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Memorandum

From the office of

Chairman Doug Little

Arizona Corporation Commission

1200 W. WASHINGTON

PHOENIX, ARIZONA

(602) 542-0745

AZ CORP COMMISSION
DOCKET CONTROL

TO: Docket Control

DATE: February 3, 2016

FROM: Chairman Doug Little's Office

SUBJECT: SunZia Transmission LLC. DOCKET NO.: L-00000YY-15-0318-00171

Chairman Little has received approximately 14 emails regarding the captioned docket numbers above. The documents can be viewed in Docket Control or online on the eDocket website.

Arizona Corporation Commission

DOCKETED

FEB 03 2016

DOCKETED BY *TKC*

Carolyn D. Buck

From: Matt Clark <safepassages@gmail.com>
Sent: Wednesday, February 03, 2016 6:00 AM
To: Little-Web; Forese-Web; RBurns-Web; Stump-Web
Subject: Vote No, and Declare SunZia to be Environmentally Incompatible



The San Pedro River, a jewel of biological wealth, provider of ecosystem services. Photo Credit: Matt Clark

Dear Acting Chairman Little and Commissioners:

I would like to thank the whole Commission for providing an open and democratic process during yesterday's open meeting (February 1st, 2016). It was a good day to be an American. It was inspiring and refreshing to hear the public being given an opportunity to truly be heard, to ask hard questions (and receive answers), and give their opinions related to SunZia Transmission, LLC's (SunZia) pending application.

I urge you to continue to ask questions until you are satisfied and certain you can make a decision that is: a. unbiased; b. in the best interest the State of Arizona and its citizenry; and c. in conformance with the applicable statutes and procedures.

I urge you to deny the issuance of a Certificate of Environmental Compatibility for SunZia.

Whereas: I was born and raised in New Mexico, and have spent most of my adult life living in Arizona.

Whereas: I have earned an undergraduate degree in Environmental Science and a graduate degree in Forestry with an emphasis in Conservation Biology and Landscape Ecology.

Whereas: I have studied, in great depth, the geography, ecology and wildest landscapes of these two very special states.

Whereas: My studies have revealed the region affected by SunZia has a high degree of biological diversity and biological endemism, making environmental compatibility literally impossible to achieve.

Whereas: I have studied, at great length, the laws and procedures governing the management of many of these resources, which are managed in trust for the American public.

Whereas: Given my academic and professional experience, I in awe and humbled by what I have seen and learned about the rich biological and cultural heritage of this region.

Whereas: I believe my extensive work experience, educational background, my careful study of the SunZia proposal, and importantly, my active participation in all of the public / permitting processes it has undergone make me qualified to characterize and critique it.

Whereas: it is sole responsibility of the Arizona Corporation Commission (ACC), in tandem with the Arizona Power Plant and Line Siting Committee, to determine if SunZia's application for a Certificate of Environmental Compatibility, governed by Arizona Revised Statutes 40-360, Et Seq., passes muster -- or not.

Whereas: the ACC did not have control over exact route applied for in the CEC application for SunZia. The route for SunZia before the ACC was selected by the Bureau of Land Management. In my professional opinion, the selection of this route by the BLM was the result of a dysfunctional, politically driven, opaque, obfuscating, and illegal NEPA process. Therefore, the BLM's selected alternative could not have produced, and is clearly not an "environmentally-preferable alternative". The selected route was perhaps best described by the Arizona Power Plant and Line Siting Committee Chairman, Tom Chenal. In his concluding remarks, Mr. Chenal, called SunZia "the least worst decision". In other words, there were never any viable alternatives proposed in the first place. In fact, the viability of the project as a whole has been called into question at every public meeting and in numerous comments submitted by the public. These valid critiques and concerns were not addressed, but rather were brushed aside, during the NEPA process. The NEPA meetings that were held were informational only, and did not allow open public comments or questions. The only method provided for input was to submit written comments, verbal input to a stenographer, or to speak one on one to an official or consultant. It was a very closed, undemocratic process that I believe violated the spirit, if not also the intent of NEPA.

