



October 23, 2015

Mr. Thomas K. Chenal, Chairman
Assistant Attorney General
ARIZONA POWER PLANT AND
TRANSMISSION LINE SITING
COMMITTEE
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Arizona Corporation Commission
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Re: Docket No. L-00000YY-15-0318-00171, SunZia Transmission Line Siting

Dear Chairman Chenal and Members of the Committee:

Please accept these comments on behalf of members and supporters of Sierra Club, Center for Biological Diversity, Huachuca Audubon Society, and Coalition for Sonoran Desert Protection. All of these groups participated in the planning process and submitted public comments to the Bureau of Land Management. The names, addresses, and phone numbers of contact persons representing each of these groups are contained in Section 9 of this letter. We incorporate by reference the comments submitted to the Bureau of Land Management (BLM) on the Draft Environmental Impact Statement for the Proposed SunZia Transmission Project submitted by these respective groups.¹

According to ARS § 40-360.06, there are several relevant criteria to consider before issuing a Certificate of Environmental Compatibility (CEC). You must consider a number of factors relative to the proposed including, but not limited to, the following.

- Existing plans of the state, local government and private entities for other developments at or in the vicinity of the proposed site.

¹ For ease of reference, comments of protesting parties incorporated by reference are found in Appendix J of the SunZia Project FEIS / RMPA. Sierra Club—Grand Canyon Chapter comments are identified as Comment ID Number 1600 (p. J-159); Center for Biological Diversity comments are Comment ID Number 2221 (p. J-475); Tucson Audubon Society are Comment ID Number 1601 (J.-209); Cascabel Working Group submitted multiple comments identified by Comment No. 1604 (J-272), No. 2160 (J-390), No. 2161 (J-391), No. 2162 (J-402), No.2164 (J-406) and Comment No. 2392 (J-526). Defenders of Wildlife comments are Comment No. 2100 (J-356); Sky Island Alliance comments are identified as Comment No. 1912 (J-330) and Comment ID No. 2100 (J-356). Coalition for Sonoran Desert Protection comments are identified as Comment No. 1830 (J-324) and Comment No. 2100 (J-356).

- Fish, wildlife and plant life and associated forms of life upon which they are dependent.
- Existing scenic areas, historic sites and structures or archaeological sites at or in the vicinity of the proposed site.
- The total environment of the area.
- Any additional factors which require consideration under applicable federal and state laws pertaining to any such site.

The statute states, "The committee shall give special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species."

The Arizona Power Plant and Transmission Line Siting Committee (Committee) can deny, approve, or approve with conditions this CEC based on these factors. The Committee can determine that the harm far outweighs the need. The BLM looked at more than 500 miles of the proposed transmission line across Arizona and New Mexico and, in our opinion, the real and significant impacts to the San Pedro got lost in the mix. The Committee can and must consider those. The Committee can and should deny approval of this line siting.

The Proposed Route:

From the Willow-500 kV Substation, the route heads southwest and crosses the Sulphur Springs Valley 7 miles north of the Town of Willcox, and continues along a 345 kV transmission line corridor, generally parallel to and north of the I-10. The route crosses the San Pedro River approximately 11 miles north of Benson, turns northwest, and it continues at a distance ranging from 2 to 6 miles west of the San Pedro River through portions of Cochise and Pima counties. The route continues northwest along a pipeline corridor into Pinal County, turns west at a point 5 miles northwest of San Manuel, then proceeds westerly, north of Oracle and the Santa Catalina Mountains, and along portions of 115 and 500 kV transmission line corridors, north of the Tortolita Mountains. The route turns north from a point near the Tortolita Substation toward SR 79, and then west, north of the Picacho Mountains, to its termination at the Pinal Central Substation located 8 miles north of Eloy, in Pinal County.

A portion of the route cuts northward through the Lower San Pedro River Valley. The Lower San Pedro River Valley supports one of the last major free-flowing rivers in the desert Southwest and, as such, provides important habitat for many species. The San Pedro River Valley provides habitat for a great diversity of avifauna and is a hemispherically-important migratory flyway, providing a key migration corridor for neo-tropical birds. It is internationally recognized as a globally important birding area and an important tourist destination.

The Lower San Pedro River is an Important Bird Area of Global Significance as recognized by BirdLife International. The San Pedro River Valley provides habitat for a great diversity of birds, including nesting raptors such as gray hawk (*Asturina nitida*=*Buteo nitidus*), Mississippi kite (*Ictinia mississippiensis*), common black hawk (*Buteogallus anthracinus*), and zone-tailed hawk (*Buteo albonotatus*). Western yellow-billed cuckoos (*Coccyzus americanus occidentalis*), a federally-listed threatened species with critical habitat designation pending, including areas proposed along the

SunZia route, nest in numbers on the lower reaches of San Pedro River. The high importance of the lower San Pedro River for the recovery of the southwestern willow flycatcher (*Empidonax traillii extimus*) contributed to its designation as critical habitat for the species. The Lower San Pedro is important to State Species of Conservation Concern, including western yellow-billed cuckoo, belted kingfisher, red-naped sapsucker, southwestern willow flycatcher, tropical kingbird, thick-billed kingbird, western purple martin, gray hawk, common black hawk, zone-tailed hawk, and Mississippi kite.

This hemispherically-important migratory flyway provides a key migration corridor for neo-tropical birds. During spring migration the riparian zone of the San Pedro provides food and cover for birds and is one of the most important pathways in the region for passerines on their journey north. The Lower San Pedro River is a globally important destination for ecotourists.

The San Pedro River Valley also supports one of the greatest diversity of mammal species in North America, including mountain lion, black bear, coatimundi, javelina, fox, coyote, badger, four skunk species, mule and white-tail deer, ringtail, raccoon, bobcat, beaver, porcupine, black-tailed prairie dog and 24 species of bats, as well as many other lesser known mammal species.

During the last 20 years, the high quality, unfragmented riparian habitat of Lower San Pedro River Valley has resulted in many lands being acquired for biological mitigation purposes. Recently, the lower San Pedro River Valley has been proposed by the U.S. Fish and Wildlife Service (USFWS) for the establishment of a new National Wildlife Refuge and Collaborative Conservation Initiative. This is a proposal that involves "... interested landowners, land managing agencies, local communities, nonprofit organizations and the public who share a vision of a healthy river system contributing to people's livelihoods and a functioning, hydrologically healthy riparian corridor that supports a diverse and rich nature flora and fauna." The BLM preferred alternative (subroute 4C2c) would bisect the lower San Pedro River Valley and would negatively impact the lands and habitat values in this proposed new wildlife refuge.

