will eliminate all of these problems.

Submission Number	Comment Text
153	Land Use and Recreation Resources The glorious and enchanting landscapes of the areas through which SunZia would like to place their 135-foot high-voltage power lines should be walked and experienced by everyone who plans to desecrate them for southern California's air conditioning needs. The acreage is home to mountains, rivers, valleys, outcroppings, mesas, and other land and water forms that would be irreparably damaged if the proposal proceeds. Other than individual families and landowners, public access and enjoyment for the many visitors who escape to these beautiful pristine scenes will also be impacted. Once the landscape is altered, even with enough money, we would not be able to reform peaks, waterways, and ecosystems to their current natural majesty. Other than the obvious economic increases that will benefit certain investors and populations, what will local flora and fauna including humans gain from the destruction of their land and recreational areas?
184	Land Use and Recreation Resources The glorious and enchanting landscapes of the areas through which SunZia would like to place their 135-foot high-voltage power lines should be walked and experienced by everyone who plans to desecrate them for southern California's air conditioning needs. The acreage is home to mountains, rivers, valleys, outcroppings, mesas, and other land and water forms that would be irreparably damaged if the proposal proceeds. Other than individual families and landowners, public access and enjoyment for the many visitors who escape to these beautiful pristine scenes will also be impacted. Once the landscape is altered, even with enough money, we would not be able to reform peaks, waterways, and ecosystems to their current natural majesty. Other than the obvious economic increases that will benefit certain investors and populations, what will local flora and fauna including humans gain from the destruction of their land and recreational areas?
185	As with other linear projects, the Department recommends consideration of potential impacts to wildlife movement corridors, outdoor recreation (e.g., hunting, hiking, camping, and wildlife watching), deposition and/or spread of noxious and invasive weeds, and habitat fragmentation. Enclosed is a report from the Department's online Environmental Review Tool (ERT) prepared specifically for the SunZia Southwest project access roads and temporary work areas outside the granted ROW, and the SunZia West Substation. Within the report are lists of special status species documented within two miles of the project vicinity, special areas that intersect with the project footprint, Species of Greatest Conservation Need (SGCN) predicted to intersect with the project footprint, and Species of Economic and Recreation Importance predicted to intersect with the project footprint. The ERT report is a vital information resource for your use in evaluating potential environmental impacts in Arizona.

### Lands with Wilderness Characteristics Comments

Submission Number	Comment Text
141	The BLM should analyze a route that would construct the SunZia transmission line parallel to and in the same disturbance area as Highway 60, east-west, and parallel to and in the same disturbance area as I-25, north-south. This alternative would provide the most minimal impact possible to Seville, the Sierra Ladrones Wilderness Study Area (WSA), and a citizen inventoried land with wilderness characteristics (LWC) just west of Sierra Ladrones. This citizen inventoried LWC is in the southern Sierra Lucero, just west of the Sierra Ladrones WSA, and totals about 10,700 acres without any structures or roads beyond a couple of fences that do not negatively impact the apparent naturalness of the area. Utilizing already disturbed areas whenever possible would better serve to limit the environmental and destructive impacts of construction and operation of this transmission line, and ought to be considered fully alongside the more disruptive alternatives across the Seville and the Sierra Ladrones.
158	In close proximity to the Riley/SRR Route, is the Ladron Wilderness Study Area. Much of the route is not officially designated as Wilderness or WSA, but is a land with wilderness characteristics just the same, being adjacent to or encroaching upon the WSA. The route also runs through or adjacent to Cibola NF in the foothills of the Bear Mountains, which are also nearly pristine roadless areas. This local part of the Cibola NF is a land with wilderness characteristics. The disruption to these two pristine landscapes would be immeasurable as they are in a natural state and provide habitat for many animals, birds, and plants that are fragile in this desert environment.

## Special Designations Comments

Submission Number	Comment Text
115	This route is the longest of the three proposed routes, and would diverge approximately 13 miles to the west in order to avoid the Sevilleta National Wildlife Refuge (Sevilleta) and BLM specially designated areas, but would require traversing a portion of the Cibola National Forest that includes an Inventoried Roadless Area. This route would also result in the greatest amount of habitat disturbance, as it would traverse through a large area of remote relatively undisturbed habitat. This proposed route would also travel through a portion of desert bighorn sheep ( <i>Ovis canadensis nelsoni</i> ) habitat in the vicinity of Ladron Peak. The EIS should evaluate possible impacts to the desert bighorn sheep population, particularly if construction activities will occur during the rut and lambing season. Seasonal restrictions may need to be implemented, however; the Department currently lacks sufficient data on this population of desert bighorn sheep to fully assess the projects potential impacts.
134	11) Analyses of route alternatives through Sierra Ladrone Wilderness Study Area must fully detail the impacts on the wilderness study area. The analysis must fully detail mitigation factors, such as proper siting, that would prevent impairment of the areas suitability for wilderness designation.
141	The BLM should analyze a route that would construct the SunZia transmission line parallel to and in the same disturbance area as Highway 60, east-west, and parallel to and in the same disturbance area as I-25, north-south. This alternative would provide the most minimal impact possible to Sevilleta, the Sierra Ladrone Wilderness Study Area (WSA), and a citizen inventoried land with wilderness characteristics (LWC) just west of Sierra Ladrone. This citizen inventoried LWC is in the southern Sierra Lucero, just west of the Sierra Ladrone WSA, and totals about 10,700 acres without any structures or roads beyond a couple of fences that do not negatively impact the apparent naturalness of the area. Utilizing already disturbed areas whenever possible would better serve to limit the environmental and destructive impacts of construction and operation of this transmission line, and ought to be considered fully alongside the more disruptive alternatives across the Sevilleta and the Sierra Ladrone.
146	We care about protecting the wilderness areas and protecting them from erosion which can destroy habitat and species, then disrupt and pollute the water. We want the rivers like the Rio Grande and Rio Salado and arroyos and mesas protected from erosion and destruction.
153	Special Designations Much of the land to be trespassed by the SunZia project, as well as the surrounding areas, are already protected and have/will require special designations to interrupt. Why bother forming and protecting areas like the Sevilleta and Bosque Del Apache National Wildlife Refuges; the Sierra Ladrone Wilderness Study Area; the Cibola, Gila, Coronado, and other National Forests; Saguaro National Park; and so many others if a company like SunZia can come in and get special designations for use despite the many likely and negative environmental impacts?
153	Wilderness As mentioned in the special designations section, so much of the area that the SunZia project will pass through is already protected wilderness, research areas, designated habitat, and more. Why bother going to the trouble of delineating preservation areas if they cease to be protected for the right dollar amount?
158	Recommendation 5: The BLM should deny the request for Component 3 Alternate 1, the Route around Ladron that goes in a 60.6 miles loop, then through the community of Santa Rita Ranches. The extra and unnecessary length of this route is very damaging to the environment. It treads upon nearly unspoiled landscape adjacent to the Ladron Wilderness Study Area and through the community of Riley/Santa Rita Ranches, which has cultural and historical significance. It also would traverse the foothills of the Bear Mountains in Cibola NF, which are for the most part a roadless area. It is also in close proximity to the Rio Salado a stream that feeds the Rio Grande and a riparian habitat for plants, birds, and animals
163	Alternative Route 1 would cut off the Sierra Ladrone Wilderness Study Area (WSA) and the Ladron Mountain / Devils Backbone Complex Area of Critical Environmental Concern (ACEC) from important habitat in the Bear Mountains, e.g., the Scott Mesa Inventoried Roadless Area (IRA), and the Sevilleta National Wildlife Refuge. The impacts of such a disruption in wildlife corridors are incompatible with the goals of a WSA or ACEC and would need to be fully studied and addressed by a new EIS.
184	Special Designations Much of the land to be trespassed by the SunZia project, as well as the surrounding areas, are already protected and have/will require special designations to interrupt. Why bother forming and protecting areas like the Sevilleta and Bosque Del Apache National Wildlife Refuges; the Sierra Ladrone Wilderness Study Area; the Cibola, Gila, Coronado, and other National Forests; Saguaro National Park; and so many others if a company like SunZia can come in and get special designations for use despite the many likely and negative environmental impacts?

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### Socioeconomics Comments

Submission Number	Comment Text
7	The true economic impacts of the line should be considered. Not just the positive ones like short term construction jobs for out-of-state linemen, but the negative effects on private property owners and the local communities including: reduced property values. Reduction in tourism due to bird kills and degraded landscape. Loss of film industry interest due to degradation of viewscape and landscape.
7	Loss of grants to support projects that maintain and improve eco-tourism such as hiking, biking, hunting, and birding.
8	This project will seriously impact my property value without recompense. Who wants to buy land with a mega transmission line?
8	Of concern also is the crossing of the Rio Grande and the impacts on migrating birds and the local tourism economy. Socorro County depends on these tourism dollars and the negative impact of news stories of dead sandhill cranes will seriously harm an already fragile economy. I
12	There is also the loss of property values to local homeowners and businesses.
12	There is a good amount of eco-tourism in the proposed area that is beneficial to local business owners and those not so close. We came from Florida to visit the Bosque del Apache area to view the birds. We spent nearly 10 days in the area supporting the motels, restaurants and other shops. The festival is a life-blood to many small businesses in the area. While there may be short-term gain from construction, when the project is complete, the area will be bereft of tourism.
17	The true economic impacts of the line should be considered. Not just the positive ones like short term construction jobs for out-of-state linemen, but the negative effects on private property owners and the local communities including: reduced property values. reduction in tourism due to bird kills and degraded landscape. loss of film industry interest due to degradation of viewscape and landscape
17	Loss of grants to support projects that maintain and improve eco-tourism such as hiking, biking, hunting, and birding.
28	Some 400 species of birds use the middle Rio Grande either year-round or seasonally, including species such as ducks important to hunters as well as endangered species (e.g., yellow-billed cuckoo, southwestern willow flycatcher) and species which draw tourists. The continued presence of all these bird species thus has an important economic impact on towns such as Socorro, which hosts the annual Crane Festival.
44	The EIS must fully explore the economic impacts of the proposed line, including the negative impacts on private property owners and local communities. The EIS must evaluate the following economic effects: _ Reductions in property values; _ Reductions in tourism due to bird kills and degraded landscape; _ Reductions in future film industry revenues due to degradation of the viewscape and landscape; _ Reductions in future grant revenues to conservation groups and ecotourism groups that rely on undiminished hiking, biking, hunting and birding.
80	The refuge is also the lifeblood for the economy of the surrounding area. The Sun Zia transmission lines threaten the sustainability of the Bosque del Apache Wildlife Refuge in its healthy state.
80	Sun Zia transmission lines would deal a big economic blow to the successful and burgeoning ecotourism economy of the region. The flyway for migrating birds bottlenecks over this region. Birders from all over the US and the world flock here to experience the amazing sandhill crane migration. SunZia transmission lines would irreparably damage this corridor.

