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**BEFORE THE ARIZONA POWER PLANT AND
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE APPLICATION OF SUNZIA TRANSMISSION LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE SUNZIA SOUTHWEST TRANSMISSION PROJECT, WHICH INCLUDES THE CONSTRUCTION OF TWO NEW 500 KV TRANSMISSION LINES AND ASSOCIATED FACILITIES ORIGINATING AT A NEW SUBSTATION (SUNZIA EAST) IN LINCOLN COUNTY, NEW MEXICO, AND TERMINATING AT THE PINAL CENTRAL SUBSTATION IN PINAL COUNTY, ARIZONA. THE ARIZONA PORTION OF THE PROJECT IS LOCATED WITHIN GRAHAM, GREENLEE, COCHISE, PINAL, AND PIMA COUNTIES.

DOCKET NO. L-00000YY-15-0318-00171

Case No. 171

**NOTICE OF LODGING SUMMARY
TESTIMONY OF STEPHANIE
SMALLHOUSE ON BEHALF OF
REDINGTON NATURAL
RESOURCE CONSERVATION
DISTRICT**

Arizona Corporation Commission

DOCKETED

OCT 13 2015

DOCKETED BY RTU

Pursuant to R14-3-211 and paragraphs 16 and 17 of the September 11, 2015 Procedural Order, Redington Natural Resource Conservation District, by and through their counsel, Lat J. Celmins of Margrave Celmins, P.C. hereby submits the summary testimony of Stephanie Smallhouse on behalf of Redington Natural Resource Conservation District in this proceeding.

AZ CORP COMMISSION
DOCKET CONTROL

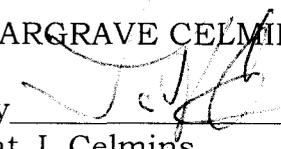
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Docket No. L-00000YY-15-0318-00171

1 Respectfully submitted this 13th day of October, 2015.

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3 By 

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10 **CERTIFICATION OF MAILING**

11 Pursuant to A.A.C. R14-3-204, the original summary testimony of
12 Stephanie Smallhouse was filed on behalf of Redington Natural Resource
13 Conservation District this 13 day of October with:

14 Utilities Division-Docket Control

15 **ARIZONA CORPORATION COMMISSION**

16 1200 West Washington Street

17 Phoenix, Arizona 85007

18 **Copy** of the foregoing mailed this 13 day of October, 2015 to:

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20 Assistant Attorney General

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28 *Kathy Allison*

**REDINGTON NRCD TESTIMONY
IN OPPOSITION TO PROPOSED ROUTING OF
SUNZIA TRANSMISSION LINE THROUGH ITS DISTRICT**

I. INTRODUCTION GENERAL EDUCATION AND WORK BACKGROUND

1. **State full name and position with Redington NRCD.**
Stefanie A. Smallhouse, advisor to the Redington NRCD
2. **Attach personal biography showing education and work experience.**
"Attached"

EXHIBIT RED 02

3. **General knowledge of SunZia routing through the District.**
Advisor to Redington and Winkelman NRCD's during the coordination process with the Bureau of Land Management beginning in 2009.
4. **Are you authorized to represent Redington NRCD in this proceeding in opposition to the CES application relating to the routing of the SunZia Transmission Line through your District? Yes.**

II. LONG RANGE PLAN – DETAILED DISCUSSION

1. Goals

The goal of the Redington NRCD is to provide leadership in promoting the conservation of all natural resources within the district through engagement with cooperators, other local governments and federal agencies.

2. Objectives

Prioritize Natural Resource Concerns;
Coordinated planning engagement with federal and state agencies;
Provide educational opportunities to our cooperators;
Apply for grants which help us to achieve our goal;
Respond to major land use actions and/or designations.