1. Issues Related to the Need for the SunZia Project

When new transmission lines are proposed such as the SunZia Project, they must serve a true need and be appropriately located to prevent unnecessary and undue degradation to lands and to avoid or minimize harm to wildlife, wildlife habitat, wilderness values, and other important natural and cultural resources. The proposed SunZia Transmission Line is neither justified by demonstrated need nor located so as to sufficiently avoid or minimize negative impacts to sensitive wildlife habitats and resources. The numerous negative environmental impacts of the SunZia Project to areas of high conservation value outweigh the need and the purported benefits of the project. We therefore request that the Arizona Power Plant and Line Siting Committee deny approval of a Certificate of Environmental Compatibility for the SunZia Transmission Line.

The purpose of the SunZia Project has been repeatedly framed by the Applicant as meeting a need for increased capacity for the transmission of electricity generated from "renewable energy sources." When the Southwestern Power Group (SWPG), the principal investor in the SunZia

Project, originally proposed the project, they made clear that the purpose of the SWPG proposal was to provide needed transmission capacity for its own proposed 1,000 megawatt (MW) natural gas-fired power plant located in Bowie, Arizona. Although the original SWPG proposal mentioned providing transmission capacity for renewable energy, SWPG's personal reason for proposing the SunZia project was to permit transmission of power generated at the Bowie power plant westward to Phoenix and California. SunZia's Willow Substation, described throughout the planning process and included as an integral part of the proposed action, would be sited with the already-permitted Willow switchyard for the Bowie power plant, allowing nearly direct power exchanges between the power plant and SunZia.

In addition, the proposed route connects with existing substations in southwestern New Mexico and the SunZia Project, potentially supplying transmission capacity for several natural gas plants near these substations, thus enabling their future expansion. The preferred alternative route does not go through the Afton generation site and substation which is in the same location as BLM's Afton Solar Energy Zone, despite the fact that the proposed SunZia Transmission Project is in relatively close proximity (20-30 miles) to this area where future large-scale solar energy plants will be incentivized on BLM lands. This supports the view that the SunZia Project intends, as a major component of its design, to provide new transmission capacity for natural gas development, rather than focusing on renewable energy.

2. Issues Related to Environmental Impacts

a. Issues Related to Air Quality

We are concerned that there would be adverse air quality impacts associated with an increase in fossil fuel-generated electricity associated with the SunZia Project. The SunZia Project could encourage development of natural gas-fired power plants like the Bowie Generating Station, and the likely result will be increased nitrogen oxide emissions, toxic air emissions, and other pollutants. This would make it more difficult for Arizona to meet its obligations relative to the new ozone standard and could also affect Arizona's Clean Power Plan State Implementation Plan.

b. Water Resources

The San Pedro River is one of only two major rivers that flow north out of Mexico into the United States, and it is one of the last generally undammed rivers in the entire Southwest. The San Pedro River Valley is a globally Important Bird Area. The riparian forest and adjacent Sacaton grasslands provide critical stopover habitat for millions of migrating birds each year. The San Pedro River Valley contains one of the planet's most significant Fremont cottonwood/willow gallery forests. Because of the hemispheric significance and importance of these riparian areas, the upper San Pedro River watershed was designated as the first Riparian National Conservation Area in the United States in 1988.

The San Pedro River basin is home to more than 80 species of mammals, including jaguar, black bear, coatimundi, bats, and beaver. Fourteen species of fish, including imperiled native

species such as Gila chub, longfin dace, desert sucker, roundtail chub, Sonora sucker, and speckled dace, may be found here. The diverse habitats are also home to 41 species of reptiles and amphibians, including the Sonoran tiger salamander and lowland leopard frog. There are more than 100 species of breeding birds, including the imperiled and federally listed yellow-billed cuckoo, and, seasonally, more than 250 species of migratory birds moving through the San Pedro River Valley.

Impacts to surface water resources, including the San Pedro River and its tributaries, could result from the placement of structures and the construction of access roads and temporary work areas. Direct impacts to the San Pedro River and its tributaries include sedimentation from project-related disturbances, fugitive dust deposition, temporary and permanent fill associated with the construction of roads and access routes, removal of riparian vegetation, bank alteration, accidental contamination associated with spills of environmentally harmful material, damage to wetlands, and introduction of non-native species of plants and animals.

The construction of access roads would likely require crossing many intermittent and ephemeral stream channels in the lower San Pedro River Valley. These crossings could require the placement of temporary or permanent fill into stream channels, as well as structures that support the crossing and protect water resources (e.g., bridge pilings, culverts, wing walls, etc.). Temporary impacts would result from temporary crossings or fill used to cross intermittent or ephemeral tributaries with little to no stream flow or on temporary access roads.

Ephemeral and intermittent waters can be just as important as perennial waters and were not given proper consideration by the BLM or the applicant. These waters are often more important in the Southwest because of the relative absence of perennial waters. Eighty-one percent of streams in the arid and semi-arid Southwest are ephemeral and intermittent streams. They provide important functions and values:

“These streams provide landscape hydrologic connections; stream energy dissipation during high-water flows to reduce erosion and improve water quality; surface and subsurface water storage and exchange; ground-water recharge and discharge; sediment transport, storage, and deposition to aid in floodplain maintenance and development; nutrient storage and cycling; wildlife habitat and migration corridors; support for vegetation communities to help stabilize stream banks and provide wildlife services; and water supply and water-quality filtering.” Because of their significance, it is recommended that these streams not be looked at individually, but that “[c]onsideration of the cumulative impacts from anthropogenic uses on these streams is critical in watershed-based assessments and land management decisions to maintain overall watershed health and water quality.”

Modification of stream banks could result in the removal of vegetation that could take many years to recover. Sedimentation potential would increase, depending upon the extent of disturbance and the amount of re-contouring needed. Permanent impacts would result from stream channel crossings, into which structures would be placed in the streambed, potentially

causing an irreversible loss of riparian vegetation on either side of the crossing. The removal of unique riparian habitat, increased sedimentation, and reduced water quality are among the primary adverse environmental effects on surface water resources associated with the Sunzia Project.