Submission Number	Comment Text
80	The SunZia Southwest Transmission Project would cripple the ability of Intermountain West Joint Venture to raise funds to pursue its worthy goals.
80	The SunZia project would also damage the fund-raising capacity of the advocacy groups of Bosque del Apache and Sevilleta Wildlife Refuges.
81	How many jobs will stay in the affected areas and how many existing jobs will be lost? We heard during the scoping hearing that there will be only 44 permanent jobs for the entire completed SunZia project.
81	What part of the existing economy in agriculture will be replaced by the SunZia project? Much of the proposed siting of the "lanes" would go through small, privately owned, economically viable ranches and other sustainable agricultural areas that have every potential of losing land and being split up by the "lanes" making them no longer economically viable as agriculture producers. Our small family ranch was once in the proposed path of a similar "lane". If it had gone through our small ranch our loss of usable land would have made our ranch no longer economically viable.
81	What part of the existing economy in tourism will be replaced by the SunZia project? Why would tourists want to come to the Land of Enchantment to see double lines of 200-foot-tall towers for hundreds of miles through some of the most scenic areas of New Mexico?
81	the generations-long ag uses of the land in the area of wind and solar farms is lost, skilled ag workers and landowners will also be lost along with the economic value their labors generate. If ag producers leave, they will not be coming back. The people most affected will be the small producers. Transmission lines and wind farms in the area of our own ag operation would end a business and way of life that has been sustained over five generations, has returned the land to its pre dustbowl natural state and provided income for eight different family units plus the variety of profession and businesses that supply goods and services to us and our neighbors
83	his is to register my opposition to the SunZia project. It will absolutely destroy the night sky view that Oracle residents value. My own view will be especially obliterated by your aircraft lights, significantly diminishing the value of my property. I will be horrified if this ill conceived idea is realized.
84	New Mexico has historically been an exporter of thermal-sourced power supply to markets such as California, Arizona, and Texas. As states and corporations increasingly move toward clean energy resources, the vast renewable resource potential in New Mexico creates an opportunity for the state to become a major supplier of clean energy needs of other states while continuing to serve the needs of in-state customers. In June 2020, NM RETA released findings from a landmark: Energy Transmission and Storage Study compiled by Virginia-based energy company ICF Consultants that specifically looked at this potential. The study examined the development potential for renewables to serve in-state and out-of-state demand over the next 10 years, and the transmission system alternatives that could support the interconnection of those renewables to New Mexico and export to areas of demand while maintaining system reliability requirements. Based on the findings, New Mexico has more than enough renewable energy and capacity to meet residential and business electricity demands in advance of New Mexico's Energy Transition Act's (ETA) requirement for 100% zero-carbon electricity for utilities by 2045 and rural electric cooperatives by 2050. It also identified that New Mexico's renewable capacity could expand from 2,500 MW as of the end of 2019 to 11,500 MW by 2030. This consists of 2,500 MW existing, 3,100 MW currently under development and 5,900 MW of new projects identified as a part of this study. The 11,500 MW would satisfy New Mexico's clean energy goals as well as support the goals of other states. To support the -addition of renewables at this scale, roughly 900 to 1300 miles of new transmission and supporting equipment is required. ICF Consultants identified the greatest value for transmission would be to expand capabilities to the western states. The investment made in support of renewables and transmission reflects up to \$11 billion through 2032 by project developers resulting in up to 3,700 jobs per year during peak construction plus up to 800 permanent jobs. Adding an extra transmission corridor to connect New Mexico to the neighboring markets was identified as the top priority in the Study. It also identified that existing transmission corridors were preferred over new corridors in order to minimize the need for acquisition and permitting of new right-of-way (ROW). The SunZia project meets this priority by providing new infrastructure to reach western markets with the ability to co-locate with existing infrastructure in order to minimize impacts.
86	Don't know why BLM, you and the SunZia Southwest Transmission Project would want to come through private property and take away our residences, when there are several other routes you could take not on private land, and not taking people's homes away. Lots of the other property owners at Santa Rita Ranches have retired out there, or are about to retire out there. It will be really hard to even try to find a place as great and beautiful as Santa Rita Ranches is. Just doesn't exist. Why are you singling out older poor people and taking their homes away for this project? Or even trying to force us to live around this hazardous situation which is very very dangerous and will compromise our health and our lives!!!
92	This includes investigating where the materials for the project are being sourced from and whether they are mined by unethical means.

Submission Number	Comment Text
94	It is my understanding that a recent economic impact report, conducted by Moss Adams, estimates that SunZia will create thousands of jobs in construction and operations while enabling even more wind generation employment throughout eastern and central parts of New Mexico
95	Our property values will be impacted due to the close proximity to these power lines
98	Negative Economic Impact: Rural communities are being asked to subsidize the SunZia transmission line. Previous Environmental Impact Statements have only looked at the economic benefit of construction and a few additional permanent jobs while ignoring the negative costs to the communities that the line runs through. Studies have shown that property values near high-voltage transmission lines are reduced by 10-15%. Degradation of viewsapes will reduce tourism. The New Mexico Tourism Department has found that tourism supports 12.8% of all jobs in Socorro County. The annual economic impact for Socorro County alone in 2015 was over \$60 million. Since that time tourism in the state has increased 13%. Degraded landscapes will have additional negative consequences for New Mexico's film industry and the proposed Rio Grande Trail. Conservation efforts have been ongoing for the past 20 years, bringing in substantial money to this impoverished area. Conservation partners have brought in \$5 million in US Fish and Wildlife Service-North American Wetlands Conservation Act (NAWCA) grants. The partners to these grants leveraged over \$15 million in non-federal match funds to obtain the NAWCA grants. These funds have been used to protect and restore conservation lands, utilizing local work forces to accomplish these efforts. The Intermountain West Joint Venture (IWJV) has chosen the middle Rio Grande corridor as a focal area for their Water 4 Initiative. The IWJV will help secure and leverage funding to build conservation capacity. High voltage transmission lines crossing the Rio Grande will make that much harder if not impossible, since conservation funding does not usually go to heavily impacted areas.
101	They talked in the meeting that it would provide 44 full time jobs but did not say how many would be in New Mexico.
101	If this project goes through our 89 lots will become pretty much worthless no one would buy any property after seeing those giant towers.
103	The Negative Economic Impact of the Lines needs to be objectively weighed. Rural communities are being asked to subsidize the SunZia transmission line. Previous Environmental Impact Statements have only looked at the economic benefit of construction and a few additional permanent jobs while ignoring the negative costs to the communities that the line runs through. Concerns are many, but as Friends of Bosque del Apache, our main concerns on the economic issues are: ---- Diminished viewsapes will reduce tourism which is a major economic driver in our area and in our state.. The New Mexico Tourism Department has found that tourism supports 12.8% of all jobs in Socorro County. The annual economic impact for Socorro County alone in 2015 was over \$60 million. Since that time tourism in the state has increased 13%. Bosque del Apache is a major tourist destination, and has consistently brought over \$15 million per year into our impoverished county. ---- High voltage transmission lines crossing the Rio Grande will make acquiring conservation funding much harder if not impossible. Conservation efforts have been ongoing for the past 20 years, bringing in substantial money to this impoverished area. Conservation partners have brought in \$5 million in US Fish and Wildlife Service-North American Wetlands Conservation Act (NAWCA) grants. The partners to these grants leveraged over \$15 million in non-federal match funds to obtain the NAWCA grants. These funds have been used to protect and restore conservation lands, utilizing local work forces to accomplish these efforts. The Intermountain West Joint Venture (IWJV) has chosen the middle Rio Grande corridor as a focal area for their Water 4 Initiative. The IWJV will help secure and leverage funding to build conservation capacity. High voltage transmission lines crossing the Rio Grande will make that much harder if not impossible, since conservation funding does not usually go to heavily impacted areas.
104	The 500 miles of power lines and substations will deliver up to 4,500 MW of renewable energy to many users. The economic benefits to all it effects will be huge. SunZia will generate \$1.1 billion to Arizona alone. SunZia has spent years with many entities to build consensus for the project that will benefit so many.
105	5) Include in the EIS all third-party studies related to the economic feasibility of the SunZia transmission proposal. Promotional hype by the applicant about cost effectiveness and marketability can be very misleading to the public, investors, and regulators. It is not uncommon for a speculative project to fail after adverse environmental impacts have already occurred. Disclosure of actual third-party economic feasibility studies for long distance tie-lines that purport to transport over 90% renewable energy must be included in the main body of the EIS before the next Record of Decision is considered. These highly relevant studies were buried in the public comment appendix of the last SunZia EIS, where they could conveniently be ignored by the decision makers.
105	6) Include in the EIS the stated power purchase interest of all utility partners involved in the SunZia project, such as the Salt River Project in Arizona, disclosing both the amount and source of electrical energy desired to be transported by SunZia.
111	If this alternative is more expensive, weigh it against the tourist dollars brought by me and other birders, photographers, and other outdoor enthusiasts. I think an effort should be made to retain the outstanding beauty of the Rio Grande and the ecotourism dollars it attracts.

Submission Number	Comment Text
113	Two key industries that MRGEDA is committed to expanding are renewable energy and agribusiness. SunZia will greatly benefit both industries by means of landowner payments to our farmers whose land is in the path of the transmission line and by enabling 4,500 MW of renewable energy to be brought online and transported across the state
113	Beyond directly uplifting these industries, the transmission line demonstrates our need to work collaboratively across the board to ensure the prosperity of all New Mexicans, but especially those in our rural regions who have long been the backbone of our state's economy.
113	Though our communities have long demonstrated a strength and resilience that came to light best through a global pandemic, it is time we start bringing new opportunities that ensure our families don't need to struggle to make ends meet.
114	We welcome any and all supplemental revenues created by this transmission project
116	SunZia will bring huge financial benefits for New Mexico, which don't come around very often, especially to rural areas. It is my understanding that a recent economic impact report conducted by Moss Adams estimates that SunZia will create thousands of jobs in construction and operations while enabling even more wind and solar generation employment throughout New Mexico.
134	the communities along the Middle Rio Grande benefit from bird migrations, which attract tourists to the region. The DEIS must consider and analyze the effects that the proposed relocation of the ROW will have on the communities.
134	8) Analyses of each alternative must consider the impacts on the community, such as loss of tourism revenue, impairment of visual aesthetics, and decrease in property values. An underground alternative must be fully analyzed as a means of mitigating these impacts.
135	We have heard some of our rural members express concerns that it will violate their natural rural areas and create few jobs. We have heard others speak that with the pandemic, they are in need of economic development and thus reluctantly support the project.
135	Weighing so many concerns, NM IPL would like to see that due diligence is done for the rural and vulnerable communities that may be affected most by this project. We ask that in hiring people to work on this project, if it is approved, that special preference be given to New Mexicans with attention to racially diverse and local hiring for any employment in construction and for the ongoing jobs from the project. We suggest that New Mexican companies and banks be used for the project, again as an environmental and racial justice request. Too often our state is seen as a sacrifice zone to be taken advantage of for the gain of other populations and companies, especially those who benefit outside of our state. We see these various concerns as justice and ethical considerations.
138	SunZia invented its own purpose and need as articulated by Chairman Little. Please revisit the purpose, need, and economic feasibility of this project in this new EIS, consider project abandonment as one of the alternatives,
140	Impacts I would like to see considered for Component 3--Segment 4 reroute: Possible disruptions to the aesthetics, livability, and community cohesion of existing small communities along the route due to effects of construction and operation of transmission lines.
143	There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico.
143	I write urging you to require that the proposed SunZia power lines be placed underground to mitigate the impact to birds as they use the Rio Grande River as their flyway and to reduce interference with the Rio Grande Trail. It is certain that if this is not done a precedent will be established and soon our beautiful riverscape and bosque will become an ugly corridor of power lines and pipelines. There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico. Our wildlife corridor, the Rio Grande River and it's bosque are priceless treasures that we must protect. BURY THE LINES near the Ri
145	Siting the easement on the Martins property will diminish the value of the lands, resources, and aesthetic value of the property and the nearby Santa Rita Ranches.
150	The transmission line will have a negative visual impact, will cause the unnecessary deaths of many birds, decrease economic values along the river and discourage tourism in these very unique environments. To minimize the environmental and economic impact, the lines need to be buried.