Whereas: the CEC and NEPA processes are independent of eachother, but are also interrelated in this case. This is because, as Member Olea pointed out in his testimony today, February 1, 2016, that the NEPA process happened prior to the CEC process, which resulted in the specific, and highly unpopular and environmentally incompatible route under consideration by the ACC.

Whereas: I have reviewed many sections of the EIS, the Record of Decision, the public record established through the Arizona Line Siting hearings and public process, listened to and considered testimony from many parties.

Whereas: I have studied the ecological and cultural resources, as well as the wilderness characteristics and values of the affected region, including many areas and habitats that would be deleteriously affected by SunZia.

Whereas: I have visited, in person, numerous locations where SunZia is proposed to traverse, and have documented them photographically and through field notes.

Whereas: I have studied maps and spatial data, in detail, to analyze the potential impacts of SunZia upon federal and state lands, to include: designated wilderness, wilderness study areas, Citizen-proposed wilderness areas, national parks, mitigation lands / conservation areas, Arizona trust wildlife species to include Arizona Species of Greatest Conservation Need, Arizona State Trust Lands, State Parks, Federally listed species and both proposed and designated critical habitats (ESA), wildlife linkages / corridor designs, bird migration corridors and migratory birds protected by the Migratory Bird Treaty Act, Multi-species conservation plans, county adopted General Development Plans, land cover classifications and GAP analysis conducted by the USGS, Ecoregional Conservation Portfolios developed by the Nature Conservancy, as well as existing infrastructure and a long list of other publicly available, scientifically rigorous spatial data sets.

Whereas: I have assisted in the preparation of numerous public comments for the SunZia proposal on behalf of non-profit 501(c)(3) conservation organizations.

Whereas: the public record contains an extensive catalogue of maps and verbal descriptions that depict many of these and other socio-political constructions and scientifically determined and mapped natural phenomenon, in relation to the proposed route for SunZia.

Whereas: the public record and testimony contains detailed descriptions of the potential harm SunZia would cause to a host of areas of internationally significant areas of biological wealth and species of state and federal conservation concern.

Whereas: the public record contains detailed information regarding how the proposed SunZia transmission line, through its construction, maintenance and mere presence on the landscape, would harm the preservation and management of areas and species of conservation concern.

Whereas: After having read ARS 40-360; having participated in most of the Line Siting Public Hearings; and having reviewed nearly the entire public record, it is my professional opinion and declaration that SunZia, LLC is not in conformance with the requirements of Arizona Revised Statutes 40-360.

Whereas: It is my professional opinion and declaration that the applicant SunZia, LLC, the Bureau of Land Management, aided by SunZia's chosen environmental consultant, Environmental Planning Group, have collectively violated the spirit and intent of the bipartisan-enacted National Environmental Policy Act of 1970 (42 U.S.C. §§4321-4370h), and both by association with and independent of NEPA, have violated the Endangered Species Act

of 1973 (ESA; 16 U.S.C. § 1531 et seq.), the Migratory Bird Treaty Act of 1916, the Wilderness Act of 1964, and the Clean Water Act. In doing so, these entities have violated the public trust.

Whereas: Whereas: I firmly believe that I have personally suffered injury and disenfranchisement as a result of these legal and ethical violations.

Whereas: Regulation: 40 CFR 1500-1508 states that "Environmental Impact Statements must highlight reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the environment. They are used to inform decisions – not to justify already-made decisions."

Whereas: the stated purpose of SunZia project has been controversial from the beginning because of its over-marketing of its renewable energy promise, while downplaying or obfuscating its purpose as a Trojan horse for more fossil fuel-based energy (e.g. permitted natural gas-fired power plant near Bowie, AZ).