3. Districts' long range plan – discuss in detail

The district's long range plan consists of goals and objectives for a six year period based upon our responsibilities in statute, cooperator

concerns, education opportunities, and the prioritization of our natural resource concerns. The plan has the opportunity to be amended each year during the planning process. The current plan addresses: soil erosion and sedimentation; upland vegetation; water availability and quantity; water quality; noxious and invasive plants; fish and wildlife; conservation planning and education.

4. Actions taken by the District in furtherance of the long range plan.

The district has prioritized its natural resource concerns for the Environmental Quality Incentives Program authorized through the Agricultural Act of 2014. This will enable cooperators to receive funding through this program to address natural resource concerns on the ground. The District has engaged in several local efforts to address long term conservation in the valley such as the Lower San Pedro River Conservation Initiative Planning Team. The district has sponsored multiple educational workshops for adults and children addressing these concerns. The district engaged in coordinated planning for several years with the Bureau of Land Management pertaining to the Sunzia EIS. The district has assisted landowners in completing Coordinated Resource Management Plans.

5. Specific areas of concern and responsibility.

Our specific areas of concern are:

- Sediment pollution of streams and erosion of rangeland is a major problem in the district.
- The 30-40% decrease of grassland and grassland/shrub vegetation throughout the district.
- Water availability and quality
- The control of noxious and invasive plants
- Continued Education

EXHIBIT RED 05

6. What is the district policy for large scale developments or utility corridors?

The district policy currently states:

It is the policy of the Redington Natural Resource Conservation District to oppose the construction of any new major energy, transportation, or communication corridors through the Redington NRCD. When corridor placement is unavoidable and to minimize impacts of such actions, all future construction of such corridors should be along existing corridors of similar capabilities that would only require an upgrade from what currently exists. Where no corridor disturbance currently exists the conservation district will advise project managers of necessary mitigation measures to be taken in order to minimize the impact to ecological resources and rapidly implement post-construction restoration and monitoring.

EXHIBIT RED 6

III. RELATIONSHIP WITH FEDERAL AND STATE AGENCIES

1. Agreements and memoranda of understanding between district and federal and state agencies.

The district currently holds agreements with the USDA Natural Resource Conservation Service, the State CRM Planning Group, and the State Land Dept. some through its membership in the Association of Conservation Districts.

Conservation Districts are legally authorized to become cooperating agencies or coordinate local planning with federal agencies through the Federal Land Policy Management Act and NEPA.

EXHIBIT RED 7, 8, 10, and 11

IV. DETAILED DISCUSSION OF SEGMENTS OF TRANSMISSION LINE AND
THE DISTRICTS' INTEREST SEGMENT 3 SAN PEDRO RIVER CROSSING
THROUGH THE SAN PEDRO RIVER VALLEY NEAR ORACLE

1. **Map of Transmission Line Segment 3 San Pedro River Crossing
Through the San Pedro River Valley Near Oracle
EXHIBIT RED 12**
2. **Discussion of environmental impacts and natural resource issues with
detailed identification of the concerns.**

Soil Erosion: New construction of major utility corridors would further aggravate substantial erosion issues already present within the district due to the existence of smaller utility lines constructed along severely erodible soils and cross-cutting natural water movement from the uplands. The area is exceptionally dry, making reclamation of disturbed lands very difficult.

Erosion was a topic of considerable concern in the Lower San Pedro River Watershed Assessment (LSPRWA). Soil conservation is a basic objective for all natural resource management. Soil erosion on uplands can reduce soil depth and therefore reduce soil moisture holding capacity and rooting depth. Soil erosion can result in the loss of nutrients from the watershed especially since these nutrients are most abundant in the surface soil. In addition, soil erosion contributes to sediment accumulation and lower water quality in drainages and reservoirs. Soil compaction can also reduce infiltration rates and soil moisture holding capacity, thus increasing runoff and erosion hazard. The LSP

Assessment indicated that roads associated with recreation and utility construction/maintenance were the major source of erosion in the district and the number one cause of human-related gully erosion.