Submission Number	Comment Text
153	Social and Economic Conditions The BLM says that its vision is to enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources, but this project simply does not benefit those whose properties will be destroyed by construction of the SunZia lines. It only provides for other populations whose socio-economic status and access to resources is already at an advantage. Some of the BLMs guiding principles are supposedly to cultivate community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication. How, exactly, has the Transmission Project fulfilled these principles? What does the SunZia project do to enhance the lives of individual and family landowners, retirees, small farmers and ranchers, or nearby native populations who experience particular socio-economic difficulties different than many of their urban and suburban peers? What is proposed? In my and my family's dealings with SunZia so far, each of the above principles has been sorely unapparent. With all these concerns, what recourse is there?
153	6.) Include in the EIS the stated power purchase interest of all utility partners involved in the SunZia project, disclosing both the amount and source of electrical energy desired to be transported by SunZia and their backers and partners.
158	Consider the possibility that a stronger environmental resistance movement in California and the more significant wealth of those in California as opposed to those in New Mexico and particularly those in the counties in New Mexico that would be most affected, such as Socorro County, may have been a cost/benefit factor by these corporations as to why New Mexico was chosen as the place for this project that would send power to another state. The 2019 per capita income of a resident of California was nearly twice that of a resident of Socorro County, NM. The poverty level in Socorro County is more than twice that of California. The profits of a private corporation should not be a consideration in a decision regarding the SunZia project. New Mexico's environmental pain should not be California's gain. There is a growing and disturbing trend of cities outsourcing their power generation and transmission to rural areas. The federal government needs to facilitate healthy growth with minimal impacts to the human environment.
167	Our neighboring states are doing exactly what we are doing- installing more solar and wind. Each market area is trying to sell the same thing to its neighbor. At some point, the market next door will cease to buy because it will be generating plenty of its own. Companies such as Facebook at Los Lunas have installed their own solar farm and don't need to buy power from a wind farm or a utility. Community solar is rapidly becoming a developer's new approach- their customers will not need to buy from a utility or wind farm. Individual home owners install standalone solar systems- and they do not need to buy from a wind farm or a utility. That is the trend. But the companies who are installing current power line infrastructure don't want to look ahead. They want to complete an installation project and get paid. Has anyone at the State or Federal agency level (such as BLM) looked ahead to calculate when the alleged demand for all this power will be neutralized? I think long distance transmission will be obsolete in 10 to 20 years ,
169	The Bureau of Land Management is selling out our small, rural communities first in Escondida and now Belen that don't have resources or time or political influence to oppose them. How does the destruction of our property values and indeed our communities compare with short-term construction jobs for out-of-state linemen?
175	It is my understanding that a recent economic impact report, conducted by Moss Adams, estimates that SunZia will create thousands of jobs in construction and operations while enabling even more wind generation employment throughout eastern and central parts of New Mexico.
178	Cause economic loss to residents by lessened migratory bird related tourism and reduced personal property values.
182	SunZia will bring huge financial benefits for New Mexico, which don't come around very often, especially to rural areas. It is my understanding that a recent economic impact report conducted by Moss Adams estimates that SunZia will create thousands of jobs in construction and operations while enabling even more wind and solar generation employment throughout New Mexico.
183	The economic benefits SunZia will bring rural counties and the State of New Mexico is tremendous as outlined by the many studies over the years. I see SunZia and the associated renewable projects as a much needed supplement to local and state revenues.

Submission Number	Comment Text
184	Social and Economic Conditions. The BLM says that its vision is to enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources, but this project simply does not benefit those whose properties will be destroyed by construction of the SunZia lines. It only provides for other populations whose socio-economic status and access to resources is already at an advantage. Some of the BLMs guiding principles are supposedly to cultivate community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication. How, exactly, has the Transmission Project fulfilled these principles? What does the SunZia project do to enhance the lives of individual and family landowners, retirees, small farmers and ranchers, or nearby native populations who experience particular socio-economic difficulties different than many of their urban and suburban peers? What is proposed?
184	5.) Include in the EIS all third-party studies related to the economic feasibility of the SunZia transmission proposal! Promotional hype by the applicant about cost-effectiveness and marketability can be very misleading to the public, investors, and regulators. It is not uncommon for a speculative project to fail after adverse environmental impacts have already occurred. Disclosure of actual third-party economic feasibility studies for long-distance tie-lines that purport to transport over 90% renewable energy must be included in the main body of the EIS before the next Record of Decision is considered. These highly relevant studies were buried in the public comment appendix of the last SunZia EIS, like many other bits of information, where they could conveniently be ignored by decision-makers and made difficult to find for the public.
184	6.) Include in the EIS the stated power purchase interest of all utility partners involved in the SunZia project, disclosing both the amount and source of electrical energy desired to be transported by SunZia and their backers and partners.

### Environmental Justice Comments

Submission Number	Comment Text
7	The social justice issue of putting the lines through small, rural communities who lack the resources and political clout to oppose the line.
12	The small, rural communities do not have the resources and political clout to oppose the line.
17	The social justice issue of putting the lines through small, rural communities who lack the resources and political clout to oppose the line.
44	The EIS also must fully explore environmental justice issues, including how building this line will invite the construction of other lines in the same area, turning this rural area into an energy transmission corridor to benefit out-of-state interests at the expense of low-income local communities.
80	SunZia's choice of the small, rural community of the Middle Rio Grande Valley is a social justice issue in my mind. We lack the resources and clout to oppose the project.
86	Don't know why BLM, you and the SunZia Southwest Transmission Project would want to come through private property and take away our residences, when there are several other routes you could take not on private land, and not taking peoples homes away. Lots of the other property owners at Santa Rita Ranches have retired out there, or are about to retire out there. It will be really hard to even try to find a place as great and beautiful as Santa Rita Ranches is. Just doesn't exist. Why are you singling out older poor people and taking their homes away for this project? Or even trying to force us to live around this hazardous situation which is very very dangerous and will compromise our health and our lives!!!
92	This includes investigating where the materials for the project are being sourced from and whether they are mined by unethical means.
98	Environmental Justice: This is an issue of environmental justice. Putting the lines through small, rural communities who lack the resources and political clout to oppose the line is considered the path of least resistance by large corporations and politicians that support them.

Submission Number	Comment Text
135	Weighing so many concerns, NM IPL would like to see that due diligence is done for the rural and vulnerable communities that may be affected most by this project. We ask that in hiring people to work on this project, if it is approved, that special preference be given to New Mexicans with attention to racially diverse and local hiring for any employment in construction and for the ongoing jobs from the project. We suggest that New Mexican companies and banks be used for the project, again as an environmental and racial justice request. Too often our state is seen as a sacrifice zone to be taken advantage of for the gain of other populations and companies, especially those who benefit outside of our state. We see these various concerns as justice and ethical considerations.
153	Environmental Justice As with many things, the fight for environmental justice is stymied by lack of access. In the region of the SunZia development, there are many New Mexicans and Arizonans whose voices will be left out of these public discussions and comment submissions due to obstacles like lack of access to computers or internet, lack of time or financial resources to devote to research and meetings, lack of legal advocacy, and more. Not only is it already difficult to ensure equal access to the decision-making process in situations like this proposal, but also, SunZia is doing no member of the public any favors in being forthcoming or helpful throughout the process. Personally, my family found out about this project two months ago. Luckily, we were able to scour websites, make calls, write e-mails, attend Zoom meetings, and spend time and energy on scrambling to fill in the unending blanks and gaps in information that arose in dealings with SunZia and the BLM with respect to the project. The latter's values are to serve with honesty, integrity, accountability, respect, courage, and commitment, which then quizzically elicits the question of why it is so disparagingly difficult to get straight answers from either group about the particulars of the project and our many concerns.
158	Recommendation 8: The BLM should study whether or not in the interests of fairness and social justice if approving these transmission lines is a fair treatment of all people in the counties, specifically in Socorro County, or is SunZia using this route because they believe that they would obtain less resistance than in some of the more affluent counties in NM, especially given that the power is not destined for NM, but markets in California. Please consider the environmental justice impacts on a larger scale. There is a growing and disturbing trend of cities outsourcing their power generation and transmission to rural areas. The federal government needs to facilitate healthy growth with minimal impacts to the human environment
169	The Bureau of Land Management is selling out our small, rural communities first in Escondida and now Belen that don't have resources or time or political influence to oppose them. How does the destruction of our property values and indeed our communities compare with short-term construction jobs for out-of-state linemen?
178	Small rural New Mexico communities are forced to bare the brunt of the impacts of these above ground transmission lines because they lack the resources and political clout to fight the utility companies that are profiting from sales of energy to Arizona and California.
184	Environmental Justice As with many things, the fight for environmental justice is stymied by lack of access. In the region of the SunZia development, there are many New Mexicans and Arizonans whose voices will be left out of these public discussions and comment submissions due to obstacles like lack of access to computers or internet, lack of time or financial resources to devote to research and meetings, lack of legal advocacy, and more. Not only is it already difficult to ensure equal access to the decision-making process in situations like this proposal, but also, SunZia is doing no member of the public any favors in being forthcoming or helpful throughout the process. Personally, my family found out about this project two months ago. Luckily, we were able to scour websites, make calls, write e-mails, attend Zoom meetings, and spend time and energy on scrambling to fill in the unending blanks and gaps in information that arose in dealings with SunZia and the BLM with respect to the project. The latter's values are to serve with honesty, integrity, accountability, respect, courage, and commitment, which then quizzically elicits the question of why it is so disparagingly difficult to get straight answers from either group about the particulars of the project and our many concerns.
184	If that is not possible, minimize the impacts on vulnerable communities and ecosystems across New Mexico and Arizona by returning to one of the previously approved and authorized route(s) through the White Sands Missile Range (WSMR) or the two alternate paths through the Sevilleta National Wildlife Refuge, which use existing rights-of-way and therefore would make less of an impact along undeveloped routes and pristine properties across New Mexico and Arizona.