Whereas: all Draft and Final EIS alternatives are routed conveniently through the Bowie area, where the permitted natural gas plant could be constructed. No alternative routes were analyzed that did not go through Bowie, AZ.

Whereas: the owners of the SunZia project also have financial interests in the Bowie permitted Bowie natural gas plant, and therefore illegally limited the scope of analysis and alternative routes such that metaphorically, "all roads led to Bowie", contrary to the plain language of the National Environmental Policy Act.

Whereas: My analysis of the public process and EIS leads me to conclude that the above-cited Regulation 40 CFR 1500-1508 has been violated, and in doing so has violated the public trust, and caused injury.

Whereas: myself and numerous colleagues have attempted to reach out to the Obama Administration to seek conflict resolution regarding the proposed SunZia project, prior to a final environmental impact study being conducted.

Whereas, attempts to reach out for information, to initiate conflict resolution and calls for transparency and due public process have not been adequately responded to or acted upon by the federal administration and permitting agencies.

Whereas: Because conflict resolution process was not initiated, and the NEPA process for SunZia failed to adequately assess a range of reasonable alternatives and instead identified a devil's choice of options.

Whereas: Two competing route alternatives in southeast Arizona, the San Pedro Valley route, and the Aravaipa Canyon route, were neither reasonable, nor prudent to construct in the first place.

Whereas: the applicant knew of these major conflicts from the very beginning.

Whereas: the applicant attempted to circumvent the public process by lobbying for state legislation that would have exempted it from the Arizona Line Siting / ACC approval process.

Whereas: A more northerly route, such as the well-studied High Plains Express project, which traverses the same broad region as SunZia was found by a multi-entity industry research group to be practicable to construct but not economically feasible given the well informed assumptions and models utilized in the study.

Whereas: Neither a true need, logical purpose, nor benefit of the perspective to the state of Arizona and its utilities has not been proven by the applicant.

Whereas: The Arizona utilities that own a small stake in the SunZia project did not provide any testimony regarding, or endorsements of, the SunZia project.

Whereas: the permitting public agency, and cooperating federal and state agencies have analyzed impacts of SunZia, identified at great length to figure out a myriad of ways to attempt to mitigate for SunZia, and to thread the needle across and through biologically wealthy areas, and to claim that the public process was sound. However, these actions do not constitute, nor should they be interpreted as, endorsements of the SunZia project.

Whereas: The applicant has not demonstrated the demand or need for the proposed project, particularly from the perspective of Arizona, Arizona utilities, and its citizenry.

Whereas: There are few “on and off ramps” / substations proposed for SunZia in Arizona that would benefit Arizona’s blossoming renewable energy industry, particularly solar-generated power produced in Arizona.

Whereas: SunZia would make sun-rich Arizona reliant upon wind blowing in New Mexico; or worse yet, the New Mexico portion would not be constructed at all, leaving the permitted portion between the permitted Bowie plant and Pinal Central.

Whereas: As a merchant line, SunZia is speculative at best, and may face bankruptcy.

Whereas: Long-distance transmission lines are inefficient, and undercuts the movement towards a local, sustainable, profitable, distributed energy system and renewable energy future for Arizona.

Whereas: better alternatives exist, including the Southline Transmission Project, which is scale more appropriately, has minimized its ecological footprint by reconstructing existing lines and following existing linear infrastructure instead of traversing roadless, undeveloped wildlands.

Whereas: The public record contains all of the above-cited information through testimony, docketed letters and correspondence, public comments, maps and other visual aids.

Whereas: I declare that myself, the Arizona citizenry, and the American public writ large will certainly suffer injury and losses of various types if SunZia is authorized and constructed as it has been planned and conceived.

Whereas: As a trained conservation biologist and policy analyst, I deem the project, which I have analyzed in depth, as deleterious to areas of unparalleled biological wealth and habitat for species at risk of extinction or of serious conservation concern.