Direct impacts to intermittent surface water features are similar to those for perennial waters, although intermittent streams typically have less associated riparian vegetation and, subsequently, are more prone to erosion. Indirect impacts include increased soil erosion due to removal of vegetation. The construction of access roads would likely require stream channel crossings. These crossings could require the placement of temporary or permanent fill into stream channels, as well as structures that support the crossing and protect water resources (e.g., bridge pilings, culverts, wing walls, etc.).

Temporary impacts would result from the construction of temporary crossings or the placement of fill used to cross intermittent or ephemeral tributaries with little to no stream flow or the construction of temporary access roads. These crossings would have the potential to impact stream morphology and ecological function. The modification of stream banks could result in removal of vegetation that could take many years to recover. Sedimentation potential would increase, depending upon the extent of disturbance and the amount of contouring needed. Storm water discharge and quantity of sedimentation to the San Pedro River and its tributaries are correlated to project-related disturbances. Permanent impacts would result from permanent stream channel crossings, into which structures are placed in the streambed, potentially causing an irreversible loss of riparian vegetation on either side of the crossing.

Transmission line access roads typically cross, or are close to, perennial and intermittent streams. It has been well-documented that construction of new access roads increases erosion and sedimentation of water resources. All construction activities within the lower San Pedro River watershed could result in increased sedimentation to the San Pedro River or its tributaries. Periodic vegetation removal or repair to access roads could have indirect effects because of soil erosion, further increasing sedimentation.

3. Issues Related to Biological Resources

The proposed route for SunZia includes unacceptable impacts to sensitive wildlife habitats and wild lands. We have consistently maintained that proposed transmission lines through the Lower San Pedro River Valley were unacceptable due to high levels of ecological sensitivity of these areas. The San Pedro River Valley is a globally significant area that is a well-documented migratory corridor for birds and other wildlife, and it contains designated critical habitat for several endangered species.

Substantial public and private conservation investments have been made in the Lower San Pedro River Valley. It is an area so special and ecologically valuable that it has recently been proposed by the U.S. Fish and Wildlife Service for the establishment of a new National Wildlife Refuge and Collaborative Conservation Initiative, an effort "involving interested

landowners, land managing agencies, local communities, nonprofit organizations, businesses and the public who share a vision of a healthy river system contributing to people's livelihoods and a functioning, hydrologically healthy riparian corridor that supports a diverse and rich nature flora and fauna" The route would run astride this new wildlife refuge. This is not an appropriate area through which to route a major new energy corridor.

Construction of a large transmission line involves developing temporary construction roads as well as a permanent road under the line. This causes significant habitat fragmentation and invites off-road vehicles. Roads and motorized uses can have serious detrimental effects on habitats and wildlife.^{2,3,4} These effects include direct, indirect, and cumulative impacts, ranging from mortality from collisions with vehicles, modification of animal behaviors, altered use of habitats, facilitation of the spread of exotic, invasive, and parasitic species, adverse genetic effects, and fragmentation of connected habitats.

Further road-building, construction, and improved off-road vehicle access in this area will also contribute to erosion and sedimentation that could travel downstream through tributaries and impact threatened native fish populations and other species^{5,6}

a. Specific Concerns about animal and plant species. (We have included some specific concerns about certain species, but it is not a comprehensive list.)

i. Wildlife

a) Mammals

American pronghorn (Antilocapra americana)

The management of pronghorn and their habitat represent an important conservation issue for North American grasslands, as pronghorn are an indicator of grassland ecosystem health and are valued as a wide-ranging, native game animal. Because pronghorn range widely to access the most succulent forage available at different locations and at various times of the year and often return to specific fawning grounds, they are a landscape-connectivity dependent species. This means that their life history requirements necessitate an ability to move freely between resource patches, which are often spread out across large landscapes.

² Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14: 18-30.

³ Wisdom, M.J., A.A. Ager, H.K. Preisler, N.J. Cimon, and B.K. Johnson. 2004. Effects of off-road recreation on mule deer and elk. *Transactions of the North American Wildlife and Natural Resources Conference* 69: 531-550.

⁴ van Riper, C. III., and R. Ockenfels. 1998. The influence of transportation corridors on the movement of pronghorn antelope over a fragmented landscape in northern Arizona. *Proceedings International Conference on Wildlife Ecology and Transportation (ICOWET)*.

⁵ Environmental Protection Agency. 1995. *Erosion, Sediment and Runoff Control for Roads and Highways*. EPA-840-F-95-008d.

⁶ Grace, J. M. III. 2002. *Sediment Movement from Forest Road Systems: Roads: a Major Contributor to Erosion and Stream Sedimentation*. The Free Library. Available online at <http://www.thefreelibrary.com/Sediment+movement+from+forest+road+systems%3A+Roads53A+a+major...-a095443346>.

Pronghorn have declined in Arizona over the past two decades. In 1987, the statewide population of pronghorn was estimated at nearly 12,000, but by the year 2000 the population estimate had declined to less than 8,000. Grassland habitats in Arizona and New Mexico continue to be subjected to extended drought, habitat conversion and fragmentation from urban and agricultural development, and woodland encroachment. Therefore, the conservation and restoration of remaining viable pronghorn summer and winter ranges, as well as seasonal migration corridors, is even more important if pronghorn populations are to recover. Pronghorn are especially sensitive to development and habitat fragmentation.

Bats

Because many bat species are highly specialized and can be difficult to locate within their roosts, it is critical that highly trained and qualified biologists conduct any bat surveys. Likewise, the surveys should be conducted at different times of the year and at various times during the night. Bats use different roost sites during different times of the night and in different seasons. Just because a roost is not occupied at the time of the preconstruction survey does not mean that it is not utilized or of importance.

Impacts to tree-roosting bat species, such as the western red bat (*Lasiurus blossevillei*) or western yellow bat (*Lasiurus xanthinus*), are of concern. Note that both of these species are special status and have a high likelihood of being present or are present (respectively) in the project area. Vegetation removal is a primary threat to these species. When roosting, these species can be very difficult to locate.

b) Birds

This project poses a significant threat to many avian species. Habitat loss, degradation, and fragmentation; direct mortality from construction, operation, increased recreation use, and collision with transmission line structures; disturbance resulting in altered behaviors, reduced nest success, etc.; reduced water quality due to erosion and sedimentation; and much more all have the potential for significant impacts to these species. Mitigation measures have the potential to reduce some of these impacts, but many avian species will still be negatively affected by this proposed action.