## Travel and Transportation Comments

Submission Number	Comment Text
14	6.The old and condemned wooden bridge at Scholle Rd. over the arroyo just south of Rt. 60 is already impacted by Western Spirit. How will SunZia handle the condemned bridge? This is the main road into this area for many residents. The bridge is in great disrepair and could benefit from at least a resurfacing and a guard rail. Is this a repair that SunZia could consider?
14	7.Scholle Rd. (Socorro County Road 125) is mandated by Socorro County for Light Traffic Only. The sign put up by Western Spirit (EC Subcontractor Folks) may address the requirement of the lighter weight limit imposed by Socorro County due to the disrepair of the road; however, the amount of pick-up truck and service truck traffic is very heavy under Western Spirits (EC) workforce. The road has deteriorated considerably with the increased truck traffic. Will this traffic increase with SunZia and if so, how will SunZia provide better access to this 1 lane county road? I'm asking for safety reasons, ours, our neighbors, and all the cows and wildlife that graze along this road. Note: The service road provided and built by Western Spirit (EC) does not satisfy all their access needs. They still use the County Road all day long.
14	9.Much of this proposed line is in or borders a military operating area flight zone. How is SunZia working with the military to address this? Just today a jet fight buzzed our ranch at 500 feet or less. Fighters, C-130s and helicopters are regulars here.
30	The Department of Defense already copes with many obstacles in their airspace; a powerline can be accommodated by them.
48	Experiencing the terrain and road system of the Santa Rita Ranches area makes transportation difficult and especially when there is rain which can turn the road surfaces to grease due to the geologic makeup of the dirt in the area. To my knowledge there are two ways to reach Santa Rita Ranches. One way is from Magdalena over a sandy gravel road which can be difficult to traverse because of the sand and dunes on the sides of the road. The other entrance is off I-25 in Bernardo where you have to cross the Rio Puerco via an historic truss bridge then travel BLM roads and then do a bridgeless recrossing of the Rio Puerco closer to the Santa Rita Ranch entrance. I don't mind the rough travel because it allows Santa Rita to keep its natural habitat. The rough terrain allows nature to take its course, a place where wildlife can make a home away from the stresses of man. Santa Rita is a place of tranquility where you can be at peace with the world and enjoy a beautiful New Mexico sunrise or sunset or watch elk grazing or go on a geology hike. To interrupt this setting with man-made atrocities such as high-voltage lines is unconscionable.
48	There appears to be an established route along Interstate I-25 which would have more accessibility to established infrastructure, such as, utility/tower maintenance, hazard control, and catastrophic response.
105	1) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories. Lighting can have profound ecological impacts in a riparian zone.
138	Every new access road, first used by very heavy equipment, would later invite motorized trespassers and require constant maintenance to prevent erosion and invasive plants. Gates have no meaning.
140	I would like to see considered for Component 3--Segment 4 reroute: 1) The effect of increased route length (materials required for construction of the line, amount of new roads required, etc.)
141	We also note that the amendments proposed in the Notice of Intent include a large amount of road construction, both permanent maintenance access roads and temporary construction access roads. The construction and maintenance of these roads were not analyzed in the 2013 EIS, of course, because the line was going to be constructed along a different path. The impact of road construction and maintenance must be fully addressed through the lens of landscape and wildlife corridor fragmentation, ground and surface water interaction, and full cultural artifact surveys. This project also demands historic surveys of the area to determine the presence of and protect cultural and historic artifacts, particularly due to the proximity of the Camino Real and Jornada del Muerto.
142	1. At the northernmost portion of Socorro County Road A-125 is a one-lane bridge that crosses Abo Arroyo. I understand that this bridge has been condemned by the New Mexico Department of Transportation. While it remains open to local residents, it is not safe for commercial vehicles or other heavy equipment. The bridge has deteriorated further in recent months with traffic from light-duty trucks working on the Western Spirit 345 kV Transmission Project. I am including a current picture of the bridge with these comments; note the absence of guardrails.

Submission Number	Comment Text
142	2. Socorro County Road A-125 is a one-and-a-half lane dirt road that winds through a rugged canyon and across many arroyos. It is the most direct access to Highway 60 for the residents living south of the proposed Segment 4 Reroute, and it is our only access to Highway 60 when weather/mud renders the other access road, B-127, impassable. In essence, it is our lifeline, and it cannot be jeopardized by increased usage from transmission line construction and maintenance activities.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
151	A significant portion of the proposed SunZia project is the designation and analysis of alternative routes to move the previously pre-approved route out of the White Sands Missile Range (WSMR) Northern Callup Area. This action is critical to national defense due to WSMRs unique capabilities for testing and validating new and emerging military technologies. These unique capabilities cannot be duplicated on any other land-based test and training range. While the pre-approved routing will allow operations to continue at the range, the testing scenarios will be more limited and constrained due to narrowly defined azimuths of approach to the impact areas. This will limit data collection and evaluation and potentially increase the number of failed tests due to the constrained environment. In addition, as military technology continues to evolve, the additional constraints from the transmission line may prevent the ability to test and evaluate the newest systems.
151	In addition to moving the transmission line out of the Northern Callup Area, it is also imperative that the proposed alternatives do not negatively impact the missions of the other military installations in New Mexico. I coordinated with each of the flying organizations to identify any segments of the proposed routing that would affect charted Special Use Airspace, or any other land designated for military training. The 27th Special Operations Wing at Cannon Air Force Base indicated the proposed siting of the transmission lines would encroach on a portion of IR-113 (from PT E through PT I), the impact would be negligible as there are taller structures (wind turbines, communication towers, etc.) already located throughout this same section of IR-113. The 58th Special Operations Wing at Kirtland Air Force Base indicated the Segment 4 Reroute Alternatives will negatively affect two of our recently acquired landing zones permitted to 58 SOW by BLM. These Helicopter Landing Zones, designated as HLZ C and HLZ D, are located about one Section of land North of the Sierra Ladrone Wilderness Area. The 49th Wing at Holloman Air Force Base had no identified concerns if the transmission line was properly plotted and charted on published aviation charts.
153	3.) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories.
159	2. Strategic National Defense efforts have escalated since August 13, 2018, when the President signed the National Defense Authorization Act (NOAA) of 2019, which makes the development of Hypersonic systems one of the nation's top priorities. a. The 2018 NOS addresses modernizing key capabilities: Hypersonic, Integrated Air and Missile Defense, and Advanced Autonomous Systems (including Unmanned Aerial Vehicles), all requiring long range testing in the next 3-6 years. b. Critical National Security capabilities encompassing the DoD and Army priorities in Air and Missile Defense, Long Range Precision Fires, Directed Energy, Hypersonic and Autonomous systems depend on the Land, Airspace and Frequency-space that comprise WSMR for performance testing, threat exploitation and training in a realistic battlespace at tactical ranges. c. Aerial transmission lines in the NCUA would impede our ability to provide realistic operational environments including very-low-altitude test-flight profiles for, missiles, drones and other unmanned vehicles and to adequately replicate the advancing threats of our adversaries.

Submission Number	Comment Text
159	WSMR has prepared Environmental Assessments (EAs) since the date of the Final SunZia EIS in 2016 that will be of interest to your project. These are related to the ongoing test and evaluation of long range weapon systems within the NCUA. a. Theater High Altitude Area Defense (THAAD) Initial Development Program, 1994. This established a Launch Complex in the NCUA. b. Supplemental Environmental Assessment for Lee Impact Area, New Mexico, 2016. This EA adds the testing and evaluation of extended range capability of Precision Fires or similar unitary missiles. c. Environmental Assessment for Advanced Gunfire, 2018. Established the need to develop and mature the science and technologies supporting hypervelocity projectiles and future naval electromagnetic Railgun weapon systems. This EA used a newly established impact area in the NCUA. d. Environmental Assessment for Extended Range Capabilities, 2018. This EA establishes temporary airspace corridors into the NCUA restricted airspace for use in long-range Launch Test Article Testing (LTAT). Low flying systems would use airspace corridors over portions of Valencia, Bernalillo, and Torrance Counties north of the WSMR NCUA. Additionally, potential ground disturbance associated with target intercept test operations over a temporary debris impact area (1,000 acres) in the NCUA. e. Environmental Assessment for Precision Fires Rocket and Missile Systems Flight Testing from Fort Wingate Launch Complex, 2020. Test activities include launching missiles from the Precision Fires Rocket and Missile Systems family of missiles from Fort Wingate Launch Complex to WSMR in order to test the extended range capability of the missile. f. Environmental Assessment for Solid Fueled Rocket Motor Launches from Fort Wingate Launch Complex, 2018. Launch long range targets out of Fort Wingate Launch Complex to WSMR in support of a layered defense system.
159	WSMR is a tri-service installation operated by the Army, under the responsibility of the Secretary of the Army, with Deputies representing the Navy and Air Force and all three having future emerging needs to test extended long range weapon systems. WSMR provides Holloman, Kirtland, and Cannon Air Force Bases (AFBs) air space and range operations for training, special air operations and other missions. The Department of the Air Force issued a ROD in March 2021 for the EIS to implement actions to achieve Special Use Airspace (SUA) optimization for Holloman AFB, which may be of interest for the project.
159	The Army, Navy and the Air Force have future emerging needs to test extended long range weapon systems. A Programmatic Environmental Impact Statement (PEIS) is in the early stages to develop long range overland flight corridors from locations within the Continental United States terminating at WSMR in support of future long range weapon system testing demand, including hypersonic testing. The proponent is the DoD Test Resource Management Center. The ROD for this PEIS is estimated FY 2024, enabling usage beginning in FY 2025. The point of contact is Mr. Gabriel Saldivar, Acting Director, Strategic Technical Initiatives, gabriel.saldivar.civ@mail.mil, (575) 678-2937 or Ms. Catherine L. Giblin, Environmental Engineer, Materiel Test Directorate, catherine.l.giblin.civ@mail.mil, (575) 678-3541
184	3.) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories.

## Visual Resources Comments

Submission Number	Comment Text
14	8. Will there be lights on the tops of the SunZia towers? If so, is there a way to change that, or in effect lower the height of the towers to eliminate lights?
70	Due to its proximity to San Manuel Airport and Oracle State Park Arizona, I am seriously concerned about the negative impacts to the park, which is a 4000-acre wildlife refuge and International Dark Sky Park. Oracle State Park is also a Center for Environmental Education.
70	Impact during transmission line construction and operations will harm wildlife, habitats, and the daytime visual appearance, and the natural night sky environment that attracts visitors to the park from around the world.
70	The required transmission tower nighttime lighting due to the nearby airport also will adversely impact operations of the astronomical observatory under development at the Park for public outreach and University of Arizona astronomical research.

Submission Number	Comment Text
81	What part of the existing economy in tourism will be replaced by the SunZia project? Why would tourists want to come to the Land of Enchantment to see double lines of 200-foot-tall towers for hundreds of miles through some of the most scenic areas of New Mexico?
83	his is to register my opposition to the SunZia project. It will absolutely destroy the night sky view that Oracle residents value. My own view will be especially obliterated by your aircraft lights, significantly diminishing the value of my property. I will be horrified if this ill conceived idea is realized.
90	We have an international dark skies designation in Oracle. That would really ruin it
91	the process of the power lines and the lighting requirements will be degradative to our quality of rural life here. We're also trying to build a dark Sky. Community,
95	Our property values will be impacted due to the close proximity to these power lines as well as the unsightliness of them not to mention the noise as there is ZERO ambient noise
95	power lines as well as the unsightliness of them
105	1) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories. Lighting can have profound ecological impacts in a riparian zone.
106	From a human perspective, building Sun Zia transmission lines across 520 miles, with 125-179 towers placed every 1,400, resulting in a minimum of 42-53 towers, either monopole or lattice, will introduce visual pollution, spoiling the view scape where the planned route crosses the refuge. If the new lines are co-located with existing El Paso or Tri-State transmission lines, new towers will be double the height of existing towers, vastly increasing the eyesore aspect of the installation.
106	Since visitors to Sevilleta come to view the unbroken panorama, for the pleasure of experiencing the broad vista of open space that defines the roughly quarter million acres of the refuge, transmission towers and a 400+ wide road through the refuge will radically alter that visual experience. Undergrounding the majority of the line on Sevilleta NWR would serve to reduce the impact on humans and animals. No information covering a trade-off analysis for this approach is offered in the Sun Zia documents, implying little or no consideration has been given for undergrounding the lines.
120	We have an International dark skies designation in Oracle that would really ruin it, these lights, especially the night lights for the airport.
121	the process of the power lines and the lighting requirement will be degrading to our quality of rural life here. We're also trying to build a Dark Sky.
134	8) Analyses of each alternative must consider the impacts on the community, such as loss of tourism revenue, impairment of visual aesthetics, and decrease in property values. An underground alternative must be fully analyzed as a means of mitigating these impacts.
140	Impacts I would like to see considered for Component 3--Segment 4 reroute: Possible disruptions to the aesthetics, livability, and community cohesion of existing small communities along the route due to effects of construction and operation of transmission lines.
143	It is certain that if this is not done a precedent will be established and soon our beautiful riverscape and bosque will become an ugly corridor of power lines and pipelines.
143	There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico.
143	I write urging you to require that the proposed SunZia power lines be placed underground to mitigate the impact to birds as they use the Rio Grande River as their flyway and to reduce interference with the Rio Grande Trail. It is certain that if this is not done a precedent will be established and soon our beautiful riverscape and bosque will become an ugly corridor of power lines and pipelines. There will be negative impacts on tourism, birding and a general degradation of the gorgeous wide spaces of New Mexico. Our wildlife corridor, the Rio Grande River and it's bosque are priceless treasures that we must protect. BURY THE LINES near the Ri
144	As part of the EIS, BLM must address all aspects of the project in light of the new information and changed circumstances in the area which include, but are not limited to: new Federal Aviation Administration lighting requirements on a portion of the towers and lines that would significantly increase adverse impacts to river ecosystems and to dark skies including at Oracle State Park (which has an International Dark Sky Park Designation) that were not anticipated in earlier environmental review.