Whereas: Major transmission line construction, maintenance and presence on the landscape cause a wide range of direct, indirect and cumulative deleterious impacts such as habitat fragmentation land conversion, including a host of unintended consequences, such as the invasion and spread of non-native plant and animal species, bird strike and electrocution risks, coronal noise disturbance, increase off-road vehicle use, roadkill, illegal or suspect hunting and collecting activities, and long list of additional disturbances.

Whereas: Many of the direct, indirect and cumulative deleterious impacts listed above are the same culprits cited in the scientific literature as being the direct and undeniable cause of extinction vortices responsible for species endangerment and extinction.

Whereas: the science of Conservation Biology has established, through the theory of Island Biogeography and various principles of Landscape Ecology and Wildlife Biology, that large, unfragmented blocks of habitat are essential reservoirs for biological diversity, genetic diversity,

Whereas: the San Pedro River Valley has been rigorously studies and has been widely documented as the most biologically rich region of Arizona, and is part of one of the second largest roadless area complex in the state of Arizona, second only to the Grand Canyon.

Whereas: the loss of undisturbed, unfragmented core habitat and habitat connectivity for wildlife that would not occur if not for the permitting, constructing and maintaining of SunZia.

Whereas: numerous reputable conservation organizations have stated that SunZia cannot be adequately mitigated for, no matter the measures taken or money expended in attempt to offset its massive impact to ecologically sensitive areas across the southeastern quadrant of Arizona.

Whereas: The San Pedro River Valley is the primary location where mitigation has been established to offset major development projects elsewhere in the state of Arizona.

Whereas: Private and public conservation investments in excess of \$50 Million have been accomplished in the San Pedro River Valley in a coordinated, thoughtful and deliberate way.

Whereas: the San Pedro River Watershed is of particular conservation and restoration interest to the Department of Interior-led Desert Landscape Conservation Cooperative.

Whereas: It is the responsibility of your body to carefully consider the above matters as required by Arizona statute, in your final deliberation for the issuance of a Certificate of Environmental Compatibility for SunZia.

Therefore: In order to comply with Arizona statutes; represent the best interest of the state of Arizona and its citizenry; protect areas of biological and cultural wealth, including state trust wildlife species, sensitive plant species, and to ensure the public process reflects the will of the majority of the public (your constituents and those you serve in your official capacity), I declare you must deny the application by SunZia Transmission, LLC. for a Certificate of Environmental Compatibility; and,

Therefore: the approval of the SunZia Transmission, LLC application would constitute a legal breach

Thank you for your careful consideration of this precedent-setting decision.

May you vote with your conscience, and keeping in mind the information contained in the record and by recent testimony, is the only basis for which you can make your decision.

I call on you too to stand up, and shut down SunZia.

Sincerely,

Matt Clark, M.Sc.



Paige Canyon, tributary to the San Pedro River, near where SunZia would be located. Photo credit: Mick Meader

Carolyn D. Buck

From: Sue Kozacek <suekozacek@earthlink.net>
Sent: Tuesday, February 02, 2016 7:27 PM
To: Forese-Web; RBurns-Web; Little-Web; Stump-Web
Subject: SunZia

Dear Arizona Corporation Commissioners: I am writing in opposition to the SunZia project that would allow a major new transmission line to be built through the Lower San Pedro River Valley.

The proposed route takes this transmission line through a globally significant bird migration corridor, a biodiversity hotspot and ecologically important riparian areas. We have so few intact riparian areas left in southern Arizona. The loss of these riparian areas has had direct negative effects on flora and fauna in Arizona decreasing the diversity and sustainable health of the environment. In addition, transmission lines pose a significant strike hazard to birds.

Also, this project would cut across some of the last open space land left in Arizona. These are the open spaces and views that we all enjoy while traveling in this section of the San Pedro River.

All these impacts add up and diminish the resiliency of southern Arizona to support those things which we all love about living here.

I ask that you not approve a Certificate of Environmental Compatability for the SunZia Southwest Transmission Line.