Raptors

Will disturbance of nesting raptors be limited by constructing outside of nesting season? If so, when would such construction occur to ensure that disturbance will be avoided? Also, many raptors use the same nest each year. Will existing nests be avoided? Further analysis is needed in order to adequately understand these impacts.

Snow geese (Chen caerulescens)

At various times of the year, the snow goose can be found in almost every state or province of North America. Migrating snow geese concentrate in large numbers at many sites along traditional flyways across the continent. Always near water, snow geese breed on open, coastal tundra dominated by grasses and sedges. During migration they use both fresh and

saltwater marshes, ponds, lakes, streams, meadows, and agricultural lands. Wintering snow geese inhabit a variety of marine and freshwater wetlands, including grassy marshes, wet fields, rice plantations, farm fields with waste grain, and open pastures.

This proposed line should have avoided migratory flyways and important habitats for this species in order to prevent collisions and population-level impacts. We recommend avoiding spanning bodies of water or placing lines between heavily-used bodies of water and landscape contexts in which the overhead static wire is obscured or hard to see.

c) Amphibians

Typically, it is assumed that amphibians will be affected in areas where perennial water occurs. However, as discussed in the section on special status species, intermittent and ephemeral waters can be very important to a variety of species, including various amphibians.

d) Reptiles

There is potential for construction related activity to cause direct mortality to reptiles, plus there are impacts related to fragmentation caused by road construction. Additional access created by the proposed lines could result in greater mortality to snakes as some people purposefully kill snakes.

e) Fish

Many fish species utilize ephemeral waters for dispersal, etc.

f) Invertebrates

Information regarding invertebrate species is, unfortunately, completely lacking, as was acknowledged in the FEIS. As noted above, without an understanding of what species occur in the project area, it is impossible to know the full extent of impacts caused by this project. Many invertebrate species are highly endemic and may only occur in relatively small areas. If such species occur within the project area, this project has the potential to disrupt the required habitat and have significant negative impacts on the species, including impacts at both the population or species level.

g) Special-status wildlife species

The project would affect special status species and traverse and potentially negatively affect habitat for the southwestern willow flycatcher.

The most prudent and cost effective way to achieve these objectives is close consultation with the USFWS and the Arizona Game and Fish Department (AZGFD), avoidance through

robust screening, monitoring, effective mitigation, and application of the precautionary principle.

The Final Environmental Impact Statement for the project stated that a "significant impact on biological resources could result if any of the following were to occur from construction or operation of the proposed action." [See SunZia Project FEIS / RMPA at 4-68] One of the impacts listed is "[f]ragmentation resulting from the addition of new infrastructure to large, currently intact blocks of habitat." As such, we anticipate that habitat fragmentation associated with the construction and/or improvement of roads, as well as disturbance from maintenance activities associated with SunZia and subsequent disturbance associated with increased public access, would have a significant impact on the following terrestrial special status wildlife species with relatively large, intact habitat blocks in the affected region: jaguar, ocelot, jaguarundi (if present), Mexican gray wolf, desert bighorn sheep, New Mexico meadow jumping mouse, Arizona striped whiptail, Sonoran desert tortoise, Tucson shovel-nosed snake, northern Mexican garter snake, northern aplomado falcon, cactus ferruginous pygmy owl, and Sprague's pipit, among others. Most, if not all, of these species have been documented to be sensitive to habitat fragmentation and human disturbance.

Should the project move forward to construction, the project proponent must consult with the USFWS and Arizona Game and Fish to determine site-specific and/or off-site mitigation measures to avoid, minimize, and offset impacts from fragmentation and disturbance to these species. A crucial mitigation measure that should have been included and implemented globally is to tightly restrict vehicular access to transmission line access roads, so as to avoid an increase in human-related impacts that are facilitated by access, such as direct mortality from vehicle collisions and poaching and disturbances that affect habitat quality such as noise, pollution, accelerated erosion, and the accidental introduction and spread of non-native species. Additional information about some of these species follows.

Chiricahua leopard frog (Lithobates chiricahuensis)

Ephemeral and intermittent drainages can be of great importance to this species. With regards to this species, with reference to both perennial and ephemeral waters, the USFWS states that, "for Chiricahua leopard frogs, defining the action area of a proposed project must consider the reasonable dispersal capabilities of the species, and the likelihood/extent of any downstream or upstream effects that might arise from the proposed action."

Other amphibian species are likely to be similarly affected.

Lesser long-nosed bat (Leptonycteris curasoae yerbabuena)

The lesser long-nosed bat is listed as endangered under the Endangered Species Act. Because it migrates long distances and is one of the nectar-feeding bat species, it must time its travel to coincide with the flowering or fruiting activity of its food plants. The floral resources they depend upon have been threatened by wildland habitat conversion and fragmentation, and maternity roost sites (located in caves and abandoned mines) are sensitive to human disturbance. The proposed SunZia Transmission Line is located at the

northern limits of the range of the lesser long-nosed bat. However, there is also a significant possibility that additional, undocumented roosts could exist within the study area, as it contains concentrations of agaves that could be used as food sources by this species. The lesser long-nosed bat is known to be capable of traveling long distances, in the range of 30 to 60 miles, in a single night to forage. The proximity of the study corridor to other known roosts makes it likely that these populations forage within the study corridor occasionally.

Lesser long-nosed bats are likely to use different roosts in different years to be closer to better foraging areas. If an important roost site is disrupted or destroyed as part of this project, it could have significant impacts on this species.

Agave and saguaro that would need to be removed should be transplanted near the removal site, and additional plants should be planted for mitigation (and to account for possible unsuccessful transplants) at a minimum of a 3:1 ratio.

Mexican long-nosed bat (Leptonycteris nivalis)

Thorough surveys must be done for species such as this.

Mexican gray wolf (Canis lupus baileyi)

The Mexican gray wolf does not currently occur in the project area, but this area does include suitable and historic habitat for this critically endangered species and USFWS revised the rule to allow wolf dispersal in this area. The Mexican gray wolf is a subspecies of the gray wolf, and is the most endangered type of wolf in the world. After being extirpated in the United States and with only a few animals remaining in Mexico, Mexican wolves were bred in captivity and reintroduced to the wild in Arizona beginning in 1998. The goal of the reintroduction program, which is only a first step toward full recovery, was to restore at least 100 wolves to the wild by 2006, but that did not occur and is certainly not the number that scientists recommend. At the end of 2014, there were still only about 110 wolves in the wild in Arizona and New Mexico. This species remains critically endangered.