Submission Number	Comment Text
145	Siting the easement on the Martins property will diminish the value of the lands, resources, and aesthetic value of the property and the nearby Santa Rita Ranches.
146	These Electric towers and wires would affect our views. They would be oppressive as well as unsafe. My husband created a satellite image program of what they would look like in our community. We can see how close they would be and how much of our views and land they would obstruct. The views would be devastating! Ugly and obnoxious. We think you should walk it and study what you'll disrupt.
147	In 2015, SunZia was willing to bury 5 miles of its proposed line to alleviate conflict with military aerial testing on White Sands Missile Range. The new 2021 plan doesn't traverse the Missile Range eliminating the need for this burial. We now strongly urge an alternative in the EIS include burying the line instead where it would cross the Rio Grande River. This single mitigation will protect birds, wildlife, the Bosque riparian forest and the visual, cultural, educational and recreational experience of users of the Rio Grande Trail.
150	The transmission line will have a negative visual impact, will cause the unnecessary deaths of many birds, decrease economic values along the river and discourage tourism in these very unique environments. To minimize the environmental and economic impact, the lines need to be buried.
153	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?
153	Visual Resources Have you ever seen a power line? How about high-voltage towers that stand ten or more stories tall? Yes? Then you have an inkling of the visual impact of what it will be like to have hundreds of miles of such lines interrupting the pristine wilderness of New Mexico and Arizona's topography and skies.
153	3.) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories.
158	It is the beauty of this pristine NM landscape and the quiet solitude that attracted most of the landowners to Riley/SRR. The visual resources of this area along the entire route would be damaged in perpetuity by the construction of these symbols of civilization, where today there is currently little
158	Light There are two concerns with respect to unwanted light pollution. Many of the community members are amateur stargazers. Some, like ourselves own telescopes. The night sky in Riley (Santa Rita) is a class two on the Bortle Dark Sky Scale. During a new moon or after the moon has set, the stars are extremely visible. Corona discharges from power lines when igniting surrounding atmospheric gases can give off visible light. This is not a good thing in dark sky areas. Additionally, depending on Federal Aviation Administration guidelines, it may be required that the towers be lighted. Again permanent lighting in such a dark location is detrimental to the character of the area.
158	Recommendation 18: The BLM should deny the request for Component 3 Alternate 1. The Riley (Santa Rita) town and Santa Rita Ranches community is a class 2 on the Bortle Dark Sky Scale. Any ambient light that would be created by these towers would be a form of light pollution that would degrade the visual resources of this area as a dark sky area. Additionally, the communities are also extremely quiet and the transmission lines could increase the ambient noise. This form of noise pollution can also have detrimental health effects. Additionally, transmission lines can emit EMI which can affect electronics in the form of noise. Notification should be provided to the National Radio Astronomy Observatory Very Large Array (NRAO VLA). Radiotelescopes like those at the VLA are susceptible to EMI. If the BLM continues to view this as an option, then the BLM should hire an outside consultant to review the SunZia design and ensure they are taking steps in their design to mitigate the effects of light, noise, and EMI and not rely on SunZia to perform the design engineering unchecked. SunZia has a conflict of interest. The BLM should engage an environmental engineering firm that has subject matter expertise in construction of transmission towers to address risks and shortcomings in the SunZia designs, evaluate those designs for mitigations to address the light, noise, and EMI, issues and other factors discovered, then offer corrective actions, which should be conditions of any grant of permission for this route. The comment regarding the study would also apply to other paths under consideration, present paths and future paths.



Submission Number	Comment Text
167	There is no master plan at the State of NM level for establishing ecologically sound guidelines for the proper transfer of power across sensitive zones in NM. The visual pollution of these lines is also of concern- they may transfer green power, but they are ugly. Their electromagnetic fields (EMFs), may affect bird life and the navigational ability of bees. Valencia and Socorro Counties appear to be the current targets for a spiderweb of transmission lines. Worse, each power line installation company seems to be pursuing its own route to cross the river before continuing south. This practice cuts up more of the landscape and pits landowners against each other. The fear of an eminent domain action lurks in the background for those who are not interested. Shouldn't the various private power companies and the State and Federal agencies concerned be able to plan one or two well designed and attractive corridors where more than one company's lines can parallel and cross a sensitive area such as the Rio Grande? We have been told that other states, such as California, have put lines underground for some distances at a reasonable cost. The power line company reps who have attended public meetings in Valencia and Socorro counties poo-poo this. But some extra cost may be worth it in terms of a better overall plan. What are some specific examples of technology and cost for underground placement in other states that BLM and other agencies can look at?
184	Lastly, the construction and operation of systems that transport mega amounts of electricity have easily discernable effects on environmental noise and light pollution. Untouched areas are quiet and dark by nature, environmental conditions that are critically necessary for certain ecosystems. The audible hum of huge electrical wires coupled with industrial equipment and buildings that will require bright light sources in a dark sky region can have profound and dire impacts on bat, bird, and insect populations, nocturnal mammals, and other native fauna and flora in dry and riparian zones. What measures will SunZia take to contain light and noise pollution for the incredible mileage of the project?
184	Visual Resources Have you ever seen a power line? How about high-voltage towers that stand ten or more stories tall? Yes? Then you have an inkling of the visual impact of what it will be like to have hundreds of miles of such lines interrupting the pristine wilderness of New Mexico and Arizona's topography and skies.
184	3.) Any changes in lighting requirements for SunZia's proposed towers and lines (in order to obtain Federal Aviation Administrative approvals) must be analyzed with regard to all applicable resource categories.

## OUT OF SCOPE COMMENTS

### Out of Scope Comments

Submission Number	Comment Text
6	On behalf of L. Topaz Enterprises, Inc., Dale A. Ganske, President and 100% stockholder; I highly support the Sun Zia Project on Line #1 and #2; where my corporation owns land. Moving to Renewable Energy and solidifying our grid system should be a top priority to our country. Sun Zia has been very thorough, professional and prompt in supplying documents to me. I believe the BLM should expedite their requests to construct these transmission lines.
8	For example their surveying company trespassed on my private property early in the scoping period. And lately they have entered my state trust lands without my knowledge. My neighbor stopped and asked the crew what they were doing 2 weeks ago, when only yesterday did we receive a certified letter that they might do so.
8	I am an affected land holder and my family has an affected grazing lease. The actions of this company are suspect and underhanded negotiations from SunZia representatives from the beginning of the project shows their lack of integrity on all levels. I sincerely hope their past performance and shady dealings will be seriously considered.
9	Now, ask the Bureau of Land Management to suspend a new NEPA process for the fatally awed SunZia Transmission proposal until the Department of Interior and conservation interests provide much-needed ecological context in an eort to develop a rational, coordinated plan for high-voltage transmission.

Submission Number	Comment Text
10	We feel to support the transmission line coming through part of our 1269-acre property because of the obvious need for new and future transmission infrastructure.
11	The proposal as I understand it appears ill conceived and contrary to enlightened land and water management principles as espoused by the BLM and Interior Dept.
12	Please reconsider the project that would impact the migratory thru-way for birds and other species through loss of habitat; studies show that millions of birds and bats ... are killed by the blades of the turbines that are in excess of speeds of 120 m.p.h.
12	People who live near wind farms are affected by the vibration of the blades and the mechanical sounds that are produced by the turbine itself.
12	Lastly, I ask you to consider the cost of maintaining the turbines as well as the disposal of the giant blades that need to be replaced. The blades are not recyclable.
15	Just within the last couple of months we found out that there was a proposed route of 500 KV transmission lines that might go through our subdivision. I find it very concerning and deceiving that we have owned this property for 16 yrs and are just now finding out about this route. We chose the area for it's beauty, remoteness, diversity of animals, and historical features. I would love to leave it to my children and grandchildren. We do not want to live near high powered transmission lines for health reasons and environmental reasons, not to mention the disturbance of the natural beauty of the landscape. You want "renewable" energy and our politicians have sold out our beautiful state to these companies without regard to the people they affect. We have paid for the land and have invested money into it planning our homestead. We cannot afford to retire in another area. This is our land and our home and hopefully the companies and BLM will take our concerns into consideration.
16	We all must do our part to care for our limited resources, from small farmers like us to entire industries like the renewable sector that must be built up. For this reason, we strongly encourage you to support this project without further delay.
18	I am in full support and strongly urge you to consider the following combination of routes: Segment 4Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona), which include my property.
19	I strongly urge you to deny this rerouting passage through our portion state that will potentially disrupt our annual crane migration, eco tourism and state tax revenue for New Mexico and will for sure destroy our current vistas.
20	I am writing to demonstrate our support for SunZia's Southwest Transmission Project.
25	I would like to give my support for the SunZia project to be located on our private as well as leased land from BLM. This project will be instrumental in delivering the progressing renewable energy. The route supported by Rainbow Ranch is segment 4- route 1, route 3, sub-route A-1&sub route B-2.
26	I am opposed to the SunZia transmission line going through rural New Mexico.
27	want to be on record as fully supporting the SunZia Project.
27	I also support the relocation of SunZia to completely avoid the military testing range.
27	I encourage BLM to choose to approve the proposed Segment 4 - Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona.
30	The new proposal to route the SunZia powerline through Sevilleta National Wildlife Refuge should be abandoned.
30	Building this powerline, even along the existing right-of-way will damage critical habitat that will not recover.
32	We strongly object to Component 3 Alternatives 2 and 3 that would route high voltage lines across the Sevilleta National Wildlife Refuge. Our telescope was specifically placed at Sevilleta to avoid high tension lines and because of the low population density.