Sincerely,

Susan Kozacek
7850 N Silverbell Rd Ste 114-316
Tucson, Arizona 85743

Carolyn D. Buck

From: Peggy Alexander <peggyalexander@q.com>
Sent: Tuesday, February 02, 2016 12:33 PM
To: Little-Web
Subject: Please vote NO!

SunZia would result in direct, indirect, and cumulative impacts to intact wildlife habitats, including riparian areas, Sonoran desert uplands, grasslands, bird migration corridors, and numerous wildlife habitat linkages. Transmission lines also pose a significant strike hazard to birds. If permitted and built, the SunZia corridor would inevitably invite other proposals for co-located infrastructure, resulting in unacceptable cumulative impacts to this unique and ecologically sensitive landscape.

Peggy Alexander

32032 N 69th St

Scottsdale AZ 85266-9316

480-488-3006

"Wilderness is not a luxury, but a necessity of the human spirit, and as vital to our lives as water and good bread" ...Edward Abbey

Carolyn D. Buck

From: Saxton, Terry <tsaxton@xtensible.net>
Sent: Tuesday, February 02, 2016 12:09 PM
To: Forese-Web; RBurns-Web; Little-Web; Stump-Web
Subject: Please Vote NO for CEC for SunZia SW Transmission Line

Importance: High

All,

This email is to express my strong objections to the SunZia Southwest Transmission Line proposed to be built through the Lower San Pedro River Valley – an important bird migration corridor and hotspot for many types of wildlife. There are very few pristine riparian areas left in Arizona – about 90% have already been eliminated through a combination of natural and human development causes. I personally value and visit this area for birding and the habitat that is needed to support the wildlife. Surely there are other routes that would avoid permanent loss to this important natural area in Arizona.

Please consider whether this transmission line is really needed at this time, and if so, does it need to be routed through this corridor. If cost savings is the primary reason, I would argue that this is a poor exchange for the state of Arizona, which benefits immensely from tourism, with birding in SE Arizona being one of the major draws.

Please vote NO for approval of a Certificate of Environmental Compatibility for the SunZia Southwest Transmission Line as currently proposed.

Respectfully,

Terry Saxton
Vice President, Standards and Special Projects
Xtensible Solutions, LLC

2001 S. Diamond D Drive
Tucson, AZ 85713
LinkedIn: [linkedin.com/in/terrysaxton](https://www.linkedin.com/in/terrysaxton)
tsaxton@xtensible.net | www.xtensible.net



Carolyn D. Buck

From: Jennie Macfarland <jmacfarland@tucsonaudubon.org>
Sent: Tuesday, February 02, 2016 10:37 AM
To: Forese-Web; RBurns-Web; Little-Web; Stump-Web
Subject: Strongly oppose SunZia

Hello ACC Commissioners,

Please do not approve SunZia! The San Pedro river valley is so beautiful and such an important asset to our state. The wildness of the landscape, the wonderful wildlife that use the area and the important archaeology sites make this area too important to put a power line through it.

There are other ways to generate power than moving it from a New Mexico windfarm all the way to California - just use that power in New Mexico.

Arizona deserved to not be used as a damaging pass through for power from other states. Please protect your state and its resources!

Jennie

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Jennie MacFarland | AZ IBA Program Coordinating Biologist | jmacfarland@tucsonaudubon.org

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Office times: **Main Store and University Blvd:** Monday thru Friday 10:00am to 4:00pm

Carolyn D. Buck

From: Jennie MacFarland <birdgal24@gmail.com>
Sent: Tuesday, February 02, 2016 10:37 AM
To: Forese-Web; RBurns-Web; Stump-Web; Little-Web
Subject: Strongly oppose SunZia

Hello ACC Commissioners,

Please do not approve SunZia! The San Pedro river valley is so beautiful and such an important asset to our state. The wildness of the landscape, the wonderful wildlife that use the area and the important archaeology sites make this area too important to put a power line through it.