A wolf reintroduction effort is also underway in Sonora, Mexico. If a strong population of wolves is established there, it is quite likely they would range northward, including into areas affected by the proposed project. Much of the proposed corridor borders the southern boundary of the 10j reintroduction area for the species and so may particularly affect dispersal and genetic exchange between populations now being established in Mexico and those in the US. The entire SunZia planning area is within the Sky Islands region, which could be identified as a key recovery area in the revised recovery plan that is now underway. North/south habitat linkages for this species are particularly important to protect. New access roads associated with SunZia could provide new access into wolf habitat. The level of vehicular access is directly related to the relative level of habitat security for this species as these wolves are particularly at risk to illegal killings.

Even with the current low numbers in the wild, Mexican gray wolves have ranged across various portions of the proposed SunZia project planning area in search of new territory. Such occurrences will likely occur more often as the population grows and disperses. The Five-Year Review of the Mexican gray wolf recovery program found that movement distances for lone wolves averaged 87 ± 10 km (54 ± 6 mi). In addition, introduced Mexican wolves in northern Sonora, Mexico, could also range into the SunZia project planning area.

Jaguar (Panthera onca)

The United States portion of the jaguar's range coincides with the proposed transmission route in Cochise and Pima counties, making it essential that SunZia planning limit habitat fragmentation and preserve movement corridors for this species. Areas with moderate to high quality jaguar habitat should be given particular consideration, including the area in and surrounding Steins Pass at the Arizona/New Mexico border, the area within approximately 25 miles east of Willcox, Arizona, and between Tucson, Arizona, in the west and State Highway 191 in the east. North/south habitat linkages for this species are particularly important to protect, and tend to coincide with areas with riparian corridors, lands with moderate to high vegetation cover, and rough terrain.

Ocelot (Leopardus pardalis)

Ocelots have been positively identified in Arizona and may travel through the study corridor. A new recovery plan is being developed by the USFWS for this species. According to the draft recovery plan for the ocelot:

[the species] is listed as endangered throughout its range in the western hemisphere where it is distributed from southern Texas through Central and South America into northern Argentina and Uruguay. No critical habitat has been designated for the ocelot. Currently the U.S. population has fewer than 100 ocelots, found in 2 separated populations in southern Texas, at the northern limit of the species' distribution. A third and much larger population of the Texas ocelot occurs in Tamaulipas, Mexico, but is geographically isolated from ocelots in Texas. The Sonoran ocelot was last documented in southern Arizona in 1964, and presently occurs in northwestern Mexico but little is known about its abundance and distribution.

Until more field research is conducted to study and determine ocelot habitat selection in this northern portion of its range, all vegetation types with dense cover and an adequate prey base should be considered potential ocelot habitat.

The Committee must also consider that changing habitat – due to drought, climate change, and other factors – will shift the range and movement patterns for a variety of species, including the ocelot. The fact that five ocelot have been identified in Arizona in the last four years may indicate that such incidences may be increasing.

Golden eagle (Aquila chrysaetos)

This wide-ranging and broadly-distributed species, protected by the Bald and Golden Eagle Protection Act (BGEPA), is likely to be impacted by transmission development to some degree, but because knowledge of their distribution and habitat use is so vague, the impacts of potential development in any particular area cannot be quantified with any accuracy and precision. This does not mean that population-level impacts do not need to be examined, but it does make filling information gaps for this species crucial, both at the local scale through sufficient study of the proposed project area as well as the landscape scale through population level surveys and monitoring.

The Applicant should consult with USFWS regarding what surveys should be conducted to predict potential eagle mortality and, if warranted, consider applying for an eagle incidental take permit. Although fatalities most often occur at smaller (≤ 69 kV) distribution lines, electrocution and collision are known causes of mortality for the golden eagle. The design and layout of SunZia's towers, transmission lines and guy wires should minimize risk to eagles. We recommend SunZia develop an Avian Protection Plan (APP) and follow best practices laid out by USFWS and the Avian Power Line Interaction Committee (APLIC).

Bald eagle (Haliaeetus leucocephalus)

Much of the information regarding the golden eagle provided above also applies to the bald eagle. While it is true that bald eagles are most often found in areas with open water, they can be seen in areas without these permanent sources, especially during non-nesting or migration periods. In fact, some bald eagles spend a significant amount of time in areas far from water.

Yuma clapper rail (Rallus longirostris yumanensis)

While Yuma clapper rails infrequently use the project area, infrequent use does not automatically signify that impacts will be low. Picacho Reservoir and similar areas may become increasingly important as habitat changes occur in other areas of this species' range. Such impacts must be recognized and analyzed.

Cactus ferruginous pygmy-owl (Glaucidium brasilianum cactorum)

The cactus ferruginous pygmy-owl was listed as endangered under the ESA in 1997, but was delisted in 2006 "for reasons unrelated to recovery." In 2011, the USFWS determined that listing was not warranted, but clearly the species is in imperiled and as such is listed as sensitive by the BLM. Habitat for the cactus ferruginous pygmy-owl is located throughout the project corridor area.

Threats to pygmy-owls include loss habitat including that in riparian areas and the spread of invasive species such as buffelgrass that cause unnaturally hot fires to burn, destroying saguaros and other native vegetation.

Pygmy-owls are currently found primarily in Sonoran desert scrub vegetation and riparian drainages and woodlands, as well as palo-verde-cacti-mixed scrub associations. It primarily nests in saguaro cacti cavities, so additional loss of saguaros associated with this project could negatively impact this imperiled species. To improve habitat for this species, it is important to both maintain and restore "woodland vegetation along drainages and tall upland vegetation with saguaros." The BLM should avoid, salvage, and relocate saguaros of transplantable size is important to reduce impacts to pygmy owl habitat. Any activities should also avoid mesquite bosque habitat.

Because pygmy-owls generally fly short distances a minimal distance above the ground when they seek to cross vegetation openings during natal dispersal and when flying across their home ranges, so consideration should be given to this and creating much wider opening devoid of perching areas should be avoided.