Submission Number	Comment Text
34	<p>A RESOLUTION IN SUPPORT OF THE SUNZIA TRANSMISSION PROJECT RE-ROUTE OUTSIDE THE WHITE SANDS MISSILE RANGE NORTHERN CALL UP AREA AND PROPOSED AERIAL RIVER CROSSING OUTSIDE OF SOCORRO COUNTY WHEREAS, The Socorro County Commission met in a regular meeting on May 12, 2020 at 10:00 AM in the Socorro County Annex Building, 198 Neel Ave., Socorro, New Mexico 87801; and, WHEREAS, NMSA 1978, Section 4-37-1 (1995) provides that Counties have the power to, "provide for the safety, preserve the health, promote the prosperity and improve the morals, order, comfort and convenience of any county or its inhabitants"; and WHEREAS, NMSA, 1978, Section 4-38-18 (1976) provides that a Board of County Commissioners has the duty and authority "[t]o represent the county and have the care of the county property and the management of the interest of the county in all cases where no other provision is made by law"; and WHEREAS, the County of Socorro is located in central New Mexico, known for its southwestern cultural traditions, vast, stunning mountain and desert vistas, the natural beauty of the Rio Grande and its bosque which is a component of a major US migratory bird flyway and provides winter refuge for hundreds of thousands of birds; and WHEREAS, the County of Socorro derives economic benefit from the world-renowned USFWS Bosque del Apache National Wildlife Refuge, the USFWS Sevilleta National Wildlife Refuge, and the NMDGF Ladd-Gordon Waterfowl Complex; and WHEREAS, Socorro and vicinity are a NM hotspot for birding and New Mexico is the 5th most visited state by birders; and WHEREAS, the Board of County Commissioners, is committed to protecting the County's traditional land-based customs, and cultures; improving the quality of life in the County; protecting the County's precious vistas; and developing housing, education and a business-friendly environment that creates prosperity and a bright future for the County's youth; and WHEREAS, the County is committed to preserving and protecting the health, safety and welfare of its residents and property owners; its environment, ecosystems, air, scenic beauty and other natural resources; and its history, culture and archaeology; all for the benefit of the County and its citizens; and WHEREAS, the SunZia Transmission Project (hereinafter "SunZia") intends to develop two (2) high voltage electric transmission lines anticipated to be approximately 520-miles long spanning parts of New Mexico and Arizona in order to convey up to 4,500 megawatts of renewable energy from New Mexico and Arizona to homes, offices and communities in the Southwestern United States; and WHEREAS, the SunZia Transmission Project previously contemplated a route crossing the White Sands Missile Range (WSMR) Northern Call Up Area and an aerial crossing of the floodplain of the Rio Grande River near Escondida; and WHEREAS, this Board initially adopted Resolutions 2017-40 and 2018-62 opposing the SunZia Transmission Project in its proposed location and adopted Resolution 2019-55 further explaining its objections to the proposed aerial Rio Grande crossing south of Escondida bridge; and WHEREAS, the Department of Defense has indicated that relocating the SunZia Transmission Project outside of the WSMR Northern Call Up Area would be in the best interest of national security objectives, given the value of WSMR to the national defense; and WHEREAS, SunZia has applied to the federal Bureau of Land Management to amend the federal right of way for the Transmission Project to re-route the proposed transmission line outside (to the north of) the WSMR Northern Call Up Area, with one proposed alternative route crossing the Rio Grande north of Socorro County adjacent to another transmission line (Western Spirit) before continuing on to Pinal County, Arizona; and WHEREAS, in the interest of protecting national security, the County supports SunZia's efforts to re-route the Transmission Project outside the WSMR Northern Call Up Area; and WHEREAS, the County supports SunZia's efforts to move its proposed river crossing and further supports the alternative route that moves the aerial river crossing to a location north of Socorro County where it can be adjacent to the aerial Rio Grande River crossing of the proposed Western Spirit transmission line; and WHEREAS, due to SunZia's efforts to re-route its proposed Transmission Project outside of the WSMR Northern Call Up Area and its proposed relocation of its aerial crossing to the north of Socorro County, this Board rescinds its Resolutions Nos. 2019-55, 2018-62 and 2017-40. NOW THEREFORE BE IT RESOLVED that the County supports SunZia's efforts to re-route outside of the White Sands Missile Range Northern Call Up Area and supports the alternative route that moves the aerial river crossing to a location north of Socorro County where it can be adjacent to the aerial Rio Grande River crossing of the proposed Western Spirit transmission line; and BE IT FURTHER RESOLVED that Resolutions Nos. 2019-55, 2018-62, and 2017-40 are hereby rescinded. BE IT FURTHER RESOLVED that the County Manager is requested to expressly communicate this resolution at the time of its passage to the Governor of New Mexico, New Mexico's Congressional Delegation and the New Mexico State Director, Bureau of Land Management. ADOPTED, PASSED AND RESOLVED, this 12th day of May 2020.</p>
35	I am opposed to the proposed routing of the Sun Zia power line through the Sevilleta National Wildlife Refuge.
36	We support the Segment-4-Route 1, Route 3, Sub-route A-1 & Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in AZ).
36	We are in support of relocating SunZia to completely avoid the military testing area, and support rebuild transmission lines through the Sevilleta NWR.
36	Furthermore, new transmission structure is important as development of new lines to deliver renewable energy is needed.

Submission Number	Comment Text
37	We support the combination of the routes listed below for this project: Segment 4- Route 1, Route 3, Sub-Route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona). Infrastructure is very important. I fully support relocating SunZia to completely avoid the military testing area. The development of new transmission lines to deliver renewable energy is desperately needed. I support to parallel the new Western Spirit transmission line and am also in support of rebuilding the existing transmission lines through the Sevilleta NWR.
38	Please accept this letter as a show of support for SunZia Southwestern Transmission Project. I am an impacted landowner along the SunZia Transmission route.
38	As an impacted landowner, I support the selection of the following route combinations: in Segment 4 (Route 1, Route 3, Sub-Route A-1 and Sub-Route B-2) and in Segments 1-3 (the original Par Alignment). I am pleased to sell my property to SunZia in support of their efforts. I support the transition to clean renewable energy. I believe the new transmission infrastructure is important to stabilize and protect the electrical grid. I support SunZia's efforts to relocate the line(s) outside of the Northern Call Up Area to preserve needed military testing and training areas. I also appreciate SunZia's efforts to co-locate and/or parallel with existing transmission infrastructure, including the recently constructed Western Spirit Transmission Line. If you should have any questions or concerns, please feel free to contact me by email at markrealtl@gmail.com.
39	As an impacted land-owner, I understand that new transmission lines will improve the power infrastructure. I support SunZia's project.
40	We are Christopher and Elena Starbuck, and we own land in New Mexico. SunZia is trying to build transmission lines for a renewable source of electricity across New Mexico, and depending on the decisions you make, these transmission lines may cross our property. We hope they do. This country sorely needs new and/or improved infrastructure if we are not to crumble, and it needs better sources of energy than oil and gas. Projects like SunZia's are beneficial and necessary. SunZia's proposed routes would avoid interfering with the military test site, which is also important to us all. We also think its a good idea to parallel the new Western Spirit transmission line. Please approve the following combination of routes: Segment 4Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona).
41	As an impacted landowner, we support the selection of the following route combinations: in Segment 4 (Route 1, Route 3, Sub-Route A-1 and Sub-Route B-2) and in Segments 1-3 (the original Par Alignment). We would be pleased to host the SunZia Transmission line(s) on our property. We support the transition to clean renewable energy. We believe new transmission infrastructure is important to stabilize and protect the electrical grid. We support SunZia's efforts to relocate the line(s) outside of the Northern Call Up Area to preserve needed military testing and training areas. We also appreciate SunZia's efforts to co-locate and/or parallel with existing transmission infrastructure, including the recently constructed Western Spirit Transmission Line.
42	The Sun Zia Real Property Team has done an excellent job of explaining the project and the proposed alternative routes. As an impacted landowner, we support the selection of the following route combinations: in Segment 4 (Route 1, Route 3, Sub-Route A-1 and Sub-Route B-2) and in Segments 1-3 (the original Par Alignment). We would be pleased to host the SunZia Transmission line(s) on our property. We support the transition to clean renewable energy. We believe new transmission infrastructure is important to stabilize and protect the electrical grid. We support SunZia's efforts to relocate the line(s) outside of the Northern Call Up Area to preserve needed military testing and training areas. We also appreciate SunZia's efforts to co-locate and/or parallel with existing transmission infrastructure, including the recently constructed Western Spirit Transmission Line.
43	We reiterate our support for growing the renewable energy industry in New Mexico and we encourage the Bureau of Land Management to join us.
45	Years ago my husband and I decided we would retire in our beloved state of New Mexico but wanted to be amid the natural raw beauty rather than the more populated areas. After a long search we found our Eden at the Santa Rita Ranches surrounded by BLM land. We have made many plans since our property purchase. Now just a few years from retirement we are told there is the possibility of this way of life we chose being spoiled. We understand the need for renewable energy for a growing population but hope another route will be found.
47	On behalf of New Mexico's Rural Education Advancement Program (REAP), we write today to voice our enthusiastic support for SunZia's Southwest Transmission Project and the enormous economic, educational and environmental benefits it will bring to New Mexicans young and old. By virtue of our organizations mission, wed like to emphasize how important this project will be to advancing educational opportunities for our states youth, particularly as they relate to STEM (science, technology, engineering and math) programs and, ultimately, STEM-related careers.
49	The Estancia Valley Economic Development Association (EVEDA) fully supports SunZia's Southwest Transmission Project.

Submission Number	Comment Text
50	As a landowner to be impacted by the SunZia Southwest Transmission Project, I am writing to give my full support for the project.
50	The segments that specifically impact my property are the routes below: Segment 4 Route 1, Route 3, Sub-route A1 and Sub-route B-2 as well as the original Par Alignment Segments 1-3).
50	The creation of energy is not an end in itself (whether produced by renewable or non-renewable sources) but is only useful if that energy can be efficiently distributed to the population in need of that energy. While I may derive benefits from land ownership, it appears to me that the above- defined project being proposed by SunZia will have much greater positive impact to many more people than myself. To that I give my support.
51	I strongly believe the best and least impactful route (to we surface owners) is the following route combinations: in Segment 4 (Route 1, Route 3, Sub-Route A-1 and Sub-Route B-2). and in Segments 1-3 (the original Par Alignment).
52	I own some acreage out there and they'll be using for a couple of Transmission lines sons ear and they promised me very good payments from my land
52	I'm very seem to be very happy with what what's happening
53	I'm calling for you to deny the approval for the SunZia project.
54	I would like the project to be considered abandoned and the formal analysis of the latest environmental impact process.
55	I am calling because, I, this is an ill conceived project. SunZia is an ill conceived project and it will impact the copper quarter, the Oracle state Park, this whole region, and I'm asking that the BLM abandoned this project. For numerous reasons, but I would like it be known that my my comment is that this project SunZia be abandoned.
56	I would demand that the project abandonment occur.
56	I do not believe in the alternative lines that SunZia is proposing.
56	So I do wish to record my - that I wish to demand project abandonment be formally analyzed as a alternative.
57	I say please do not destroy our last remaining Desert River Ecosystems.
57	I request denial of SunZia 's permits by the Department of the interior
57	I demand project abandonment.
59	I would recommend abandoning this whole project.
59	The line is too long and it would damage the rivers that we care about. It should not be done.
61	I would like to urge SunZia to withdraw their project
61	As stewards of our land of Arizona, I think it's just too many miles, three miles, to abandon that pipeline that will endanger the last remaining waterways the Rio Grande and San Pedro.
62	I'm recommending that you drop SunZia's powerline and accept a better environmentally project that will not jeopardize the San Pedro River and that precious gem that we have.
63	SunZia's plan to build an electric corridor has unacceptable impacts on Arizona's last remaining desert ecosystem and it's essential that project abandonment is formally analyzed as an alternative to SunZia's latest environment impact process.
63	Thank you for getting us all a chance to make comments and it's really imperative that SunZia's plan does not go forward as it is.