There are other ways to generate power than moving it from a New Mexico windfarm all the way to California - just use that power in New Mexico.

Arizona deserved to not be used as a damaging pass through for power from other states. Please protect your state and its resources!

Jennie

Carolyn D. Buck

From: Jeannie Greven <vireogal@yahoo.com>
Sent: Tuesday, February 02, 2016 10:32 AM
To: Little-Web
Subject: Please vote against approval of SunZia CEC

Dear Mr. Little,

Please vote against approval of the SunZia certificate of environmental compliance. This proposal could set a precedent in the Lower San Pedro Valley that could encourage further damaging infrastructure projects in this "one of the last best places" in Arizona.

The Valley is one of the West's significant migratory bird corridors that millions of birds pass through every year to and from their breeding and wintering ranges. SunZia could adversely affect their movement because of potential bird strikes.

SunZia could have more cumulative adverse impacts than the questionable economic benefits purported.

Thank you for your consideration,
Jeannie Greven
retired wildlife biologist
Green Valley

Carolyn D. Buck

From: Gigi Taylor <rvgigi@gmail.com>
Sent: Tuesday, February 02, 2016 7:58 AM
To: Little-Web
Subject: Please VOTE NO on Proposal for a major transmission line through Lower San Pedro River Valley!

Dear ACC Commissioners:

Re: The Arizona Corporation Commission decision about whether or not a **major new transmission line** will be permitted that would be built through the untrammled Lower San Pedro River Valley. -- a globally significant bird migration corridor and biodiversity hotspot.

As a member of Tucson Audubon, I strongly oppose this location for the following reasons:

Tucson Audubon is opposed to the proposed because an examination of the issue does not demonstrate a need for this power corridor, and because such a location will have extensive negative impacts to vital conservation lands and birdlife in southeast Arizona.

1. SunZia would result in direct, indirect, and cumulative impacts to important intact wildlife habitats, including riparian areas, Sonoran desert uplands, grasslands, bird migration corridors, and numerous wildlife habitat linkages.
2. Transmission lines also pose a significant strike hazard to birds.
3. If permitted and built, the SunZia corridor would inevitably invite other proposals for co-located infrastructure, resulting in unacceptable cumulative impacts to this unique and ecologically sensitive landscape.
4. Paige Canyon, a tributary of the San Pedro River, is an example one of many special habitats that would be negatively impacted by this project.
5. The San Pedro Valley significant to me because I am a "wildlife tourist" who enjoys visiting natural areas in our state, which support our birdlife, wildlife, recreation and local economy.

Please vote "No" on the CEC!

Gigi Dobbs Taylor
6240 Blue Blvd.
Tucson, AZ 85743

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Gigi Taylor

See Our Location - click here:
<http://map.datastormusers.com/user2.cfm?user=5866>

Gigi & Chuck Taylor
6240 N Blue
Tucson, AZ 85743
985-788-0991

Carolyn D. Buck

From: Joy Bell <joyabell_az@yahoo.com>
Sent: Tuesday, February 02, 2016 7:47 AM
To: RBurns-Web; Little-Web; Stump-Web; Forese-Web
Subject: Opposition to SunZia

Dear Commissioners-

I cannot be at the meeting in person today, but I want to express my concerns to the SunZia transmission route. As an Arizona resident and birder and member of Tucson Audubon Society, I really appreciate the beauty and wildlife in the Lower San Pedro River Valley and would love for it to remain pristine. The area has so much to offer wildlife enthusiasts and likely hunters too. Other birders from around the world come to Southeast Arizona for the beauty as well and spend their money in Arizona. We are losing habitat throughout Arizona and the nation. If the transmission lines were to go through that area, I fear additional development would also follow as well such that even more habitat and beautiful country and scenery would be lost. It would be better to look for alternative routes and means, or question whether this is even necessary, so please, I urge you to vote no on the SunZia Southwest Transmission Line.