Sandhill crane (Grus canadensis)

Sandhill cranes are primarily birds of open freshwater wetlands, but the different subspecies utilize habitats that range from bogs, sedge meadows, and fens to open grasslands, pine savannas, and cultivated lands. Sandhill cranes occur at their highest breeding density in habitats that contain open sedge meadows in wetlands that are adjacent to short vegetation in uplands. A portion of three distinct populations of sandhill cranes winters in Arizona. Cranes from both the Rocky Mountain (RM) and mid-Continent (M-C) populations winter in the Sulphur Springs and Gila River valleys of southeastern Arizona.

Areas of concern for sandhill cranes in the project area include the Willcox Playa in southeastern Arizona, which supports the second largest over-wintering concentration of this migratory bird.

The USFWS estimates that 174 million birds die each year as a result of colliding with transmission lines. The project should have avoided spanning bodies of water or placing lines between heavily-used bodies of water and landscape contexts in which the overhead static wire is obscured or hard to see.

Southwestern willow flycatcher (Empidonax traillii extimus)

The endangered southwestern willow flycatcher is found at various locations in the project area, with designated critical habitat along numerous riparian corridors (the species' breeding habitat) in the region. They are threatened by habitat loss, particularly in these riparian areas.

Avoidance, minimization, and mitigation measures consistent with the recovery plan (and implemented in consultation with USFWS) may be warranted for any instances in which the transmission corridor crosses a floodplain or other riparian habitat area. Engineering of structures to span over flycatcher habitat is the preferred avoidance method, and vegetation

preservation and/or restoration actions should be implemented where SunZia interacts with flycatcher habitat.

Sprague's pipit (Anthus spragueii)

Sprague's pipits could be significantly affected by this project. This species is very sensitive to habitat fragmentation, and it also avoids areas with structures such as those proposed in this project. "Postconstruction restoration in areas of habitat suitable for Sprague's pipit may not be an effective mitigation, since the birds would likely not occupy areas near tall structures" (FEIS, pg. 4-84).

Sonoran desert tortoise (Gopherus morafkai agassizii)

As its common name denotes, it is found in the Sonoran Desert. Sonoran desert tortoises are most closely associated with the Arizona Upland and Lower Colorado River subdivisions of Sonoran desertscrub and Mojave desertscrub vegetation types. They occur most commonly on rocky, steep slopes and bajadas, and in paloverde-mixed cacti associations. Core, higher density populations of this species tend to be "island like" and associated with steeper terrain and aspects, making the species very vulnerable to connectivity disruptions, especially as associated with the development of roads and other infrastructure. Also, additional perches for ravens can increase the mortality for desert tortoises as ravens use transmission lines as a means to scout out and prey upon young tortoises.

Sonoran desert tortoises are very susceptible to the construction and maintenance activities related to this project. The BLM proposes limited mitigation measures to address this problem and provides inadequate information to determine if these measures are even suitable. For example, preconstruction surveys will only be useful if conducted just prior to construction by a qualified biologist in order to determine if tortoises are in the path of construction. Even then, tortoises can be extremely difficult to locate, and direct mortality will still occur. Indirect effects, including habitat loss and degradation, increased recreation, and road effects, will greatly increase the impacts to this species.

Tucson shovel-nosed snake (Chionactis occipitalis klauberi)

This small, 10–17" shovel-nosed snake is primarily restricted to sand dunes and sandy-silty flats on creosote-mesquite floodplain valley floors, but they can also be found in washes and on rocky hillsides with pockets of sand. The geographic range of this subspecies is currently confined to the most arid areas of Pima and Pinal counties. Tucson shovel-nosed snakes burrow as well as crawl and are adapted for "swimming" rapidly through loose sand. The species is nocturnal/crepuscular, typically staying underground during the heat of the day and foraging for insects above ground at night. While this species was removed from the Endangered Species list in late 2014, they are threatened throughout their entire range by habitat loss and fragmentation due to development, roads, potential solar power facilities, agriculture, wildfires, and lack of adequate management and regulation.

Gila chub (Gila intermedia)

This endangered minnow species is primarily threatened by habitat degradation on the banks of the streams that they inhabit and from upstream runoff in their watersheds. Limiting watershed impacts (erosion, sedimentation, etc.) from construction and preserving riparian corridors will be essential in avoiding impacts upon this species. The mitigation impacts described in the FEIS do little to adequately address threats to this species.

b. Special-status plant species

When populations of special status plant species are found, they must also be avoided. For example, when discussing the Acuña cactus (*Echinomastus erectocentrus acunensis*), in the FEIS states that, "where possible, destruction of plants would be avoided" (FEIS, pg. 4-89). Additional details on how this would be accomplished should have been provided.

c. Biological Resource Conservation Areas

The proposed project would have impacts to wildlands, wildlife, and conservation areas in both Arizona and New Mexico. This project would affect several conservation areas that are managed for biological resources, as well as several Important Bird Areas. These lands support a wide variety of plant and animal species, including numerous special status species. Many of them are relatively undeveloped and provide increasingly important refuges for the species they support.

The proposed SunZia project and related energy development projects will harm these conservation plans and areas and compromise the integrity of the following areas and the surrounding landscapes, as well as others:

- Pima County's Sonoran Desert Conservation Plan Conservation Lands System (Pima County)
- San Pedro River Valley and migration corridor (Globally Significant Important Bird Area, USFWS proposed National Wildlife Refuge and numerous private land conservation easements)
- Pima County preserves (Pima County, State of Arizona)
- AZGFD-identified wildlife linkages (Arizona)
- Willcox Playa

The above list is not exhaustive, but merely highlights some of the areas most affected by the proposed project.

l) Wildlife linkages and habitat fragmentation

"Habitat fragmentation and loss are currently recognized as the principal threats to biodiversity" (FEIS, pg. 4-96). We are concerned about the effects of the linear fragmentation (from the transmission line and associated roads and other features), the potential effects

that may radiate outward (e.g., increased recreation, illegal spur roads, etc.), and the edge effects associated with these. Natural, undeveloped areas are critically important to a variety of species that will be affected by this project; natural, undeveloped corridors between these areas are just as important. Any source of fragmentation in these areas – whether new development or additive to other development – should be avoided.

4. Issues Related to Cultural Resources and Tribal Concerns

There are numerous cultural resources located along or in close proximity to the route. Direct impacts to these resources come primarily from ground disturbance. Indirect impacts include erosion and increased sedimentation from construction related activities. Another concern relates to the fact that the transmission line corridor will open up miles of previously unfragmented landscape with the likely result of increased vandalism and illegal artifact collecting due to increased public access.