Submission Number	Comment Text
64	I support the SunZia line one, route one, and SunZia line number two going across my property. Hope the line is approved and those positions. It will help delivering new energy which we need, support SunZia completing it to avoid any military testing area, support the parallel line to the Western spirit Transmission line and support the rebuilding existing Transmission line through the Sevilleta Reservoir, game reservoir, which adjoins my property as well.
65	We need to protect the San Pedro River Valley as much as possible. Please use common sense and come up with a different proposal that would eliminate any damage that could possibly happen there.
67	I am calling to demand that project abandonment be formally analyzed as an alternative in SunZia's latest environmental impact process.
68	my comment has to do with why one of the things, that is not apparently being considered is the most obvious and the most intelligent one, which is to scrap the concept of routing SunZia along the Rio Grande and San Pedro altogether.
68	In other words, the whole project is a lie, and I think that the thing to do is not talk about re-routing, it is to talk about scrapping the thing altogether.
68	As you, I am sure are aware, this project has nothing to do with wind power in New Mexico. There is no need to send wind power to California anyway, they are already creating quite enough of their own, and the idea is much more likely to get non-alternative sources of power from one part of Arizona through to California having nothing to do with wind energy.
70	I urge that project abandonment be formally investigated as the most responsible alternative in SunZia's latest environmental impact process.
70	The SunZia project as originally envisioned is not viable
71	I would like to urge the Bureau of Land Management to stop the SunZia powerline.
72	I would like a project abandonment of SunZia, because of the damage, the environmental damage that it will do.
73	SunZia, is it sounds like it's harmful to the environment. So I'm hoping that you will consider a project abandonment and don't go forward with this harmful plan.
74	I'm calling to ask you for a project abandonment to be formally analyzed as an alternative to the SunZia's latest environmental impact process.
74	Let's just not do it, please. I'm a voter.
75	I strongly urge you to consider the project abandonment as an alternative in the present consideration of the environmental impact of SunZia's transmission line proposal.
77	Archaeology Southwest foresees environmental impacts from the newly proposed SunZia R-o-W that are not only significant but are unacceptable and quite likely unnecessary.
77	The proposed new R-o-W would, in conjunction with other types and levels of industrial land alteration, threaten and corrupt the essential identity of the Southwest as a place defined by open and natural spaces and by the intricate and sophisticated cultural resource complexes that define cultural landscapes.
78	Our ranch is in the route planned for the Sun Zia Transmission Project, and we will be impacted by the construction and operation of this Project. We are very much in favor of this project and see it as an opportunity to help our operation financially and to support the development of the wind farm planned for our area. We don't believe the transmission line will hinder our operation at all and will facilitate the installation of wind turbines on our property and our neighbors as well. Given the need for renewable energy development in our country to meet the aggressive goals set by our leaders this project and many others must be implemented and we look forward to being involved.
78	According to the maps of this adjusted route that will cross our property, we support the combination of the following routes: Segment 4- Route I, Route 3, Sub-route A-1 and Sub-route B-2, along with original par alignment Segments 1-3.
78	We particularly support relocating to completely avoid the military testing area.

Submission Number	Comment Text
78	We give a hardy thumbs up to SunZia and the whole wind project for our area!
79	Santa Rita POA does not want the powerline on our properties. We will not sell right of way to our roads. SunZia has already purchased 2 lots and right-of-way across several other lots, a clear violation of our covenants. Their intended purpose is commercial development.
80	The SunZia Southwest Transmission project would irreparably degrade the Middle Rio Grande Valley.
81	Based on what we heard during the scoping meeting on June 23, 2021, the first and most basic question concerning the SunZia Transmission Project that should be addressed is "is this good for NM?". Based on what we know about the answers to the questions we and others raised during the scoping meeting, we sincerely believe that it is not, and the requested changes to the SunZia project should not be approved.
81	he proposed changes to the SunZia project should not be approved and everything possible should be done to completely stop the entire project.
82	I am writing ... to express our concerns over the negative impact that the proposed SunZia Transmission Project will have on the natural beauty and resources of the Santa Rita Ranches subdivision should the power lines be allowed a right of way through the subdivision. The proposed route crosses eight subdivision lots of the Santa Rita POA of which Patsy and I are members (Lot 14). When Patsy and I purchased our lot we did not see ourselves buying a piece of property but investing in a dream and a vision of having a place to retire away from the noise and chaos of city life. A place where we would teach our children and grand children to see and appreciate the rich cultural, biological and wildlife resources that are rapidly disappearing in the name of progress. On our visits to Santa Rita we take great joy in wandering the unspoiled wilderness searching for relics of the past and experiencing a quiet solitude in a land that has remained relatively unchanged for hundreds of years. We fear that the SunZia Project will end that dream for us and many others like us. Patsy and I urge those who will decide the powerline route to opt for one that will bypass our Santa Rita Ranches. "We do not want the powerline on our properties".
84	The SunZia project's advanced development has the ability to bring 4,500 megawatts of clean energy to the grid within the near future and advances New Mexico's goals as a net exporter of renewable power. NMRET A supports the SunZia Southwest Transmission Project application and urges timely preparation of the environmental impact statement and issuance of a record of decision that allows NMRETA and the SunZia Southwest Transmission Project team to construct this vital infrastructure for the benefit of the entire Western United States.
85	I also serve as the Personal Representative of the Estate of Nathan A. Twining, Deceased (Personal Representative), in a pending probate matter which is being adjudicated in the Valencia County District Court (Estate). The Estate is an "impacted landowner," along the SunZia Transmission route (Route). Our client supports Sun Zia's proposed transition to clean, renewable energy that the Project will cause to be created, according to Sun Zia. In addition, our client supports Sun Zia's efforts to provide a transmission infrastructure for the Project that should have the effect of both stabilizing and attempting to protect the Project's electrical grid. Further, our client supports and further approves of and appreciates Sun Zia's proposed efforts to relocate the grid lines outside of the "Northern Call Up Area," in hopes of preserving ongoing military testing and its existing training areas. Last, but surely not least, our client expresses its appreciation for Sun Zia's apparent efforts to co-locate and/or parallel, with now existing transmission infrastructure in the State of New Mexico, including, but not limited to that certain recently constructed Western Spirit Transmission Line (Western Spirit), which our client was also previously involved with, prior to its approval by the BLM, and Western Spirit's recent construction in Southern New Mexico. In summary, the Estate urges the BLM and yourself to work cooperatively with Sun Zia, and to grant to it, and its representatives all of the courtesies, assistance, respect and cooperation which you previously offered to Western Spirit, and to approve any and all of Sun Zia's efforts referred to herein, and/or in the EIS, and, based upon your judicious and knowledgeable judgment, approve the Project, as soon as possible.
85	As the (legally designated) Personal Representative for the Estate, the Estate is supporting the selection of route combinations in Sun Zia labeled Segment 4 of the Project (Route 1, Route 3, Sub-RouteA-1 and Sub-Route B-2, as well as in Segments 1-3, which was the original Par alignment.
86	I am writing on behalf of the upcoming SunZia Southwest Transmission Project, of which you are a part of and have to make a decision on in behalf of the Bureau of Land Management (BLM). I really hope you will decide against this project and consider all the damage it will do to our surrounding land and area. We are counting on you. You are our last hope! I hope that they aren't paying you off to sign off on this project. This whole project is a disaster and a huge liability to the State of New Mexico with no benefit to our state, people, or environment!!! We don't even get any of this power. All we get is fall out and damage from this ridiculous power project.
86	Ruining this development with this huge power project, would be a real crime to humanity and nature.

Submission Number	Comment Text
86	This renewable energy power project is going to do more damage to New Mexico and the environment than good!! And New Mexico won't even benefit from any of this. None of the power is going to New Mexico. There are no real jobs being offered, and the power is going to other States (Arizona and California). New Mexico doesn't even get any power from this project. This will ruin our beautiful state with absolutely no benefit to New Mexico at all, leaving nothing but grief in its path, with lots of fall out damage!!!! How can you in your own good conscious even think of signing off on a project like this!!
87	I really appreciate that Sun Zia has offered to purchase some of the acreage on my land that will be impacted by this project, and fully support their efforts to send renewable electric power to areas that need it most, using powerful and safe infrastructure, that will support and protect these transmission lines using the routes mentioned previously, especially across so many miles. This project will of course, help to improve the New Mexico economy which is vitally needed and important, while it also positively contributes much needed renewable energy reserves to other areas of the country that desperately need it! I also appreciate their consideration in relocating their transmission routes to avoid the military testing site as well as building their transmission line parallel to the new Western Spirt transmission line. I've recently heard about and fully support, SunZia's agreement to rebuild the existing transmission lines through the Sevilleta NWR.
88	SunZia's proposal should not be able to go through
89	I am against the SunZia project
90	I recommend this project abandonment by BLM. The impact of the communities with lighting, with impact on wildlife, and impact on where we live, is unacceptable. This project would disrupt many lives.
90	I would like to recommend this project and abandonment by BLM.
91	I want the SunZia project to be totally abandoned
92	we are writing to express our support
92	we ask that the SunZia project move forward on the condition that the greatest possible care will be taken of our communities and our land.
93	I do not support the proposed route for the SunZia transmission line through the San Pedro River Valley
94	I am writing to express support for the Bureau of Land Management's (BLM) continued, thorough, and timely review of the SunZia Southwest Transmission Project's right-of-way (ROW) amendment that was originally issued in 2016.
95	I, as well as many other owners in Santa Rita Ranches vehemently oppose this route and the disruption and destruction of our residential area
99	I am an impacted landowner expressing my support for the SunZia Project
100	I want to express my support for this project as well as support for the SunZia Line #1 and SunZia line #2 and both routes for these lines as they cross my property. These lines represent new transmission infrastructure which is important as well as being strategically located whereby they are safe and not readily accessible by the general public. These lines, which proposed will avoid any military testing areas and will allow access and support to rebuild lines through the Sevilleta NWR. This project will be a great asset to New Mexico, its citizens, farmers and with ranchers.
101	In closing i would just like you to reject these alternative routes just to save SunZia some money if SunZia wants this project to continue they should have to use to route already approved by BLM.
102	As land owners in the San Pedro River valley, we are directly affected by the proposed energy transmission project on several of our properties, and are writing to express our heart-felt concerns and our current disapproval of the proposal.
104	I support the SunZia Energy Transmission Project linking renewable energy in New Mexico and Arizona.