Sincerely,

Joy Bell
1408 E Redmon Dr.
Tempe, AZ 85283

Carolyn D. Buck

From: Marshall Magruder <mmagruder@earthlink.net>
Sent: Monday, February 01, 2016 12:34 AM
To: Little-Web; RBurns-Web; Forese-Web; Stump-Web; Biggs
Subject: Comments - SunZia CEC, Docket Line Siting Case 171, Docket
L-00000YY-15-0318-00171
Attachments: 160131-Comments on the SunZia Transmission Line Proposal .pdf

Commissioners:

Please see the attached comments, that do not support approval of this CEC.:::

Respectfully submitted,

Marshall Magruder
PO Box 1267
Tubac AZ 85646
Marshall@magruder.org
520.398.8587

**Comments on the SunZia Transmission Line Proposal to the
Arizona Corporation Commission**

**Marshall Magruder
31 January 2016**

My name is Marshall Magruder, a resident of Tubac, and intervened in several line siting cases before this Commission and others including various rate cases.

These comments concern several areas, with the “*need*” for this system being severally doubtful, the new corridors having extreme environmental damages, and the entire project not beneficial for the state of Arizona.

Before I begin, let me remind the Commission of the *First Law of Transmission Line Siting*, that is, “to use what is there first before using something new and undeveloped.” Modifying an easement or using existing rights of way is always preferred to a new one.

First, this company tried to *bypass the Siting Committee* with an attempt to have our state legislature “skip” the Committee and going directly to the Commission since they had a Final EIS and ROD. The *EIS only covers the federal lands and NOT state or private lands*. That is *your responsibility* and where *you have complete authority*.

From your view, this is not a federal project but a private venture to place a transmission line with the goal of collecting “wheeling charges” and FERC rebates. This is not a line designed to support the electric utilities in this state. For example, there is only one substation along its Arizona route, specifically for the Bowie Generation Station. There are no other substations, thus no service for Pima County and service for other Arizona location. Arizona is not the objective for this project.

Second, there is another project, called *Southline*, sponsored by DOE’s WAPA, that will use an existing corridor to upgrade an existing single 115kV line to a two 230kV lines that will provide transmission nearly parallel to the SunZia route (other than along the San Juan River). It will be much less expensive to build, less environmental impacts, and meets the needs of Pima and Cochise Counties, especially the cooperatives, for many years. This planned project, authorized by the Energy Policy Act of 2005, Section 1222, must be considered a viable alternative to the SunZia project. I fully support that project. It will improve reliability and capacity in southern Arizona. SunZia does nothing.

Third, the “*goal*” of the SunZia project is to provide renewable electricity (RE) from eastern NM to a Pinal County substation and thence to California. This was to provide renewable electricity so California could meet its RE requirements. There are no problems with California meeting its RE goals that have been increased since initiation of the SunZia project. *That “need” does not exist*, and furthermore, there are no lines with additional capacity to take this electricity to California from Pinal County.

Fourth, there are two projects in the SunZia proposal, one for an AC transmission line and a possible AC or DC second transmission line in the future. There are prior cases where changing from DC to AC have required a new CEC, thus you must **not** approve an unknown second transmission line at this time and require a second CEC be approved

for the second line, whenever, if ever, it is "doubtfully needed" Since this second line will probably not be required within five years of the ROD, a new or Supplemental EIS will be required. Approving this CEC the meeting is giving a *premature approval* when additional EIS and public comments will be required for the federal part of this project. Thus, recommend only approve the AC line during these hearings.

Fifth, the **Bowie Generation Station** substation interconnection is the *only* potential benefit for Arizona; however, this "new" project is sponsored by the SunZia's sponsor and one if its main reasons for being here today. This generation station should be moved and co-located near the coal-powered Apache Generation Station near Willcox to replace the coal with natural gas. This uses existing corridors and provides access to the grid by the **Southline** system. This resolves the ongoing EPA challenges at Apache, gives the "Bowie" station an interconnection and does not need the SunZia transmission line.