According to the Center for Desert Archaeology and the National Trust for Historic Preservation, the route will have enormous negative impacts on the significant cultural resources in the Lower San Pedro River Valley. CDA and the National Trust indicated that the route that traverses the lower San Pedro Valley was of particular concern.

CDA and the National Trust identified over 500 archeological sites in the lower San Pedro River Valley with approximately one third of them containing architecture and probable human remains. Given this uncertainty and the high value of these resources, CDA and National Trust stated that these important cultural resources were further reason for BLM to select a No Action Alternative and to instead evaluate the use of existing transmission and transportation corridors with less harmful effect. The Committee has also received a comment letter from the Tohono O’Odham Nation outlining significant concerns about cultural and natural resources.

5. Issues Related to Visual Resources

In Arizona, the utility corridor would have high to moderate-high impacts to views observed by hikers using the Arizona National Scenic Trail and the Buehman Canyon Trail. Again, the reason given for the high to moderate-high impacts on visual resources is because the SunZia Project would be viewed in the lower San Pedro River Valley, described as a “landscape with few modifications.” [FEIS, p. 202].

The SunZia Project would have high to moderate-high impacts on visual resources to travelers on other scenic roads and byways that don’t have official scenic byway designations but which traverse relatively unmodified landscapes like the Cascabel Road and Redington Road in the lower San Pedro River Valley [See FEIS, p. 202].

It is difficult to visualize the impact of the construction of 135 foot transmission line towers and access roads cutting a 1,000 foot-wide swath through unmodified landscapes. There is a huge difference between scenery destruction as described by the dry bureaucratic language of the SunZia Project FEIS and in the materials provided by the applicant and the real world impacts seen by residents and visitors to the desert. For example, Mr. Peter Edgell wrote, “On a Sunday morning in 1974 my wife and I were awakened by the sound of a helicopter across the San Pedro River from us.

We walked outside and saw to our horror this helicopter was raising a behemoth electrical tower and more were lying in wait to be raised. We had bought our ten acres because of the beautiful views of hills and mountains on all sides of us. Now, almost 40 years later those towers are still upsetting. Several years ago I found a photo taken in 1973 of those hills. They had been so beautiful before the towers were there." Mr. Edgell and his wife will be treated to more towers should the Committee grant the CEC for SunZia.

6. Issues Related to Social and Economic Concerns

The economic analysis related to this proposed transmission line does not consider the impacts on the significant investments in areas that would be affected by the proposed project. Most of the economic benefits would be short-term and associated with construction of the transmission lines, while the negative economic impacts would be long-term, irreversible, and unmitigable.

a. Ecotourism

Many of the areas that would be most significantly affected by this proposed project – the San Pedro River and its tributaries, and the Willcox Playa – are well-known ecotourism attractions. Birders, hikers, and wildlife watchers come from all over the United States and the world to enjoy this region. Birders are particularly drawn to these areas due to the amazing diversity of birds that inhabit and migrate through these ecologically significant lands. Willcox hosts an annual "Wings Over Willcox" event that focuses on the birding in the area. In 2015, it celebrated the 20th anniversary of this event, an important component of the local economy.

The project will affect ecotourism including direct, indirect, and cumulative impacts. The economic role of public lands, river valleys, playas, and natural open space, plus the wildlife these support for the local communities and existing research documenting the economic importance of protected public land resources should be considered. Income from tourism is a sustainable source of income, but requires that the resource is managed and protected. The proposed SunZia transmission line has the potential to forever damage sustainable regional resources for a questionable purpose and need.

b. Watchable wildlife

Watchable Wildlife programs play an increasing role with state wildlife agencies and land managers. As other forms of wildlife recreation continue to decline, watchable wildlife programs are more popular than ever. In Arizona, the Arizona Game and Fish Department is seeking to "Identify, assess, develop and promote watchable wildlife recreational opportunities." In a 2006 study, the Outdoor Industry Foundation reported that all outdoor wildlife-related recreational activities generated \$730 billion annually for the United States economy and, of that, watchable wildlife generated \$43 billion annually. They reported 66 million Americans participated in wildlife viewing, which supported 466,000 jobs. Estimated economic returns included retail sales averaging \$8.8 billion, trip related expenditures of \$8.5 billion, and state and federal tax receipts of \$2.7 billion. There are some aspects of outdoor recreation not captured by these numbers as well, including visitors who come for sight-seeing, family gatherings, and for educational benefits.

A 2011 study by the National Fish and Wildlife Foundation estimated the combined value of outdoor recreation, nature conservation and historic preservation at creating more than 9.4 million jobs, generating \$107 billion in local, state, and federal tax revenues resulting in a minimum total economic impact nationally of \$1.6 trillion. The U.S. Fish and Wildlife Service contributed about \$4.2 billion in economic activity and supported over 32,000 jobs through its management of 553 National Wildlife Refuges and thousands of smaller natural areas throughout the country.

According to a 2004 study of National Wildlife Refuges, there were 36.7 million visitors who generated \$1.64 billion of economic activity in regional economies. About two-thirds of the total expenditures were generated by non-consumptive activities, meaning it was neither fishing (27 percent) nor hunting (5 percent). The authors of this study also conducted willingness-to-pay research to determine the value of these refuges beyond what it actually cost to visit. They found that visitors showed a consumer surplus of more than \$1.3 billion, with \$816 million of this amount attributed to non-consumptive visitation.

8. Issues Related to the Impact of Roads

Roads pose significant threats to the land and resources, including impacts on wildlife through direct and indirect mortality and habitat fragmentation. In addition to creating new roads in already disturbed areas, many of the subroutes would cross currently roadless areas. We are strongly opposed to construction of roads in these areas.

Roads inflict a horrific toll on wildlife, with an estimated one million vertebrates killed daily on America's highways. Roads, paved or primitive, facilitate inadvertent or deliberate disruption of wildlife. According to prominent conservation biologists, habitat fragmentation is the most serious threat to biological diversity and is the primary cause of the present extinction crisis."

Roads fragment habitat by carving otherwise large patches into smaller ones resulting in negative impacts to interior habitat. Roads also directly eliminate wildlife habitat by occupying space within the ecosystem and by altering adjacent habitat. Roadside habitats experience increased temperature extremes and solar input and pollution from exhaust, herbicides, garbage, dust, and noise. These conditions increase habitat disturbance by a minimum of 500-600 meters on either side of a small rural road and a much larger distance for highways.