The Natural Resource Conservation Service describes the erosion hazard for the Stagecoach, Sonoran and Pinaleno soils, which make up 85% of the area, as severe which indicates that significant erosion is expected. The numerical rating is .95 where 1.00 has the greatest negative impact. Excessive erosion from roads can overwhelm a river's capacity to process sediment. Cross-country road construction increases unauthorized access to off-road vehicles. The clearing of vegetation and associated soil compaction from these roads counter the re-vegetation and rangeland improvement efforts currently taking place in the district.

Habitat Fragmentation: New construction of major utility corridors will result in habitat fragmentation creating a negative edge effect. This largely un-fragmented watershed includes the Chihuahuan Desert, Sonoran Desert, Southern Arizona Semi-desert Grassland, and Mexican Oak-Pine Woodland and Oak Savannah, all of which come together in the Lower San Pedro River valley. This results in a high diversity of species present in the watershed. Utility lines cause erosion, encourage the introduction of noxious and invasive plant species, increase off highway vehicle use, and increase gully erosion. All of these effects have a negative impact on wildlife habitat and water quality.

At the Winkelman NRCD/BLM/Sunzia Coordination meeting of April 13, 2010 the following statements were made by Linwood Smith, biologist for EPG, when asked if routing the transmission line through the San Pedro River Valley is a common sense alternative:

“In my humble opinion from a biological resources stand point coming up the San Pedro Valley was not a good idea. I did not care for that alternative at all. I am not even sure where that alternative came from except that there were some existing infrastructural features that were being followed and that were looked at as being opportunities. I did not support coming up the San Pedro River valley from the get go because of its uniqueness from a biological perspective. I did not think that this was going to be a very warmly embraced set of alternatives.
“

Off-Road Vehicle Use: New construction of major utility corridors will result in increased access to OHV use, thereby, further aggravating soil erosion issues and habitat fragmentation.

Noxious and Invasive Plant Species: The construction of utility corridors encourages the invasion of noxious and invasive plant species along right of ways where vegetation has been cleared. The invasion of noxious and invasive plant species was identified in the Lower San Pedro River Watershed Assessment to be a serious issue. Currently present on the western half of the district are Lehmann lovegrass, fountain grass, buffel grass, and cocklebur. All are easily spread and may be spread with the activities of utility construction.

Diminishment of long term conservation investments:

As of 2008, conservation investments on private land within the San Pedro River Valley total 25,912 acres. These acres include land purchased in order to mitigate for actions taken on southwestern willow flycatcher habitat in other areas.

Air Quality and Traffic Control:

The construction of this utility line will involve the use of multiple pieces of construction machinery needing to travel significant lengths to tower locations for a considerable amount of time. The transportation infrastructure currently located in this small valley is not equipped to handle this traffic or the air quality issues that will result. Pinal County has been designated as a non-attainment county for PM10 particulates and so has recently begun an effort to chip seal the first three miles of the Redington Road leading into the valley from San Manuel. This expensive dust and erosion control measure will not withstand this construction traffic. Water trucks will be required for dust control measures and there are no city wells located in this valley to supply the amount which will be needed.

Cumulative Environmental Impacts of Co-Located Utility Corridors:

The EIS only considered this line. Mr. Siegal and Mr. Garcia have made statements in previous coordination meetings that the likelihood for expansion exists and may even be likely. " That [additional utility lines] would be addressed in cumulative impacts to the degree that.....you acknowledge future needs for other transmission in the same path.....you know there is potential for. So cumulative impact, I have to say is going to be that there will be some new transmission lines built in the future." (Siegal, Coordination Meeting with Redington NRCD April 15, 2010)

EXHIBIT RED 13, 14 and 17

Dated this 13th day of October, 2015.

REDINGTON NATURAL RESOURCE CONSERVATION DISTRICT

Chris Hillson Stephanie Smallhouse
Stephanie Smallhouse