Sixth, one goal for SunZia was to "*remove congestion*" on path 49, northwest of El Paso, who receives electricity from the Palo Verde Nuclear Generation Plant. If this line is near capacity, and a new *Southline* will carry WAPA electricity East, then why do we need another SunZia line to carry power going West. Power flows to the demand, thus less power is required and SunZia large capacity is a waste. Why have one line going one way and another going the other way, between nearly the same points? This is in the "dumb category" of waste.

Seventh, the US Army *Electronic Test Range* in Cochise County is a national treasure and any electromagnetic interference from SunZia will harm national security. Based on decades of military experience with such issues, I do not consider having this project with bare lines, radiating electric and electromagnetic energy near this Test Range.

Eight, further, the electromagnetic radiation from 500 kV lines will *induce electricity* into any natural gas, water, or petroleum ferromagnetic pipelines and even cattle fences. The complex process used to determine these impacts is very challenging and must be verified to ensure no damage the lifecycles of these pipelines. Consequences of induced electricity can be *explosive* or *life-threateningly shocking*. The conductivity of the underground soil in the vicinity of the lines must be taken into account now.

Ninth, and my final point, is these structures should be coated with dulled, galvanized plated poles to *reduce their visibility*, a major complaint concerning transmission lines, **especially in rural areas and valleys**. Also, a dome cap should be placed on top of any monopole, so that raptors do not have a new perch and that can change the ecology of the areas near these lines.

I recommend Southline and do not recommend approval of the SunZia project.

Sincerely,



Marshall Magruder
PO Box 1267
Tubac, AZ 85646

Carolyn D. Buck

From: Patricia Meyers <pat.meyers@cox.net>
Sent: Monday, February 01, 2016 9:37 PM
To: Little-Web
Subject: Proposed Sun Zia Transmission Line

I am strongly opposed to the proposed SunZia transmission line and request that you do all you can to stop it. Without doubt the line will drastically and adversely impact migratory bird flyways, riparian flora and fauna and nearby pristine areas of Southwest Arizona. It is uncertain whether such a transmission line is now necessary and whether it must move through the San Pedro Valley and related, adjacent properties. It is doubtful that any benefits that might accrue to Arizona and its residents will justify the irreparable destruction that is certain to occur with this plan.

Therefore, I urge you to deny the Certificate of Environmental Compatibility for this project.

As a fulltime Arizona resident and an active voter, I ask that you let me know how you view the data presented for and against this project and how you vote on this important issue. Please let me hear from you.

Thank you,

Patricia Meyers
Green Valley, AZ 85614

Carolyn D. Buck

From: Kimberlyn & Andy <kjam@comcast.net>
Sent: Monday, February 01, 2016 9:06 PM
To: Forese-Web; RBurns-Web; Little-Web; Stump-Web
Subject: Please Oppose the CEC for SunZia!

Dear Commissioners,

Please deny the Certificate of Environmental Compatibility for the SunZia transmission line proposed to cut across the lower San Pedro Valley. The line is not necessary. The landscape is pristine. Once the landscape is ruined by an unnecessary utility line, it will be ruined forever – we won't be able to get it back. The area is important for birds and other wildlife, not to mention to human beings who want and need pristine open spaces to enjoy.

Again, please deny the CEC for SunZia.

Thank you,
Kimberlyn Drew
Tucson, AZ
(520) 237-1408

Carolyn D. Buck

From: loraine zagula <loraineza@gmail.com>
Sent: Monday, February 01, 2016 7:38 PM
To: Little-Web
Subject: Sunzia

I am writing to express my opposition to the approval of a CEC for SunZia.

Research indicates there is not a demonstrated need for it. The extensive negative impacts to vital conservation lands, birdlife, and visual and cultural resources in southeast Arizona far outweigh the project's purported benefits.

Loraine Zagula

Tucson, AZ