Wildlife is affected directly and indirectly by roads. Mule deer frequently harassed by all-terrain vehicles (ATVs) may alter their feeding and spatial-use patterns, and produce fewer offspring the following year. Mountain lions avoid improved dirt and hard-surfaced roads and select home range areas with lower densities of these road types.

In the Southwest, roads and associated activities are the primary cause of extensive arroyo cutting during the last century. Severe gully formation negatively affects soils, vegetation, and archaeological resources. Vehicular traffic directly destroys biological resources by crushing vegetation and microbiotic soil crusts. The resulting soil compaction retards the recovery of

vegetation. In addition, off-road vehicle (ORV) use can cause unsustainable erosion rates, exacerbate the spread of non-native invasive plants, cause user conflicts, and damage cultural sites.

9. Groups Interested in the SunZia Transmission Project.

Our groups have members who use public lands affected by the proposed action for activities such as hunting, hiking, camping, bird watching, nature viewing, and other forms of outdoor recreation and enjoyment. These groups and their interests are described in more detail below:

Sierra Club – Grand Canyon (Arizona) Chapter
514 W. Roosevelt St.
Phoenix, Arizona 85004-4536
Phone: (602) 253-8633
Contact person: Ms. Sandy Bahr, Director

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club has more than 2.4 million members and supporters nationwide, including more than 35,000 members and supporters of the Grand Canyon Chapter. Our members have significant interests in the proposed SunZia Project and its impacts on natural resources. Many of our members enjoy watching wildlife, hiking, backpacking, and other outdoor and educational activities on lands that may be adversely affected by the Sunzia Project. Some of our members live near the affected lands.

Sierra Club is committed to helping reduce greenhouse gas emissions and limiting global climate change and disruption. Three of the four Sierra Club priority campaigns, Beyond Coal, Beyond Oil, and Beyond Natural Gas are related to transforming the nation's electricity sources from polluting fossil fuels to clean renewable energy and reducing energy use through efficiency and conservation are all essential to meeting our carbon reduction goals. Sierra Club members are working to rapidly increase our nation's energy efficiency and the use of renewable energy resources by advocating for improved appliance and building efficiency and standards to promote them, as well as a rapid ramp-up of distributed generation (mainly rooftop solar), community scale and large-scale renewable energy projects, including solar, wind, and geothermal generating plants. All of these will be necessary to meet our greenhouse gas reductions goals. In the short term, some proposals for large-scale renewable and associated transmission lines will be needed. We seek to minimize any impacts of that proposed transmission on wildlife, air and water quality, and other important environmental values.

Sierra Club has participated in the planning process for the Sunzia Project since BLM initiated the process in 2008. Members and staff have participated in public meetings; we, along with many of our conservation partners, submitted several sets of scoping comments on the project in 2009 as well as a final set of scoping comments in 2010, and comments on the Draft EIS/RMP in 2011 [See SunZia Project FEIS/RMPA, Appendix J, Comment ID Number 1600, Page J-159], and also objected to the Final Environmental Impact Statement in late 2014, along with several other parties.

Center for Biological Diversity

P.O. Box 710

Tucson, Arizona 85702-0710

Phone: (520) 784-1504

Contact person: Mr. Randy Serraglio, Southwest Conservation Advocate

The Center for Biological Diversity (CBD) is a national non-profit conservation organization headquartered in Tucson, Arizona. CBD has more than 900,000 members and supporters, tens of thousands whom reside in Arizona. CBD is dedicated to the protection of threatened and endangered species and their habitats. CBD members have a keen interest in the SunZia Project because of its impacts on endangered and threatened species and habitats that CBD's members work to protect.

The development of renewable energy is a critical component of efforts to reduce greenhouse gas emissions and avoid the worst consequences of global warming. CBD strongly supports the development of renewable energy production, however, like any project, proposed renewable energy transmission projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy transmission projects should avoid impacts to sensitive species and habitats, and should be minimized to avoid the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

CBD has participated in the planning process for the SunZia Project by submitting scoping comments and joining in comments submitted by the Sierra Club – Grand Canyon Chapter [See SunZia Project FEIS/RMPA, Appendix J, Comment ID Number 1600, Page J-159] and submitting separate comments on the draft Sunzia Project FEIS / RMPA by letter dated August 22, 2012 [See SunZia Project FEIS / RMPA, Appendix J, Comment ID Number 2221, Page J-475]. In its separate comment letter, CBD supported comments submitted by the Coalition for Sonoran Desert Protection, Cascabel Working Group, Defenders of Wildlife, Tucson Audubon Society, and Friends of the Aravaipa Region.

Huachuca Audubon Society (HAS)

P.O. Box 63

Sierra Vista, AZ 85636

Phone: (520) 378-4937

Contact Person: Ms. Tricia Gerrodette, President

The Huachuca Audubon Society (HAS) is an Arizona chapter of the National Audubon Society and Audubon Arizona, representing approximately 300 members who reside primarily in Cochise County, Arizona and in the San Pedro River Valley. The mission of the HAS is to "conserve and restore ecosystems so that birds and other wildlife can flourish and enrich the Earth's diversity" [See HAS website at <http://www.huachuca-audubon.org/index.php>].

The HAS participated in the planning process by joining in the comments submitted by the Tucson Audubon Society by letter dated August 22, 2012 [See SunZia Project FEIS / RMPA, Appendix J, Comment ID Number 1601, Page J-209].

Coalition for Sonoran Desert Protection (CSDP)
300 E. University Boulevard, #120
Tucson, AZ 85705
Phone: (520) 388-9925
Contact Person: Ms. Carolyn Campbell, Executive Director

The Coalition for Sonoran Desert Protection was founded in 1998 and is comprised of 41 environmental and community groups working in Pima County, Arizona. Its mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. They achieve this mission by primarily advocating for: 1) the protection and conservation of Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species. [See SunZia Project FEIS / RMPA, Appendix J, Comment ID Numbers 1830, Page J-324.]

Thank you for considering our comments.

Sincerely,



Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon (Arizona) Chapter

/s/

Randy Serraglio
Southwest Conservation Advocate
Center for Biological Diversity

/s/

Carolyn Campbell
Executive Director
Coalition for Sonoran Desert Protection

/s/

Tricia Gerrodette
President
Huachuca Audubon Society