Submission Number	Comment Text
107	I am in full support of SunZia's needed EIS to analyze the environmental impacts associate with their applications. As you know, SunZia already has an existing and approved route from the BLM and needs to make these tiny changes to approved right of way and add a D/C converter station. The overall route is not changing and the impacts through the already existing route is not changing. Just by running this portion of this 3.7B project through Graham County, SunZia will be our second largest taxpayer bringing less impactful forms of needed renewable energy out of Arizona and New Mexico to the power grid.
110	HES supports the SunZia project as beneficial and necessary. It is a step in the right direction with respect to upgrading the country's critical infrastructure and transitioning to clean energy sources. The proposed routes appear to have been properly vetted and thoughtfully planned. SunZia's proposed routes avoid interfering with an existing military test site and is planned to be parallel to the new Western Spirit transmission line. HES supports BLM approval of the following combination of routes: Segment 4Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona).
112	We do not want the transmission lines in our subdivision nor do we want the degradation of our environment, roads, and the hazards to our health and safety from these transmission lines.
113	I am writing to express my support for the SunZia Transmission Line
114	We welcome the SunZia project and encourage BLM to approve its route especially.
116	I am writing to support the SunZia Southwest Transmission Project's Right-Of-Way (ROW) amendment that was originally issued in 2016...I am also pleased to learn that SunZia has identified alternative routes that parallel existing transmission corridors and are highly responsive to military and environmental issues. In my opinion, the alternative routes and modifications are another example of how SunZia has not taken any short cuts, but spends additional time and money on establishing the most environmentally responsible and efficient route through New Mexico and Arizona. I encourage a most expeditious and timely completion of BLM's public review period and want to thank you for your consideration.
117	This letter is written in support of the SunZia Southwest Transmission Project
118	SunZia's proposal should not be able to go through that is how I feel.
119	I am against the SunZia project it's going to run a power line down in San Pedro Valley. It's not a project that's needed and that certainly is not the place to run it. So I urge you to vote against it, or vote, or whatever you do but I want you to know this is the way I feel and there's a number of people and Oracle to feel the same way.
120	I recommend this project abandonment by BLM. The impact on the communities with lighting, with impact on wildlife, and impact on where we live is unacceptable. This project would disrupt many lives.
120	I would like to recommend this project and its abandonment by BLM.
121	I want the SunZia project to be totally abandoned.
121	I want the SunZia project to be totally abandoned.
122	oppose the SunZia power line project because it will destroy one of the last viable waterways in Arizona, the San Pedro River.
123	I would just like to comment that the SunZia transmission line plan, in addition to wrecking the San Pedro Valley, is intended to send electricity to California from New Mexico. This is a crazy use of Arizona and please take that into consideration when you consider whether this transmission line should be approved. Please disapprove it.
125	I urge the BLM to totally abandoned this project as soon as possible.
126	I would like to demand a project abandonment of the SunZia project as this would be disastrous for our avian population and remaining riparian zone.

Submission Number	Comment Text
127	I'm calling about the SunZia project and I would like to see that project abandoned.
128	I demand project abandonment with the current SunZia proposal
128	As a lover of riparian corridors and important avian flyways, this would be disastrous to environmental values.
129	Calling you back.
130	Please know that I'd like to be formally analyzed as an alternative. I am not happy with the SunZia project. I request denial of SunZia's punitive permits; request denial of their permit by the Department of the Interior.
132	We do not support the two southern proposed routes that lie between the Casa Colarada and Bernalillo units of the Ladd S. Gordon Waterfowl Complex and Important Bird Area (Subroutes 2A- 2, 3A-2, 2A-3, or 3A-3), or any other route east of the MRG other than those that collocate with Western Spirit. Although these former routes were apparently defined to present a range of alternatives, we see no conservation justification in retaining them.
134	We strongly support responsibly sited clean energy projects in New Mexico and Arizona and are dedicated to ensuring clean energy projects minimize adverse environmental impacts. We hope that our recommendations provided in this comment will help the BLM ensure the SunZia transmission project aligns with these goals.
138	The proposed route of SunZia Southwest Transmission Project is contrary to the purpose and integrity of renewable energy.
138	To create those conditions through and parallel to the two of the region's most biologically rich and major migration pathways would benefit only the financial investors-if anyone.
139	I am fundamentally opposed to the SunZia transmission line project. SunZia wants to build 520 miles of dual H-frame behemoth (135-200 ft tall) power structures through pristine, untouched New Mexico wilderness, essentially to prostitute unspoiled New Mexico and deliver the power to California.
140	I am concerned about this project and its impact on the integrity of ecosystems and human communities on its route.
140	The difficulty of finding an appropriate route for this project that doesn't negatively impact wildlife habitat, human communities, national defense activities, etc., points to a larger issue: Is developing long-distance transmissions of electrical power a good idea for our future? Producing power in a centralized place and transporting it over long distances means that the people using the power are not aware of the effects of generating it.
141	To be clear, New Mexico Wild simply cannot support an alternative that destroys wilderness qualities of a WSA or a citizen inventoried LWC.... We welcome the opportunity to discuss our concerns with BLM and cooperating agencies as the NEPA process continues, and request that this comment be included in the project record.
146	The cost to the environment through all of the damage that will be done is high. We recommend that you address as a factor how efficient the wind turbines would be in light of the many factors that can cause them to fail when they are most needed and address it in a cost benefit analysis. We recommend you study this.
146	Just because the Governor and Legislature want this, as you stated on our zoom meeting, doesn't mean we do. If you poll the people you would be banned from continuing. Why? Because we don't care about the deal made with politicians who want to further the so called Green Act. We don't care about a lousy tax break. We don't care about how much money you want to make. We don't care about Californians who can make their own energy. Those in the area who will receive the electricity power are over 2xs wealthier than the New Mexicans whose land and life as we know it, is being threatened.
148	The SunZia Project is fully supported by the Southeast Arizona Economic Development Group and all of our Members/sponsors. This project will help bring needed jobs and economic growth to Southeast Arizona. We support renewable energy projects. Arizona and New Mexico have some of the best resources for wind and solar locations. The SunZia transmission line will be able to transport the energy produced.

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149	I am an impacted landowner in Veguita, New Mexico who is currently working with Western Spirits Transmission Line Project on my property and also fully support the proposed parallel path of SunZia's Transmission Line on the same piece of property. Planning clean energy for future generations is visionary. SunZia's plan achieves economies of scale and less environmental impact by paralleling the Western Spirit path. And staying well clear of the White Sands Missile Range just makes sense.
149	The combination of Routes I am in support of are Segment 4Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segments 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona).
152	I do not support the SunZia Southwest Transmission Project.
153	If that is not possible, minimize the impacts on vulnerable communities and ecosystems across New Mexico and Arizona by returning to one of the previously approved and authorized route(s) through the White Sands Missile Range (WSMR) or the two alternate paths through the Sevilleta National Wildlife Refuge, which use existing rights-of-way and therefore would make less of an impact along undeveloped routes and pristine properties across New Mexico and Arizona.
153	If the BLMs mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations, there is no conscionable way the SunZia Southwest Transmission Project should proceed. Bluntly, it is unfathomable to me how it could have made it as far along as it has.
153	7.) Include in the EIS a third-party career-vetting analysis of each principal owner involved in the SunZia project, with particular attention to the success rate of all prior project proposals.
154	Graham County fully supports the SunZia Southwest Transmission Project and views it as a great opportunity and benefit to our community. Please consider our county's strong support of this clean energy project.
155	We have partnered with both Western Spirit and Sun Zia to allow transmission lines to cross our property. We believe the development of new transmission lines is vital for delivering energy to an ever increasing population; therefore, we support the Sun Zia project. We would appreciate it if you would choose the route located on our property. We feel it is important for Sun Zia to parallel the new Western Spirit transmission line, to relocate Sun Zia to completely avoid the military testing area and to rebuild the existing transmission lines thru the Sevilleta NWR.
155	We also request your support on the following combinations of routes: Segment 4 -- Route 1, Route 3, Sub-route A-1 and Sub-route B-2 and Original Par Alignment Segment 1-3 (New Mexico Tech to the Pinal Central Substation located in Arizona).
158	Recommendation 6: If the new request by SunZia is still viable in the view of the BLM, and they do not stop the project in its entirety, or use the approved route, Alternates 2 and 3 would be the lesser of two evils over Component 3 Alternate 1, inasmuch that there is already existing high tension lines in that space used by El Paso Electric and TriState Power, so the overall impact on the environment is lessened if SunZia were to share that route with the other power companies. It is important to recognize that the existing line represents an important type of shared energy corridor, a power corridor with multiple circuits supported on shared towers, which would minimize environmental impact.
158	Recommendation 9: The BLM should deny the request for Component 3 Alternate 1, the Route around Ladron that goes through the community of Santa Rita Ranches. This route is very damaging to the environment due to its extra length compared to other routes studied or under study.
158	Recommendation 10: The BLM should determine if this method of centralizing power and making people dependent on the utility for their power is more beneficial than a distributed energy model where energy is localized, which would not suffer line losses and be less damaging to the environment.
158	Social and economic conditions The environmental impact by this project is immense as stated in the Background paragraph. The acceptance of this project would benefit a private company at the expense of the environment and the public good. It is ill conceived to have the government supporting an arrangement between Pattern Energy on the generation end with SunZia on the transmission end degrading the environment and ecology of New Mexico all the while using land set-aside for the public good to be abused for corporate profits.
164	It goes without saying that to build such infrastructure as is being proposed, would be a large disturbance to people living in the general area, making the Sevilleta Proposal much more attractive to residents of SRR (and Magdalena, and Alamo).

Submission Number	Comment Text
164	I find it rather ironic that such a disruptive Proposal to route through SRR would provide none of the residents nor landowners any power at all, being that it is designed to provide electricity generated by solar and wind farms in New Mexico to Arizona and California. The governing bodies in New Mexico should be appalled by such a notion, and I'm sure if the general population were aware of this mismanagement of New Mexico's resources, quite an uproar would result. Sadly, it appears, deals are being made between politicians and a private corporation, and the general public is left in the dark(which smacks of corruption to some degree).
166	As a land owner in Santa Rita Rancher, I would like to voice my objections to the passage of the planned tower structures and high power electric lines of SunZia through our private property.
170	I don't think that you've given it enough time and I don't think it should be going where you're putting it.
170	I don't think it needs to take over our new Mexico viewscape and keep it out of the areas that aren't secure.
173	I am submitting this against the SunZia power line proposal. No do overs until you get it rammed through.
173	Line can now be run through easements through Valencia county. Already built across Rio Grande and Interstate. Straight to Arizona and not cross New Mexico desert and Indian ruins just for mines.
175	I am writing to express support for the Bureau of land Management's (BLM) continued, thorough, and timely review of the SunZia Southwest Transmission Project's right-of-way (ROW) amendment that was originally issued in 2016.
175	SunZia representatives have worked tirelessly to identify alternative routes that address military and environmental needs, parallel existing transmission lines, and be highly responsive to various stakeholder issues. They have spent numerous years working with local landowners, communities and governmental entities to establish the most environmentally responsible and efficient path to build this important project in New Mexico and Arizona. I encourage timely completion of BLM's public review period and want to thank you for your consideration and expeditious approval of the SunZia Project.
182	I am writing to support the SunZia Southwest Transmission Project's Right-Of-Way (ROW) amendment that was originally issued in 2016.
182	I am also pleased to learn that SunZia has identified alternative routes that parallel existing transmission corridors and are highly responsive to military and environmental issues. In my opinion, the alternative routes and modifications are another example of how SunZia has not taken any short cuts, but spends additional time and money on establishing the most environmentally responsible and efficient route through New Mexico and Arizona.
183	This letter is written in support of the SunZia Southwest Transmission Project
183	SunZia has worked to satisfy property owners needs and gain their support of the project. I understand the alternate routes should improve the right of way given in 2016 since the route now stays out of White Sands Missile Range Call Up Area and provides for an improved river crossing site. I commend SunZia for their efforts to compromise and work with stakeholders.
184	If the BLMs mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations, there is no conscionable way the SunZia Southwest Transmission Project should proceed. Bluntly, it is unfathomable to me how it could have made it as far along as it has. I hope, as the BLM representative said during the final public discussion panel a couple weeks ago, my voice and the others opposed to the project do matter and are taken into consideration when the ultimate decisions are made.
188	I'm requesting that you abandon the SunZia project.